

**Before The
New York State
Public Service Commission**

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**Joint Petition of IBERDROLA, S.A.,
Energy East Corporation, RGS Energy Group, Inc.,
Green Acquisition Capital, Inc.,
New York State Electric & Gas Corporation and
Rochester Gas and Electric Corporation for
Approval of the Acquisition of
Energy East Corporation by IBERDROLA, S.A.**
-----X

**AFFIDAVIT OF SERVICE
TESTIMONY OF
J. JARED SNYDER**

Case No. 07-M-0906

STATE OF NEW YORK:

S.S.:

COUNTY OF ALBANY

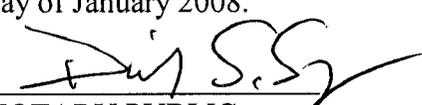
LYNNE COSHUN, being duly sworn and deposes says:

I am an employee of the New York State Department of Environmental Conservation, a party to this action.

On January 11, 2008, I served an original and five copies of the Testimony of J. Jared Snyder to the Honorable Jaclyn Brilling, Secretary, New York State Public Service Commission, by depositing the same in a United States Postal Box located at 625 Broadway, Albany, New York. Copies were transmitted electronically via e-mail of same on January 14, 2008 to those on the Active Parties List who accept electronic service, and hard copies were mailed on January 11, 2008 to those who indicated they do not accept electronic service.


Lynne Coshun

Sworn to before me this 14th
day of January 2008.


NOTARY PUBLIC

DAVID S. SAMPSON 02SA5013268
NOTARY PUBLIC, STATE OF NEW YORK
QUALIFIED IN RENSSELAER COUNTY
COMMISSION EXPIRES JULY 15, 19-2011

New York State Department of Environmental Conservation
Office of General Counsel, 14th Floor
625 Broadway, Albany, New York 12233-1500
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January 11, 2008

Honorable Jaclyn A. Brillig, Secretary
New York State Public Service Commission
Three Empire State Plaza, 14th Floor
Albany, New York 12223

RE: Iberdrola Acquisition Petition, Case 07-M-0906, Testimony of J. Jared Snyder

Dear Secretary Brillig:

Please find enclosed for filing an original and five copies of the testimony of J. Jared Snyder, Assistant Commissioner of the New York State Department of Environmental Conservation. Copies were sent to the Active Parties List by e-mail on January 11, 2008. Hard copies were provided to those who requested them.

Sincerely,



David S. Sampson
Assistant Counsel

Enclosures

c: Active Parties List

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**TESTIMONY OF
J. JARED SNYDER**

**Assistant Commissioner
New York State Department of Environmental Conservation**

January 11, 2008

J. Jared Snyder

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1 Q. Please state your name, address and current position.

2

3 A. My name is J. Jared Snyder and I am the Assistant Commissioner for Air
4 Resources, Climate Change and Energy at the New York State Department
5 of Environmental Conservation. My office is at 625 Broadway, Albany,
6 N.Y.

7

8 Q. Please summarize your background.

9

10 A. Prior to starting at DEC in May 2007, I spent 17 years as an
11 environmental attorney in Federal and State government. In the NYS
12 Attorney General's office from 1995 until May 2007, I was responsible
13 for litigation of a variety of air pollution and climate change cases, many
14 of which involved the power industry. I am a graduate of Harvard Law
15 School (1984) and Cornell University (1981), where I majored in
16 economics.

17

18 Q. What is the purpose in your testimony in this proceeding.

19

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1 A. I am testifying on behalf of DEC, which is a party to this proceeding. My
2 purpose in giving testimony is to encourage the Commission to help fulfill
3 Gov. Spitzer's energy policies in New York State, and to advocate policies
4 that will facilitate the reduction of emissions that contribute to global
5 climate change.

6
7 Q. What are the energy policies that you reference?

8
9 A. In April of 2007, Gov. Spitzer set forth a road map to a comprehensive
10 energy strategy for New York State. He cited three "seemingly intractable"
11 challenges faced by the state: rising energy bills, rising global temperatures
12 and a rising tide of young people leaving New York. His answer, in part, is
13 to: First, reduce electricity use by 15 per cent by the year 2015. Among
14 the means identified by Gov. Spitzer were the creation of new appliance
15 efficiency standards and setting more rigorous building codes. Second,
16 Gov. Spitzer has emphasized the need to promote renewable energy,
17 including investing \$295 million for renewable energy projects throughout
18 the state. Third, proposing last year power plant siting legislation that
19 would create an expedited review process for, among other things, new
20 wind power projects.

21

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1 Q. How do those policies relate to the petition by Iberdrola?

2

3 A. Iberdrola has substantial expertise and experience concerning the
4 development of wind energy. Iberdrola, for example and by its own
5 account, is the largest producer of wind energy in the world, and has
6 invested more than \$1.32 billion in renewable resources throughout the
7 world. Iberdrola has also committed to a strong interest in helping to
8 achieve New York State's goal of 25% more energy generated by
9 renewable resources. "We hear loudly and clearly that expansion of
10 renewable resources is a major agenda item in New York State," Iberdrola
11 said in its petition.

