

STATE OF NEW YORK
PUBLIC SERVICE COMMISSION

CASE 03-E-0188 – Proceeding on a Motion of the Commission Regarding
A Retail Renewable Portfolio Standard

Comments the Recommended Decision
Antares Group, Inc.

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Antares Comments on the Recommended Decision:

The term "developed" should be clarified to mean that development is complete through permitting and operational testing and the units are prepared to enter commercial service. This clarification is needed because there are a number of important renewable energy facilities in New York that have been in an R&D status or precommercial development status for several years. If these projects go into commercial service they will be an important part of the new incremental renewable resource that the RPS is designed to encourage.

The biomass working group worked very diligently to strike a balance between the broad eligibility of biomass as a renewable resource and constraints necessary to assure that the environmental benefits desired for the RPS are achieved. We note that some of the precepts for sustainable harvest, resource production and accounting agreed to in the working group are included (under "other requirements" for manure digester systems, cofiring, harvested wood, and silvicultural waste wood). We believe that the other recommendations of the committee also have merit and do not unduly restrict biomass use as a resource. It would be prudent to give them further consideration in the development of the final RPS framework.

Separate from the deliberations of the working group, Antares believes that Sustainable Yield Wood and Herbaceous crops (energy crops) merit the same SBC tier treatment as small wind, hydro and fuel cells. They represent new technology in the biological sense for converting sun and nutrients to renewable energy and materials. NYSERDA, DOE, and many other University and Private partners have made significant investments (traditional crossbreeding for productivity, new planting equipment, new harvesting and processing equipment) to bring these crop systems to the point where they can begin to make a contribution to energy supplies. An establishment incentive grant based on capacity (1.7 kW per acre at current growth and energy conversion rates) would assure that these new renewable resources can begin to be developed in New York.

Edward E. Gray
President
Antares Group Incorporated