

7. Planning and Forecasting

Regional Planning

New York City Environmental Justice Alliance

Regional planning is also essential in this State. Many energy issues, particularly electricity, are region specific. There needs to be load-pocket plans that specifically forecast how much energy will be needed in the short term and long term, . . . so that we're, in fact, looking at each load pocket to make sure there is enough energy being generated in that load pocket so they can take care of themselves.

Honorable Paul D. Tonko, Chair, Assembly Energy Committee

The State Energy Plan examines conditions and draws conclusions on a statewide basis, thus failing to provide in-depth market analyses of the energy needs of upstate and downstate. The failure to address energy requirements on a regional basis renders the Energy Plan an ineffective tool to develop solutions for individualized markets.

Response: The State Energy Plan is a statewide planning document but an assessment of the New York City and Long Island areas has been included because of the significant need for additional resources in those areas. The scenarios examined provide information about trends and needs in the various load areas throughout the State.

Sierra Club, NYC Group

The various regions of the State have differing needs, different resource problems, different pollution problems, different energy resources (wind, sun availability). Regional plans should be created that address these differences. Regional plans should also ensure that environmentally sensitive and significant areas are not included in any proposed future projects.

Response: The adequacy of generation and transmission for each locality and region needs to be regularly reviewed and consideration given to regional needs and resources. Market-based solutions will continue to form the basis for meeting energy needs within the limits set by environmental requirements. The State Energy Plan includes an assessment of the electricity system in the New York City and Long Island areas.

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Environmental Accounting and Externalities

Brett Maxwell

Most economic models are somewhat inadequate because they do not fully account for the complexity of the reality they try to reflect and, therefore, their projections are sometimes incomplete. One of the great shortcomings of energy planning is the omission of the huge military costs involved in defending our supply of oil, the omissions of costs associated with pollution and global warming, health care costs resulting from air pollution, for example rapidly increasing asthma rates, and the opportunity costs of burning oil for fuel. Section 3-6, page 3-159, states that petroleum accounts for 40 percent of New York's total energy demand. Such costs are not accounted for in that number. Significant long term savings can be achieved by replacing the demand with renewable energy sources.

Hudson River Sloop Clearwater

When trying to calculate the true cost of electricity, we would suggest that the study conducted by APT Associates forms a good basis for determining the huge social and economic cost of the current level of fossil fuel use.

We believe that internalizing these [health] costs would greatly enhance the cost benefit analysis, especially when comparing the benefits of energy efficiency or zero emissions technology versus new fossil fuel powered plants.

Green Party

The draft State Energy Plan inappropriately confuses cost with price throughout the Plan. The prices commonly attributed to coal and gas, for example, fail to reflect and incorporate the price of pollution and other travel related inefficiencies that are externalized by the state's accountants. Serious efforts must be made to account for the cost of these fuels, not simply their immediate out-of-pocket prices.

Among the fora, where these efforts need to be made is the report described on page 3-61 that NYSERDA is preparing to assess the so-called cost per kilowatt hour of renewables with conventional energy for the next three-five, ten, and twenty years. The Green Party urges the authors of this report to not confuse price with cost and to adopt an accurate accounting system that reflects the differences where they occur.

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Ann Link

Regarding page 2-24 New York's Energy Prices Compared to U.S. Averages. These prices are inaccurate because they don't reflect the full cost of energy by including health and pollution costs for petroleum, coal, and nuclear energy.

Response: The State of New York does not use environmental accounting in its analyses of the costs of fuels and energy resources because these costs are very uncertain and often difficult to agree upon. At this time, no accepted standard exists for environmental accounting procedures.

Miscellaneous Suggestions

David Stout

Providing renewable energy sources and efficiency systems for the largest sectors that use primary energy in New York State should be a key goal. A pie chart showing current percentage use of primary energy use by sector should be included in the State Energy Plan.

Response: A pie chart showing current percentages of primary energy use by sector is featured in the NYSERDA publication *New York State Patterns and Trends 2000*, Figure 1-2 "New York State Primary Consumption of Energy by Fuel Type and Sector, 2000", page 4. The State Energy Plan presents this and related information in Section 1.

Consumers Union

The State should work with New York City to conduct comprehensive planning around the electricity needs of New York City.