12

13 Q. Is DEC then endorsing Iberdrola's application?

14

15 A. We support an outcome that would take full advantage of the potential
16 offered by Iberdrola for the siting of clean and renewable energy in New
17 York. In its determination, we call on PSC to give due consideration to
18 Iberdrola's experience exercise in developing renewable energy.

19

20 Q. Why is wind energy so important as an energy resource?

21

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1 A. As the New York State Energy Research and Development Authority
2 notes, wind energy is a key component of a clean energy future for New
3 York. Wind turbines can be used to produce electricity for a single home
4 or they can be connected to an electricity grid. They can be combined with
5 other renewable energy technologies. New York State is responsible for
6 about 1% of the world's carbon emissions. New York is taking many
7 steps to reduce these emissions, including Governor Spitzer's program to
8 reduce energy use by 15% by 2015, and the proposed 6 NYCRR Part 242
9 and 21 NYCRR Part 50, which will implement our commitment to the
10 Regional Greenhouse Gas Initiative.

11
12 Q. How does promoting wind power contribute to the fulfillment of the
13 State's climate change policies?

14
15 A. Fighting climate change is without question the most substantial
16 environmental challenge facing this State, this nation and the world today.
17 Governor Spitzer and Commissioner Grannis have made the fight against
18 climate change a top priority. Taken together with our other initiatives,
19 development of wind energy is vital to the reduction of greenhouse gases.
20 For each 100 megawatts (MW) of electricity generated from fossil fuels
21 that is displaced by wind power, approximately 500,000 to one million

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1 tons of carbon dioxide emissions are avoided annually, depending on
2 whether that power would otherwise be generated by natural gas or coal.

3
4 The latest assessment of the International Panel on Climate Change
5 (IPCC) describes the technical and economic potential for stabilizing
6 atmospheric concentrations of heat-trapping gases near the CO2 equivalent
7 of 450 ppm. To achieve this stabilization level, scientists estimate that
8 global CO2 emissions will need to peak by 2015, and then be reduced 50-
9 85% below year 2000 emissions levels, by 2050. Global climate models
10 suggest that achieving this atmospheric CO2 equivalent concentration will
11 limit the future global mean temperature increase to 2.0-2.4 degrees above
12 pre-industrial temperatures, a temperature increase that many scientists
13 believe significantly reduces the likelihood of the most severe impacts of
14 climate change.

15
16 A dramatic increase in wind energy capacity is a necessary component of a
17 strategy to meet this climate stabilization goal. Princeton University
18 scientists Pacala and Socolow, developers of the "stabilization wedges"
19 concept that illustrates the scale of emissions cuts needed to stabilize
20 future atmospheric CO2 concentrations, suggest that for wind energy to
21 supply approximately 10% of the clean energy needed to stabilize global

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1 CO2 emissions at *current* levels, worldwide deployment of more than 2
2 million large capacity wind turbines will required by 2050. However,
3 because reductions in global CO2 emissions in the range of 50-85% are
4 needed by 2050 to achieve the desired atmospheric CO2 equivalent
5 stabilization level of 450 ppm, much additional wind capacity will
6 required beyond that level.

7
8 Q. Are there other environmental benefits attributable to the expansion of
9 wind power?

10
11 A. The expansion of wind power has multiple environmental and public
12 health benefits. Generating electricity from non-emitting sources of
13 renewable power rather than the combustion of fossil fuels reduces the
14 emission of pollutants that cause ground level ozone and fine particulate
15 matter, pollutants that lead to elevated levels of illness and death from
16 respiratory and heart disease. For example, every 100 megawatts of
17 energy generated annually from wind turbines rather than modern coal
18 burning technology reduces annual emissions of sulfur dioxide by
19 approximately 500 tons, and emissions of nitrogen oxides by
20 approximately 175 tons annually. In addition to contributing to adverse
21 health effects, emissions of sulfur dioxide contribute to acid rain.

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1 Furthermore, the combustion of coal in coal-fired plants produces mercury
2 emissions that contribute to the elevated levels of mercury in fish found in
3 New York's waters. Finally, natural gas production operations result in
4 the leakage of methane, a potent greenhouse gas. In contrast, wind power
5 is a clean source of energy with no emissions.

6
7 Q. How much of a role does wind energy play in the state today?

8
9 A. New York State is currently home to 6 windmill farms producing about
10 424 megawatts of power. At least three more are in the planning stages.
11 As Gov. Spitzer has said, "We're not coal country, like West Virginia.
12 And we may not have the oil fields of Texas and Alaska. But we have an
13 abundance of wind, water and solar, positioning us to develop renewables
14 as a greater part of our domestic energy supply."

15
16 Q. What is DEC's main point to be made through this testimony?

17
18 A. We would like to suggest that the PSC not automatically foreclose
19 Iberdrola's development and ownership of wind energy holdings in New
20 York State and that it find a way to work with Iberdrola in encouraging
21 more wind energy projects. We ask that you consider Iberdrola's

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1 outstanding record of promoting renewable energy in the context of the
2 Governor's 2007 call for a holistic and comprehensive approach to an
3 energy strategy and the need to reduce greenhouse gas emissions
4 substantially, and explore alternatives that would allow the state and its
5 citizens to take advantage of Iberdrola's vast wind energy experience.

6
7 Q. Does this complete your testimony?

8
9 A. Yes, it does.