



Healthy Environment, Strong Communities, Accountable Government

New York State Energy Planning Board
SEP Comments
NYSERDA
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July 8, 2008

Dear NY State Energy Board,

The Neighborhood Network is writing to comment on the draft Scope of the 2009 NY State Energy Plan. Thank you for meeting with us today and engaging the Long Island environmental community.

1) Under section A, item “e” of the draft, you state that one element in the Plan will be to look at projections of energy prices over the forecast periods. We recommend that you analyze several different scenarios. At a minimum, three scenarios should be provided with fuel costs staying constant, a moderate increase, and a larger increase that is at least in the 10% rise that has been seen in the last twenty years.

2) In addition to looking at future scenarios, NYPA and other agencies should do a re-analysis of actual savings from projects that have been completed in the last several years. In light of the rapid rise in the cost of oil, the agency is under-selling the financial benefits of its efficiency retrofit projects.

4) Under section A, item “g” of the draft, it states that the State will assess the impacts of the health impacts of fossil fuel generated energy. In addition to the direct health impacts, there are the related financial impacts from lost wages, medical bills, etc. These economic impacts are sometimes referred to as the “externalities.” This is very important especially in the context of offshore wind where this issue is sometimes overlooked. So though it is difficult to determine in precise terms the health benefits of cleaner air, there are some general guidelines available could provide general estimates of some externalities, such as the reduced numbers of trips to the hospital etc. More concrete data in this area would help to balance out the range of arguments currently being debated about the positives and negatives associated with wind and other renewables.

3) There is an assumption in all energy planning (see also the LIPA Energy Master Plan) of continued future growth in demand and therefore in the need for growing the generation capacity. However, if we are to reach specific greenhouse gas reduction targets – such as the 80% reduction goal for the year 2050 – then the investments in continuing to grow the energy infrastructure may not be necessary. An alternative scenario should be planned for and analyzed

that takes into account the goal to stop the growth in energy demand, and begin to reduce energy use.

4) On Long Island we have are having great success with individual townships adopting a higher energy efficiency standard for their new home construction code. In fact to date, 8 of the 13 Long Island Towns have amended their town building codes by adopting *Energy Star Homes* standards for all new home construction. Section A – K of the Scope considers the economic growth opportunities from clean energy initiatives. On Long Island, as a result of this law, we have already seen growth in the HERS Raters industry (from 2 companies to 50) and in prefab home construction (there is one facility now located on Long Island, there was never any in the past), this kind of job creation should be studied. We will also see tens of millions of dollars staying in the local economy as a result of the thousands of energy efficient homes that are now being built. This will result from the avoid energy costs which will put money in home owners hands to spend on local businesses rather than utilities. After an initial negative reaction from the LI Builder's Institute to this legislative initiative, the builders are now on board and supportive of these efforts. (Each of the 8 towns that have adopted the law, have done so unanimously.) The builders would like to see a uniform standard across Long Island and are therefore supporting efforts to get the law passed in the remaining 5 towns, because they would rather not have a patchwork quilt of different law. The State should follow Long Island's lead by setting the State Energy Conservation Construction Code requirements to a higher level for all new residential construction. It is critical that such a higher standard must also include a verifiable test.

5) It is sometimes said that you can't manage what you don't measure. Currently, we don't measure the State's, or a region like Long Island's, carbon footprint. We don't break those numbers down by sectors, etc. In order to discuss targets for reducing energy use and CO2 emissions, it is critical to first have baseline data. The State could provide a role in generating this info.

6) The State should review all of its energy efficiency standards for appliances, etc. With the recent jumps in energy prices, the formula for determining whether an increase in efficiency is worth the increased cost of the products should be re-analyzed. Substantially higher standards should be adopted in all areas that the State has authority to do so.

7) On Long Island, a large percentage of homeowners use home heating oil. This is highly polluting and increasingly expensive. The CO2 emissions from this high reliance on home heating oil should be analyzed. Homeowners interested in switching to natural gas should not be required to pay thousands of dollars to build the gas utility's infrastructure.

Submitted:

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