We believe that within the context of the 2002 Draft State Energy Plan there is a need to disaggregate areas geographically and study the particular problems in New York City and the measures needed to prevent the exercise of market power. The 1998 Energy Plan acknowledged that load pockets would be particularly vulnerable to the exercise of market power in the electric restructuring. Unfortunately this analysis was not matched by appropriate action in New York City. In addition, it is apparent that New York City has not received an equitable distribution of very limited SBC funds for demand reduction measures. Only 27 percent have been used in Con Edison territory despite serving over 40 percent of the residential population of the State. New York City residential consumers have been doubly impacted by electric market restructuring with high retail rates and with

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numerous power plants proposed and sited within this congested city. Most egregious is the failure to undertake comprehensive and thoughtful planning that considers all these factors and finds equitable and viable solutions.

Response: The solution to load pocket problems in the New York City area requires a combination of new generation, transmission reinforcements, demand response efforts, and appropriate market mitigation measures. New York State will continue to work with all the market participants to study and resolve these important issues. An assessment of the New York City and Long Island electricity systems is included in the State Energy Plan.

Ann Link

We are concerned that the Draft State Energy Plan's preoccupation with increased use of natural gas for large-scale generation is preempting appropriate attention from natural gas fired distributed generation and combined heat and power systems (CHP) in favor of other clean distributed generation technologies. In fact, one of the best measures available to extend the natural gas supply is to shift generation into CHP with its efficiencies in the 70-80 percent range. We anticipate that increased use of competitive natural gas pipelines and natural gas distribution infrastructures should make natural gas available for distributed generation and CHP engine and turbine technologies that meet emission requirements. Therefore, these technologies should not be disadvantaged in forecasts and in the identification and removal of disincentives to deployment.

Response: NYSERDA is very involved with and optimistic about the potential contributions of distributed generation and combined heat and power technologies (CHP). In fact, distributed generation is a consequential ingredient in the electricity deregulation model. Increasing distributed generation contributes to a free electricity market because it offers direct competition with energy services companies.

See Section 3.4, Electricity Assessment, of the State Energy Plan for a discussion of distributed generation. The New York State Public Service Commission has extended and expanded the system benefits charge in 2001, providing nearly \$57 million over the next five years to improve the viability of distributed generation and CHP as economic energy options in New York State.

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The Joint Supporters

To assess resource potential more fully, we think the combined heat and power analysis NYSERDA has already performed, or had performed by Nexus, will be fully reflected in the State Energy Plan's analysis and resource assessments.

Response: The Energy Nexus Study is not complete. A draft report is undergoing major revisions in response to feedback from the Project Advisory Board. However, selected information from the partially revised report was used in the regional electricity load and price modeling in the State Energy Plan. See Section 3.4, Electricity Assessment.

Doug Goodman

I'm here as an individual on behalf of the propane industry. When I reviewed the State Energy Plan, I noticed the lack of involvement of the propane industry in the plan. It did not appear that there was anybody from the LPG industry that was involved in the focus group or interest group.

I would like to have the opportunity to have propane revisited as part of the Draft State Energy Plan.

Response: The State Energy Plan Petroleum Assessment includes a section addressing propane prices, supplies, and infrastructure.

Better Queens Environment (BQE)

The demand forecasts in the State Energy Plan assess only oil, gas, and coal, omitting renewables such as solar, wind, biomass, and fuel cells. Demand for renewables needs to be accounted for. BQE suggests that renewables data be provided in all demand forecasts.

Citizens Campaign for the Environment

The State Energy Plan does not provide a well-documented forecast for alternative fuel sources (only fossil fuel is covered). The State Energy Plan should provide estimates on all remaining fuel supplies similar to those provided for coal.

New York Chapter Association of Energy Engineers

Retirement and replacement of electric generation plants [by renewable resource generation] and associated impacts are not addressed in the State Energy Plan in any detail.

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Response: The demand forecasts in the State Energy Plan are stipulated by Energy Law. The statute does not require supply forecasts for renewable energy. Nevertheless, the Renewable Energy Assessment, Section 3.3, does assess current and future supplies.

New York State Environmental Justice Alliance

The Draft State Energy Plan fails to give an analysis of jobs per megawatt per year generated by fuel source. In studies we've seen, renewable generation generates far more jobs than other types of power generation.

