



Union of Concerned Scientists
Citizens and Scientists for Environmental Solutions

September 26, 2003

The Honorable Jaclyn Billing
Secretary
NYS Public Service Commission
Three Empire State Plaza
Albany, NY 12223

Re: Proceeding on Motion of the Commission Regarding a Retail Renewable Portfolio Standard Case 03-E-0188; Comments from the Union of Concerned Scientists

Dear Secretary:

The comments on the motion of the Commission regarding a retail renewable portfolio standard submitted by the Renewable Energy Technology and Environmental Coalition (“RETEC”) on September 26, 2003 represent the hard work on a very complex issue completed by a broad coalition through an open and collaborative process. RETEC should be commended for its efforts.

The Union of Concerned Scientists (UCS) joined the RETEC coalition at its inception this past Spring. UCS participated in the development of RETEC’s initial comments to the Public Service Commission (PSC) dated March 28, 2003. We also gave a presentation to all stakeholders at the collaborative meetings held April 7-8, 2003.

Unfortunately, due to resource and workload constraints, UCS was not able to join the summer-long working group sessions organized by the PSC, nor were we able to actively participate in the collaborative process and discussion of specific issues through which RETEC’s most recent comments were developed. We have read RETEC’s comments and believe that overall, they represent a thoughtful and balanced set of recommendations that are

likely to result in a strong and successful RPS implementation in New York. We have therefore signed on to the RETEC comments and urge you to give the recommendations your serious consideration. However, like other signers, we reserve the right to take different positions on its specific components in this proceeding or in other policy arenas as future opportunities arise.

UCS also commends the Bioenergy Working Group for its extremely thorough and detailed assessment of the issues and its innovative recommendations. Biomass resources pose unique and complex environmental and sustainability challenges, while also offering significant environmental, fuel diversity, security and economic development benefits.

UCS has strongly supported the development of biomass standards that allow and support industry to grow, while requiring continuous improvement on measures of environmental impact and sustainability. Not having participated in the discussions, nor having had the time to do a detailed assessment of the recommendations, we do not yet have an independent conclusion as to whether the standards are stringent enough over the long-run to ensure sustainability, or so stringent in the near term as to potentially preclude biomass development in New York.

The active participation in the discussions of the very knowledgeable group of biomass advocates, environmental advocates and government agencies, makes us optimistic that the standards are appropriate and achievable. If they are achievable, these standards would go far to increase public acceptance of bioenergy use not only in New York, but nationally.

We therefore endorse the adoption of the proposed standards at this time, with a reevaluation after the RPS has been in effect for two to three years as to how effective the standards have been in promoting biomass development that is increasingly sustainable.

Respectfully,

/ s /

Alan Noguee

Director, Clean Energy Program

cc: Hon. Eleanor Stein (electronically, via email list server for the proceeding)
Active Parties (electronically, via email list server for the proceeding)