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May 30, 2012

Gil C. Quinones  
Co-Chair, Energy Highway Task Force  
President and Chief Executive Officer  
New York Power Authority  
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Dear Mr. Quinones,

We urge the Energy Highway Task Force to set principles and criteria for evaluating RFI responses and developing a proposed Action Plan. Those principles should include energy choices that are sustainable over the long term, considering the 3 spheres of sustainability: economics, the environment and society.

**I Clean energy choices are the only path to a sustainable energy future-- one that provides benefits in all 3 spheres, including job creation and few costs.**

Therefore Energy conservation, efficiency and clean renewables should be prioritized. At the same time energy generation associated with extraordinary environment, economic or social costs or permanent and irreparable harm should not be supported in any way by the state. That means that all nuclear generation should be phased out in an orderly manner, by making plans to reduce reliance on nuclear power and to decrease the purchase of nuclear energy for the grid. No new nuclear power plants should be assisted via economic incentives such as requiring customers to pay while new nuclear plants are constructed. All of New York's nuclear plants pose significant safety hazards associated with external events such as earthquakes and internal issues such as original design flaws ( Mark I designs like at Fukushima), vulnerability to fire and aging, deteriorating plant equipment. A tsunami is not necessary for New York to have the next Fukushima nuclear disaster. Hopefully this is not in our future, but all energy planning should assume that New York's nuclear plants cannot be relied on as a source of energy.

**New York needs to plan for a Nuclear -Free Future.**

**II New York has committed to 80% reduction in Greenhouse Gas Emissions by 2050.**

A key driver for energy planning today is climate change because of the simple fact that we are emitting an unsustainable level of greenhouse gases, that threaten to cause runaway global warming that is beyond our ability to control.

Unfortunately to a large extent, a major industry response to excess greenhouse gas emissions has been to highlight the need for more energy resources, rather than the need for less greenhouse gases. So we have witnessed a rush by private entrepreneurs to propose and build a large number of new generating facilities in order to get their applications approved before new requirements become more stringent.

This concentrated push has been so effective that governmental agencies are often deceived into believing that we need more energy generation now and in the future, despite evidence to the contrary. In fact, there has never been a better time to double-down on energy conservation and efficiency and demand side management.

### **New York needs to plan for a Carbon-Free Future.**

Clean energy choices are the only path to a sustainable energy future. New York has set two important goals - for energy efficiency and renewables. Failure to achieve these goals will have environmental impacts, economic costs to consumers, and social costs, particularly related to job creation.

All new generation capacity that is not clean carbon-free renewables will hinder our ability to reach the energy efficiency and renewable goals. This is, in the first case, simply because mathematically we have increased the denominator for total generation. All new generation capacity that is centralized and carbon-based is expensive, adding to the high costs New York consumers already experience.

Two energy sources are particularly problematic and vendors have been aggressively promoting them-- biomass and solid waste thermal treatment. These proposals involve thermal destruction and the generation of large quantities of carbon emissions-- even more than coal. In the case of solid waste, thermal treatment destroys material resources that provide more benefit and fewer GHG emissions via recycling or composting. In the case of other biomass, defining a sustainable level of use of forest resources is absolutely essential to avoiding a dramatic increase in GHG emissions, but this has not been done. Both of these energy sources also impact air quality by emitting other air pollutants, ie., fine particulate and hazardous air pollutants.

Neither of these energy sources are CLEAN and sustainable, nor are they carbon-free. They should not be accorded renewable energy status.

Hydraulic Fracturing poses the most significant obstacle to achieving New York's Climate Change goals. Vast quantities of uncontrolled methane emissions at drilling sites have been documented. Methane has a global warming potential of 105 times that of CO<sub>2</sub> over a twenty year period. This time period is critical to our ability to halt worsening warming. At the same time regions where hydraulic fracturing has been done have documented high ozone levels and NY is in the Ozone Transport Region. Our State Implementation Plan requires maintenance and improvement of current ozone levels and does not allow degradation. Given the current glut of natural gas in the nation, gas exploration is not about US energy independence. Instead, the gas industry is exporting gas to other countries, storing gas and using it to make more plastics, which do not degrade and pollute the environment. Plastics are the least recycled materials and the most unsustainable.

If Hydraulic fracturing is allowed to move forward, our efforts toward a Clean Energy Future will be halted. Achieving NY's 2050 goals for greenhouse gas emissions will be impossible. In addition, we will be facing extraordinary burdens in dealing with environmental degradation associated with water and air pollution.

**III The State's priority should be achieving our energy efficiency and renewable energy goals as quickly as possible.** We should be promoting innovative approaches to energy conservation and efficiency, while promoting clean, sustainable and renewable energy, like solar, wind and tidal.

We urge the Task Force not to reject proposals that advance these goals, or ones that address energy storage for renewables. We also encourage the Task Force to consider issuing a separate RFI that seeks innovative approaches to advance energy efficiency.

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We are attaching results of a poll that document the public's view and support for clean energy. We hope you will carefully consider the poll results in your deliberations.

We are emailing these comments and attaching the poll results today and will follow-up with a hard copy by regular mail.

Thank you for your attention.

Sincerely,



Barbara J. Warren  
Executive Director