

Talking Points for PCS Hearings

Set aggressive energy efficiency goals.

The Clean Energy Standard proposal assumes a very modest decrease in electricity demand due to energy efficiency, but sets in place no mandate that utilities invest in energy efficiency retrofits. Energy efficiency is a key component of a low-carbon energy system. It is the most affordable way to reduce greenhouse gas emissions and displace fossil fuel and nuclear generators. In addition to being required to purchase renewable energy, utilities should be mandated to invest in energy efficiency retrofits for their customers in order to achieve aggressive demand-reduction goals. The State Energy Plan calls for a 23% reduction in energy use in buildings by 2030, but so far this is not enforceable on the utility companies.

Ensure in-state, locally owned, and community-owned renewable energy production.

The proposal for the Clean Energy Standard would allow utilities to meet their obligations by buying out of state renewable energy, limited to energy production areas that border New York State. However, whenever possible, it's better for ratepayers if their dollars stay in New York and support local renewable energy development. The report [Advantage Local: Why Local Energy Ownership Matters](#), produced by the Institute for Local Self Reliance illustrates why it's important for Renewable Portfolio Standards to promote local ownership. The report found that when compared to out-of-state renewable resources, in-state-owned renewables create exponentially more jobs, contribute more to local economies and meet less local resistance.

Ensure Energy Affordability.

[According to a report from 2013](#) (the last time New York State studied the issue), the 1 million households living under the federal poverty level paid more than 22% of their income toward their energy bills. Nearly half of those households paid more than 40% of their income toward energy bills. Even moderate income households at 200% of the federal poverty level showed energy burdens above the 6% energy affordability threshold. Affordable energy continues to be out of reach of low and moderate income New Yorkers. In 2014, 177,000 households saw their utility bills shut off for nonpayment.

Unless New York implements a progressive rate structure - one that ensures affordability for low-income households - the burden of subsidies for the nuclear and renewable energy resources supported through the Clean Energy Standard will fall disproportionately on low-income households. The Public Service Commission is currently considering a proposal to improve utility low-income discount programs. But that underfunded and narrow proposal will be inadequate to ensure affordability for all low-income New Yorkers even at today's energy rates. With billions more added to bills for nuclear bailouts and unknown costs for renewable energy credits, it's critical

that the PSC consider how to bake progressive rates into the Clean Energy Standard itself.

Support off-shore wind.

New York has enormous offshore wind potential off the coast of Long Island. Most observers agree that New York will be hard pressed to meet its renewable energy goals without tapping into that abundant resource. Very little offshore wind has been developed in the United States, so the industry is still in the early phases. It will take several years to develop this resource, and initial investment of public money will be needed to jump-start the industry. The Clean Energy Standard should have a tier dedicated to offshore wind to ensure development begins in the near-term. If New York manages to become a leader on offshore wind, the state will have a good chance of building the supply chain for what is likely to be a huge and growing industry in the U.S. This could lead to a growth in manufacturing jobs in New York to supply this industry.