



Protecting the environment and
working for a healthy community.

☐ 225A Main Street • Farmingdale, New York 11735
Tel: 516-390-7150 • Fax: 516-390-7160

☐ 19 Court Street, Lower Level • White Plains, New York 10601
Tel: 914-997-0946 • Fax: 914-997-0983

☐ 744 Broadway, Lower Level • Albany, New York 12207
Tel: 518-434-8171 • Fax: 518-434-8172

☐ 3144 Main Street • Buffalo, New York 14214
Tel: 716-831-3206 • Fax: 716-831-3207

☐ 466 Westcott Street, 2nd Floor • Syracuse, New York 13210
Tel: 315-472-1339 • Fax: 315-472-1179

Jaclyn A. Brillling Secretary
New York State
Public Service Commission
3 Empire State Plaza
Albany, New York 12223-1350

2

April 4, 2005

Dear Secretary Brillling,

RE: CASE 05-M-0090

Citizens Campaign for the Environment (CCE) is an 80,000 member, not-for-profit, non-partisan advocacy organization working to protect public health and the natural environment throughout New York State and Connecticut. CCE operates **from** five regional offices across New York and interacts with New York and Connecticut residents to advance sound environmental policies throughout the year.

Understanding that power generation **from** polluting, non-renewable resources has serious impacts on human health, wildlife, plants and the natural environment, CCE works on energy policy and renewable energy as a primary program area. CCE recognizes that the long list of detrimental consequences **from** our reliance on fossil fuel combustion and nuclear fission includes: acid rain, urban smog, high rates of lung diseases and heart failure, oil spills, contaminated **drinking** water, rising sea levels, mining impacts, global warming, ecosystem damage, nuclear waste disposal, national and global depletion of finite energy sources, and conflicts over the world's dwindling non-renewable resources. CCE believes that the work done by New York State Energy Research Development Authority (NYSERDA) funded through the Systems Benefit Charge (SBC) to advance energy efficient practices and technologies and renewable energy research, development, and use has launched New York State into the **forefront** of efficient, clean, and green energy policy. With the adoption of a Retail Renewable Portfolio Standard (RPS) in September 2004, New York codified its commitment and set an attainable yet ambitious goal of 25% of retail electricity sold in New York being generated **from** renewable sources.

CCE opposes the budget amendment adopted by NYS legislature (S.3669/A.6843). CCE strongly supports continued funding of NYSERDA and the implementation of the RPS. CCE believes that applying SBC funds to "public policy energy programs" weakens New York's strong renewable energy policies. By failing to ensure that SBC funds go

directly to NYSERDA, the legislature restricts the NYSERDA's ability to initiate and ensure duration for **long-term** programs for developing renewable energy. Specifically, CCE is concerned that these proposed changes would adversely impact the goals of NYSERDA and RPS implementation for the following:

- **Open the door for diverting revenue generated by the SBC.** The real possibility exists that revenue generated by the SBC, which was created under the auspices of funding NYSERDA, will be diverted to other programs which may not enjoy the same high levels of public support that exist for investing in renewable energy. Any siphoning off of monies for renewable energy will slow the pace of progress towards 25% of New York's retail energy being generated from renewable sources.
- **Lost public confidence.** One ancillary impact to being under constant threat of being de-funded is a loss of public confidence that SBC programs are permanent. New York State's strong commitment to renewable energy development is a critical component to achieving RPS goals.
- **Unnecessarily bureaucratic.** CCE is satisfied with the current process of approval for programs by the NYSERDA board of directors. Requiring additional annual approval of funds by the politically appointed director of the budget simply adds an unnecessary layer of government.

Thank you for your thoughtful consideration of our comments.

Sincerely,



Emmett Pepper
Program Coordinator