Response: The importance of renewable generation to both the environment and the State economy is recognized and articulated in the Energy Plan. The State is striving to create a viable renewable market on both the demand and supply sides, as evidenced by the objectives and recommendations in the State Energy Plan.

Diane A. Davis

The Draft State Energy Plan should explain why New York spends more for electricity cost components than the national average when we buy the same crude and refined products as other states?

Response: This issue is addressed in Section 2.2, Energy and Economic Development, of the State Energy Plan. See, also, the year 2000 Department of Public Service publication, *Financial Statistics of the Major Investor-Owned Utilities in New York State*. A graph on page 29 of that document entitled "Average Cost per Ultimate Customer kilowatt hours" offers an updated breakdown of electricity costs in New York and the United States in general.

Oil Heat Institute of Long Island

The institute takes no position on the issue of whether or not these proposed power plants should be built or even whether their potential electric supply is needed. We take a firm stand on the issue of power plant fuel supply, particularly as it affects the supply of heating oil. Our industry position can be summed up in one sentence. In order to be licensed, these proposed new power plants should have a firm noninterruptible gas supply or they shouldn't be built. Failing that, seven to ten days on-site storage should be absolutely mandatory.

In our opinion, the Draft State Energy Plan must reflect the need to maintain reliability of supply and service in all areas of energy usage, oil, gas, and electric, without

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distinction and without undue preference. Anything less is little more than wishful thinking.

Response: The Planning Board recognizes the concerns raised by the Oil Heat Institute. As discussed in Section 2.1 of the State Energy Plan, Promoting Energy Industry Competition, an in-depth study is underway to assess the interrelationships between electricity, natural gas, and oil. While the results of that study may lead to actions by the Energy Planning Board in the future, the State Energy Plan requests the New York Independent System Operator to consider the certainty and availability of primary and back-up fuel supplies in valuing capacity from electric generators or to consider the certainty and availability of primary and backup fuels in establishing local reliability rules. See section 2.4, Energy Policy Objectives and Recommendations.

Hudson River Sloop Clearwater, Inc.

We question the use of “energy intensity” as a valid measure of energy efficiency. Energy intensity is a ratio measured as British thermal units per dollar of Gross State Product. The carrying capacity of the natural world does not recognize arbitrary economic ratios. We assume New York State's increase in total carbon output is proportional. The State Energy Plan must address cumulative impacts because this is what the environment is receiving. We request that the Energy Planning Board do a better job of looking at long-term tallies and cumulative impacts when examining environment issues.

Response: Energy Intensity is a valuable indicator of economic activity and resource requirements. While it may not be a sufficient ratio to describe the cumulative effects of energy consumption on the environment, it is a valuable index to use in setting goals.

Mirant New York, Inc.

It is fine for the State to hope for the best, but it is essential that it plan for the worst. The Draft State Energy Plan fails in this regard. Many of the recommendations and projection contained in the Draft State Energy Plan appear to be predicated on combinations of optimistic scenarios. While the projections have high and low case bandwidths, these are themselves built on layers of highly variable assumptions. What the Draft State Energy Plan fails to do is offer plans for dealing with, or better yet avoiding, the consequences of negative scenarios.

If reliability is to be secured and prices reduced, the Draft State Energy Plan must give significantly most attention to various “what-if” scenarios. The State Energy Plan's

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single most important task should be to remove barriers and to offer guidance and realistic proposals for avoiding fundamental supply and price issues in case everything does not go just as we hope it will.

Niagara Mohawk Power Corporation

Perhaps the greatest flaw in the draft State Energy Plan is it promotes energy policies with limited acknowledgment of the alternatives and with little or no underlying cost analysis. The draft State Energy Plan contains a variety of policy recommendations for which costs are not quantified. What is the least cost package of policies that will satisfactorily address the State's energy needs? The draft State Energy Plan does not attempt to answer this fundamental question. In addition, it does not provide a cost benefit analysis to determine what combination of policies might provide for most or all of the needed results as determined by the stakeholders.

The absent cost analysis undermines the accuracy of an important finding of the draft State Energy Plan. Electricity prices are forecast to decline by about five percent per year for the next five years. Since the draft State Energy Plan did nothing to quantify the potential cost impacts of the various measures and policy suggestions it contains, these reductions do not reflect any such costs. If some of the policies are found to be costly, it may reduce the expected savings. Would the impact be less than one percent, more than five percent, negative? One simply cannot determine this because the draft State Energy Plan does not address cost impacts.

