



VIA COURIER & E-MAIL

September 25, 2003

The Honorable Jaclyn Brilling
Secretary
New York State Department of Public Service
Three Empire State Plaza
Albany, NY 12223-1350

**Re: Proceeding on Motion of the Commission Regarding a
Retail Renewable Portfolio Standard (Case 03-E-0188)**

Dear Secretary Brilling:

The Independent Electricity Market Operator (IMO) appreciates the opportunity to provide further comments in respect of the above-noted matter. The IMO repeats and relies upon its earlier submission that was filed on March 28, 2003.¹ The key aspects of the IMO's earlier submission include:

- (a) **Types of resources that should be considered as renewable.** The IMO favours investments in a diverse mix of generation resources, and encourages the Commission to consider a balanced approach to establishing New York's renewable resource mix. The IMO submits that the Commission should consider such factors that will promote development of a diverse mix of resources and will also maximize the deployment of economically viable renewable resources and generation attributes trading within, between and through our respective markets.
- (b) **Appropriateness of including renewable resource energy procured from outside the state.** The IMO supports the view that generation should be able to reach available markets. Accordingly, the IMO believes that cross-border electricity and attributes trade should have the same benefit of access principles that apply to intra-jurisdictional electricity trade.

¹ Comments of the Ontario Independent Electricity Market Operator, Case 03-E-0188, ¶¶ Proceeding on Motion of the Commission Regarding a Retail Renewable Portfolio Standard, March 28, 2003.
http://www.theimo.com/imoweb/pubs/corp/E-0188_IMO-Comments_NY-RPS_20030328.pdf

- (c) **Appropriateness of a renewable attributes trading system.** The IMO supports the view that development and adoption of a common platform, and associated business standards and practices to track generation attributes and facilitate certificate trading will help to harmonize trades between and through our respective markets.

The IMO reserves its right to submit further comments in respect of this proceeding.

ALL OF WHICH IS RESPECTFULLY SUBMITTED BY,

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Corporate and Legal Affairs
Independent Electricity Market Operator