



May 30, 2012

**VIA E-MAIL**

Gil C. Quiniones  
Co-Chair, Energy Highway Task Force  
President and Chief Executive Officer  
New York Power Authority  
123 Main Street, 16th Floor  
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RE: The New York Energy Highway Request for Information (RFI)

**HUDSON RIVER SLOOP CLEARWATER, INC. COMMENTS ON  
THE NEW YORK ENERGY HIGHWAY REQUEST FOR INFORMATION**

Please accept the following comments on behalf of Hudson River Sloop Clearwater in your review of the Energy Highway RFI responses and incorporate them into decisions regarding future Energy Highway Requests for Proposals (RFP).

The Energy Highway stresses the need for improved transmission to bring energy from the Western part of New York State to New York's Eastern and downstate regions, where demand exceeds generation. However, it underemphasizes the benefits of distributed generation and the importance of transitioning to a green energy economy that includes the increased use of renewable resources and greater energy efficiency. To the degree that improved transmission is needed to deliver wind, low-impact hydroelectric or other fuel-free electric power, existing lines should be upgraded before new lines are constructed. Additionally moving electrons over long distances lowers efficiency and is not as effective for job creation, which clean, local generation provides.

The Task Force that developed the Energy Highway appropriately acknowledged that in this time of impending climate crisis, a major goal should be emission reductions, and in a manner that does not unduly burden Environmental Justice communities.

The Task Force encourages proposed projects that contribute to reduced emissions from the power sector, are consistent with the goal of alleviating disproportionate pollution and other burdens on Environmental Justice Communities and **help to reduce the carbon footprint of electricity consumed in New York**, regardless of where electricity is produced. The proposed projects should make optimal use of existing rights-of-way and previously disturbed land areas.

**We can no longer afford to just pay lip service to this goal.** As Dr. Michael Klemens, Founder of the Metropolitan Conservation Alliance says,

“The environment is not a competing interest to be balanced with other interests; rather, it is the playing field, the very foundation, upon which all our interests compete.”

Until recently well over 90% of public and private funding for research, development and infrastructure implementation has been directed toward the implementation of large, centralized fossil fuel and nuclear power plants – with renewables and energy efficiency systems under-funded, underdeveloped and marginalized. This is changing rapidly – and this is the only change that should be supported by the Energy Highway. New York should no longer support systems that exacerbate climate change, further compromise air quality and public health or expose the people of New York to ongoing dangers of nuclear power. Beyond upgrading transmission systems, we must urgently reverse the formula of public investment and subsidy that has created the dangerous and destructive energy landscape we now find ourselves in to support a zero-emission, green energy economy. This alternative will best meet the job creation goals of the Energy Highway and assure a sustainable future for New York State.

**Repowering:** While Clearwater actively endorses repowering fossil fuel plants to assure greater efficiency and to reduce harmful emissions, it is increasingly important to phase out all coal, and older oil and gas-fired plants that are not retrofitted, and to avoid the construction of new fossil fuel plants through the active implementation of renewable energy infrastructure.

**Hydraulic Fracturing:** Clearwater has grave concerns about any proposed improvements that exaggerate the release of methane gas and increase New York's reliance on the combustion of fossil fuels in contradiction to the critical goal of reducing greenhouse gas emissions. While natural gas itself is cleaner burning than coal or oil, the process of hydrofracking used to extract it causes methane to be released at amounts that eliminate any environmental benefits that may seem to accrue from its use.

**Regional Economic Development and Sustainability Planning:** While it is true that a dependable energy infrastructure is essential for economic growth, applying sustainability criteria to the planning of such technologies is critical to the continued success of our State's economy. New York's ten Economic Development Regions are actively in the process of preparing sustainability plans. All projects funded should be consistent with REDC and regional sustainability priorities.

The potential to develop new resources should include smart grid improvements and less well-developed, fuel-free systems such as tidal/wave, deep well geothermal, and additional, but low impact, hydroelectric, to supplement vastly increased solar and wind capacity. Balancing loads by focusing on solar during the daytime hours and using hydroelectric and other storage systems to address night-time loads is the best way to achieve a truly sustainable portfolio. Private funding and public-private partnerships should indeed be incentivized to achieve this goal.

Although the demand for energy may be increasing, particularly in downstate New York, the ability to reduce energy consumption is also vast in these same areas.

While it is certainly true that New York's transmission system requires significant rebuilding and upgrading, the same can be said about its distribution system. If we aim to unite the northern and southern regions of NY State, substantial funds will need to be dedicated to the distribution system, not just the transmission system, especially to promote local energy independence and distributed generation. Despite bottlenecks, which should be addressed, most of the perturbations to reliability over the last several years have been caused by the distribution system, not the transmission system.

Among the power plants facing future operational uncertainties is Indian Point Nuclear Power Plant. Evacuation of this aging, leaking facility, located within 50 miles of the densest population in the United States at the intersection of two earthquake faults, needs to be retired and decommissioned, with an economic conversion plan – including job retraining – for employees, who will slowly be phased out over time. Recent reports, including the Synapse Energy Economics 2011 Report,<sup>1</sup> and Assembly Hearings hosted by Assemblymen Cahill and Brennan earlier this year demonstrated that sufficient replacement energy for this plant exists through 2020, by which time another 5 to 10 gigawatts should be online, mostly through solar, and situated here in New York City, the greater metropolitan area and the Hudson Valley.

Respectfully submitted,



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<sup>1</sup> Woolf, T.; Wittenstein, M.; Fagan, B.; Indian Point Energy Center Nuclear Plant Retirement Analysis: Replacement Options, Reliability Issues and Economic Effects, October 17, 2011.

<http://www.riverkeeper.org/wp-content/uploads/2011/10/Synapse-Report-Energy-alternatives-to-Indian-Point-10-17-11.pdf>