Donald R. White

The draft energy plan appears to assume a relatively stable supply of energy for the foreseeable future. This assumption is shown to be untenable by industry experts.

Response: The scenarios presented in the “Electricity Assessment” provide a range of possible energy futures and identify some of the impacts that one might expect. The “No Additional Construction” scenario particularly illustrates the consequences that might be expected if additional generation resources are not forthcoming. The fact is, however, that several additional market-driven resources are already under development, and others are pending. Even so, the “Promoting Energy Industry Competition” issue paper addresses how resources might be provided through State actions in the event the market should fail to deliver the necessary resources in a timely manner.

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Niagara Mohawk Power Corporation

The implications of inadequate generation supply are not adequately explored in context with the scenarios analyzed in the electricity assessment. The scenarios do identify the reserve margins that might result from various combinations of generation resources and electricity demand, extending out through 2020. Implicit in these tables are numerous assumptions, many of which bear considerable variability themselves. Coupled with the effects of variability and weather, each of these demand forecasts – high, mid-range, and low – actually have bandwidths of their own. Consequently, it is easy to become too comfortable with any scenario that shows an 18 percent reserve margin achieved in a given year. The draft State Energy Plan itself acknowledges this. However, the draft State Energy Plan does not adequately discuss the depth of exposure faced by the State due to these effects, and how adequate a combination of operating measures and market forces would be in dealing with the generation shortages that might occur. While Niagara Mohawk generally prefers market forces over State intervention, we believe that there is a gap in the draft State Energy Plan because it does not discuss these difficult policy issues.

The Business Council of New York State, Inc.

While the Draft State Energy Plan does state that New York is in need of more sources of electric generation, its projections for growth in electric power demand over the next three to five years seem unrealistically—indeed dangerously—low. The Draft State Energy Plan offers a “mid-range forecast” for peak demand growth yet peak demand has grown an average of 2.1 percent over the past five years. Peak demand has consistently grown faster than total electric consumption.

This unrealistically low forecast for peak demand leads the State Energy Plan to incorporate projections for increases in reserve margins that are overly optimistic. These low projections, in turn, point the State Energy Plan toward lower projected generation capacity than we believe is necessary for the State, and thus mask the very urgent need to bring new plants on line over the next five years. (See Draft State Energy Plan, page 3-5.)

Response: The Energy Plan projects continuing growth in demand for electricity and recognizes the need for additional generation. See the State Energy Plan, Section 3.4, Electricity Assessment. Proposed additional natural gas fueled plants will help meet the future demand as will Peak Load Reduction and other demand reduction programs discussed in the Energy Plan.

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The Business Council of New York State, Inc.

We believe the impact on the cost of energy with respect to such environmental initiatives should be studied and quantified. The State Energy Plan includes no acknowledgment of the economic cost of environmental regulations. For example, there seems to be no accounting for the impact of the Acid Deposition Reduction Program (ADRP) on energy costs or generating capacity even though the Energy Plan recognizes that some coal plants may be closed or have their operations reduced because of the ADRP.

Response: The various scenarios considered in the State Energy Plan, Section 3.4, the Electricity Assessment, include assumptions about facility modifications and retirements that could occur to comply with the requirements of the Governor's Acid Deposition Reduction Program. These assumptions were included as "givens" in the analyses. The analyses indicate that – with the modifications and retirements included – statewide average wholesale electric energy prices, based on trends in locational-based marginal prices, in the State should decline as new resources are added during the planning period. The Energy Plan does not attempt to determine the economics of operating individual units.

Long Island Coalition for Democracy

NYSERDA repeats data in its draft report from utilities and industries and other governmental agencies to make projections over 20 years without seriously trying to change the current climate of energy use in New York State.

The final Energy Plan should have performance profile graphs showing how much each of the State's utilities, over a 5 year period, spent on fossil fuels, purchased power, operation and maintenance, the size of debt for each, any new borrowings, each utility's yearly debt payment and the total amount spent annually on renewable energy.

Response: The State Energy Plan supports fuel diversity. Performance profiles for publicly-owned and investor-owned utilities can be found in *Financial Statistics of Major U.S. Publicly Owned Electric Utilities, 2000*, published by the U.S. Department of Energy, Energy Information Administration, and in the annual reports filed by the investor-owned utilities with the New York State Public Service Commission.

