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To: Jaclyn A. Brillling  
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CASE 05-M-0090

This letter is to comment on the "Staff Proposal for the Extension of the System Benefits Charge (SBC) and the SBC-Funded Public Benefit Programs". I would like to express my support for the conclusions of the Staff Proposal and for the extension of the SBC.

Specifically, I suggest enhancement of the SBC-funded programs designed to provide incentives for renewable energy sources. I suggest extending current NYSEDA wind power installation incentives to include medium scale (100 - 1000 kW) generation, and I suggest extending net metering to retail (or near retail) prices for wind power generation up to 1000 kW.

Wind power technology, as a distributed generation source, is environmentally friendly and economically competitive with fossil fuels. However there are several major barriers which currently hinder its development in New York State. In particular, due to the lack of net metering guarantees, grid-connection for wind generation facilities of the medium size range (100-1000 kW) is economically unattractive. In addition, NYSEDA programs only offer installation incentives for groups that fall into the defined sectors of "Business, Institutional, Farm, or Educational".

"Medium wind" (100-1000 kW) is an important new potential market in renewable energy generation sources. To overcome initial capital investment costs, economies of scale are possible in community-based cooperative wind turbine construction projects, and such projects will often fall in the 100-1000 kW range. With no incentives to build projects in this size range, and with grid-connection barriers that make it economically unfeasible, community cooperatives will be dissuaded, and the potential for distributed wind power generation will remain crippled for the foreseeable future.

Removing the barriers to grid connection for medium-scale wind projects, guaranteeing net metering at or near retail levels for cooperatives, and creating new installation incentives for medium wind projects will greatly improve the infrastructure and expand the market for this important renewable energy source.

As noted by the Staff Proposal, "The emergence of the Renewables Portfolio Standard (RPS) program has addressed funding needs for incentives for increased generation from renewable resources. However, there remains a continued need to enhance New York's renewable resources infrastructure. This would include activities such as promoting renewable resources, ...market development, etc...These are appropriate SBC functions as they

have not been supplanted by the RPS program and are not being provided by the competitive electricity market."

My suggestions address the need for increased renewable energy infrastructure to meet the Renewables Portfolio Standard (RPS), and support two of the Staff Proposal recommendations:

- Improve New York's energy system reliability and security by reducing energy demand, supporting innovative transmission and distribution technologies, and enabling fuel diversity, including renewable resources.
- Mitigate the environmental and health impacts of energy use by increasing energy efficiency, encouraging the development of a renewable energy resources infrastructure, and optimizing the energy performance of buildings and products.

I am impressed by the Staff Proposal's report on the economic and environmental successes of past SBC-funded programs, and I am excited by the possibility of future programs for medium wind.

Thank you very much,

Beth Ellen Clark

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