

Network for New Energy Choices

Comments on the Draft Scope of the 2009 New York State Energy Plan

On behalf of the Network for New Energy Choices, I would like to take this opportunity to offer comments on the Draft Scope of the 2009 New York State Energy Plan. We appreciate the opportunity provided by the Energy Coordinating Working Group (ECWG) to comment on this well-crafted and comprehensive draft. In addition to the broad range of pertinent topics covered by the Scope, NNEC believes three additional topics should warrant significant attention. NNEC recommends that each of these three topics be addressed individually within an Issue Brief. These three topics include:

Distributed Energy

We recommend that the ECWG consider an additional Issue Brief that focuses on the ability to deploy distributed generation sources, such as solar photovoltaics, in an increasing scale. This Issue Brief should: (1) Address how to facilitate the process of connecting these technologies to the grid; (2) Identify barriers to connecting distributed renewable resources to the grid; (3) Identify ways to streamline and expedite the permitting of distributed renewable energy systems without compromising the public interest; and (4) Address ways for the state to help train installers and inspectors, both to increase familiarity with the systems and to promote safety.

Biofuels

We recommend that the ECWG consider an additional Issue Brief that examines sustainability criteria for biofuels produced and commercialized in the state, including standards regarding the following: (1) Land availability and use for biofuels crop production, focusing on the impacts of land use changes on agriculture, food production and conservation programs; (2) Sustainability of agricultural practices for biofuels feedstocks production; and (3) Sustainability of biofuels feedstocks, with a focus on the development of cellulosic feedstocks.

Energy-Water Nexus

We recommend that the ECWG consider an additional Issue Brief that examines the connection between water and energy within the state and evaluate where thermoelectric power generation may affect and be affected by drought, changing climatic conditions and reduced water availability due to pollution and competing demands. This Issue Brief should also (1) examine potential problems for existing energy production facilities and planned capacity increases, especially for those energy production methods that rely on water for operation and (2) identify technologies that use little to no water in operations and ways to conserve energy by conserving water.

We can provide more detail on each of these issue areas and would welcome the opportunity to meet with you to discuss further. Feel free to contact us with any questions.

Again, we appreciate the opportunity to submit comments on these crucial issues regarding the energy future of New York State.