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NRG Energy Inc.

NRG would prefer that the draft present more detailed information pertaining to its electric resource assessment.

The Energy Plan assumes a large number of new combined cycle natural gas plants by 2005. Consideration should be given to the question of whether the State is relying too much on new generation in the State to meet the anticipated energy demand.

The Energy Plan appears to rely more so on somewhat speculative alternative and renewable fuels development and energy efficiency technology, rather than on developing policies that maintain and enhance fuel diversity.

The draft Energy Plan describes the results predicted by the Reference Resource Case and notes that the change in generation from coal and oil sources is due, in major part, to New York's Acid Deposition Initiative program. It is not clear what assumptions were used to arrive at this conclusion. Moreover, there is an inconsistency between the aforementioned conclusion and the discussion on future coal use.

Response: The State Energy Plan features consistent coal forecasts throughout the document that account for the decrease in coal burning as a result of the Acid Deposition Reduction Program.

Energy efficiency measures have had a positive impact on electricity demand. See the Energy Efficiency Assessment, Section 3.2 of the State Energy Plan. The State supports renewable energy resources and technologies, and all supply forecasts are based on proven technologies and fuels. The State supports environmentally sound re-powering of electric generation plants.

New York State Electric and Gas (NYSEG)

NYSEG believes the Draft Energy Plan is unrealistic in the following areas:

- Projections of declines in wholesale and retail electricity prices;
- Projections of declines in wholesale and retail natural gas prices;
- Projections of declining air emissions statewide associated with electricity will decline as a result of new natural gas fueled generation;
- Projections that the natural gas and electric bulk transmission system will receive the capital infusions and regulatory approvals needed to meet the growth in the State's energy economy.

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NYSEG suggests that several concerns be addressed prior to the issuance of the final Energy Plan.

The Energy Plan needs to critically assess the likelihood that the massive capital investment in new generation in the State will come to fruition, and the impact to the Energy Plan if certain or all the projected facilities are not built.

Emission reductions cannot be met without a monumental increase in the use of natural gas. The Energy Plan forecasts of lowered electric retail electricity and natural gas prices rely completely on the assumption of stable or declining wellhead gas prices forecast in a single study by the Federal Energy Information Agency. The Energy Plan entertains no alternative scenarios.

The Energy Plan is silent on where the massive increase in gas transmission system capacity will come from. The Energy Plan fails to directly and fully assess the electric and gas system reliability issues associated with the proposed massive increase in reliance on natural gas.

Response: The scenarios presented in Section 3.4, the Electricity Assessment, of the State Energy Plan, provide a range of possible energy futures. Some of the scenarios project increased wholesale electric energy prices and emissions, while others project decreased wholesale electric energy prices and emissions. In fact, the “Reference Resource” scenario projects decreases in wholesale electric energy prices and emissions as new resources are added and then increasing wholesale electric energy prices and emissions when no new resources are added. It is unclear why the comment indicates a belief that the addition of new, more efficient resources will not off-set less efficient, more expensive resources.

The State fuel demand and retail price forecasts are based on forecast data from the Energy Information Administration’s (EIA), *Annual Energy Outlook 2002 Forecasts for the Mid-Atlantic and the New York Control Area*. The forecasts assume that supplies are adequate.

Three scenarios, an Outlook, a Low, and a High case, were examined for the State Energy Plan. In developing its forecast, the EIA compared its forecast of natural gas wellhead prices in 2015 (\$3.07 per thousand cubic feet in 2000\$) to forecasts prepared by DRI-WEFA and the Gas Research Institute (respectively \$3.23 and \$2.34 per thousand cubin feet in 2000\$). The comparison revealed that EIA’s forecast is within the range of

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the forecasts prepared by these other entities. The State Energy Plan uses significantly lower overall growth in gas demand (1.3 percent per year in the Outlook Case) than the draft State Energy Plan used (2.3 percent per year) primarily because of projected reductions in the amount of gas needed to generate electricity. The Energy Plan identifies the need for an increase in gas transmission capacity to be provided by market participants.

