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VIA ELECTRONIC MAIL AND FEDERAL EXPRESS

Thomas Congdon
Assistant Secretary for Energy
Office of the Secretary to the Governor
Executive Chamber
New York State Capitol
Albany, NY 12224

Dear Tom:

Please find enclosed the comments of the New York State Reliability Council (NYSRC) on the Draft Work Scope of the 2009 New York State Energy Plan. Your consideration of these comments is appreciated, and the NYSRC looks forward to working with you and the Energy Coordinating Working Group as you proceed with the development of the 2009 State Energy Plan.

Sincerely,



Paul L. Gioia
Counsel to the NYSRC

Enclosure

cc: Suzanne Baker
AL99833

NYSRC COMMENTS ON DRAFT WORK SCOPE FOR THE 2009 STATE ENERGY PLAN

The following are the comments of the New York State Reliability Council (NYSRC) on the Draft Work Scope for the 2009 State Energy Plan.

Technical Assessments

The draft scope proposes seven types of assessments, one of which is Electricity. This assessment should utilize to the fullest extent possible, the technical studies conducted by the New York Independent System Operator (NYISO) and the NYSRC, including studies conducted as part of the NYISO's Comprehensive Planning Process, and the studies developed by the NYSRC in the development of the annual Statewide Installed Reserve Margin (IRM). The Electricity assessment should cover future adequacy of electric generation, transmission and other resources for meeting New York State reliability criteria and rules.¹ The assessment should recognize existing and planned facilities, as well as planned retirements of generating resources. Further, the assessment should recognize impacts on generation capacity of proposed environmental programs, and the interrelationship between electric system reliability and natural gas supply.

Another assessment, Natural Gas, should consider the adequacy of gas pipeline supply to generators for meeting New York State power system reliability criteria and rules.

Issue Briefs

1. Meeting Future Energy Needs – This brief should include maintenance of reliability as one of the objectives for meeting the State's future energy needs.
2. Energy Infrastructure Needs – This brief should include the following issues:
 - A recognition of the special reliability needs of New York City and Long Island.
 - The need for national electric power system standards that are as stringent as those required in New York. The need to develop strategies to protect New Yorkers from adverse reliability impacts of electric system disturbances in regions outside New York.
 - Encourage the development of new generation facilities to meet future capacity requirements.
 - The need for a diversified mix of generation resources and conservation to protect against a loss of fuel supply.
 - The need to understand the interrelationship of economic efficiency, environmental goals, and electric system reliability.

¹ The New York bulk power system is subject to reliability criteria and rules established by the NYSRC, the Northeast Power Coordinating Council (NPCC), the North American Electric Reliability Council (NERC), the Federal Energy Regulatory Commission (FERC) and the New York PSC.

3. Siting New Energy Infrastructure – This brief should address the need to improve the efficiency of the process for developing new generation sites, including minimizing siting time requirements and the need to enact comprehensive electric generation siting legislation.
4. Environmental Impact and Regulation of Energy Systems – This brief should include criteria for assisting policy makers to assess reliability impacts of environmental programs and ways of monitoring and mitigating such impacts.
5. Meeting Transportation Needs and Alternative Transportation Options – This brief should include a consideration of a comparison of costs associated with imposing regulations on the electricity sector versus the transportation sector, and an assessment of the relative benefits that could be achieved.

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