The joint NYSERDA/NYISO study, *The Interaction of the Gas and Electric Systems in New York State*, examined the ability of the gas supply infrastructure to meet both core gas demands and the demands of future gas-fired generation consistent with the amount forecasted in the Energy Plan, *i.e.*, up to approximately 4,495 megawatts of new capacity by 2005. The study also incorporated a model of the current gas supply infrastructure and added, through various scenarios, up to 800 million decatherms per day of new pipeline capacity. This rather conservative approach incorporated various levels of capacity up to a maximum level that includes those pipelines that have received provisional approvals by the Federal Energy Regulatory Commission.

The results show that New York has sufficient gas capacity to deliver the minimum amount of gas required for generation under all the 2005 generation and pipeline expansion scenarios that were analyzed, including those scenarios in which pipeline expansions were limited to those currently under construction. This result is largely because the new gas-fired combined-cycle generators are more efficient than the existing gas-fired single-cycle units. In the full scenarios, *i.e.*, 800 million decatherms per day of new gas supply and 4,495 megawatts of new gas-fired generation, pipeline capacity is sufficient to meet the unrestricted demands of the new generators. Under scenarios with combinations of less pipeline expansion capacity and less additional generating capacity, a substantial portion of the maximum potential gas demands for generation can be met. Some oil needs to be burned in each case where less than 800 million decatherms per day of pipeline expansion is projected, but the total estimated amount of oil burned is less than the historical amount actually burned in 2000 and 2001.

Citizens Campaign for the Environment

The Energy Plan should provide estimates on all remaining fuel supplies similar to those provided for coal.

Response: An assessment of remaining fuel supplies is not required by the Energy Law. However, the Energy Plan estimates remaining crude oil reserves at one trillion barrels (See Section 3.6, Petroleum Assessment) and estimates of potential reserves of

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natural gas in the lower 48 states at 1,026 trillion cubic feet (See Section 3.5, Natural Gas Assessment). The *International Energy Outlook 2002* estimates worldwide natural gas reserves at 5,451 trillion cubic feet. All estimates of this type are based on the best information available at this time.

Honorable Paul D. Tonko, Chair, Assembly Energy Committee

The Energy Plan is effusive in its praise of the Governor's deregulation of electric power markets, implying that there are substantial rate reductions attributable to having created competitive markets. In truth, in much of the State the markets are not truly competitive. The plan does not obfuscate the true situation of market development. The Energy Plan mis-portrays recent energy price reductions as a result of competitive market activities. (See page 5, "In summary," paragraph).

Response: Restructuring has resulted in significant savings, and an increasing number of customers are taking advantage of competitive offerings. While wholesale markets in New York City and on Long Island have not become fully competitive, the State has supported, and the Federal Energy Regulatory Commission has approved, mitigation measures to moderate price spikes due to market power. The State continues to work on infrastructure and market issues as discussed in the Electricity Assessment.

Transmission Planning

New York Independent System Operator (NYISO)

As described in the draft State Energy Plan, the long-term adequacy of the New York State bulk power system is dependent on both new supplies of electric power and on the expansion of the transmission system to deliver the power needed for New York's economy. To achieve these ends will require the implementation of a comprehensive transmission planning process and the development of an appropriate cost recovery mechanism. Currently, one of the major barriers to expanding the transmission system is the uncertainty associated with cost recovery. The NYISO's long term transmission planning objective is to ensure that New York State develops and implements an effective transmission planning process. The NYISO would encourage the State to engage actively in proceedings occurring at the regional and federal levels pertaining to transmission planning and to support market-based solutions to transmission enhancement and expansion needs.

Response: The State was a leading advocate for transmission planning long before other participants in the NYISO were willing to agree that such a NYISO-based function

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is appropriate. The Public Service Commission has not only advocated planning and construction of appropriate transmission facilities, but it has also advocated that a move to a regional common market will assist in the beneficial expansion of transmission. New York will continue to participate in regional planning proceedings.

Honorable Paul D. Tonko, Chair, Assembly Energy Committee

The draft State Energy Plan is incomplete in terms of providing the results of several ongoing studies. The plan draws its conclusions from incomplete and cursory analyses. The prime example is the in-progress study of the natural gas infrastructure and its impacts on the developing competitive electric generation market.

Response: The State Energy Plan includes the results from the joint NYISO-NYSERDA gas and electricity study, *The Interaction of the Gas and Electric Systems in New York State*, preliminary results from the *Efficiency and Renewable Energy Potential Assessment*, and the recommendations of the Department of Environmental Conservation's Environmental Justice Task Force.

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