

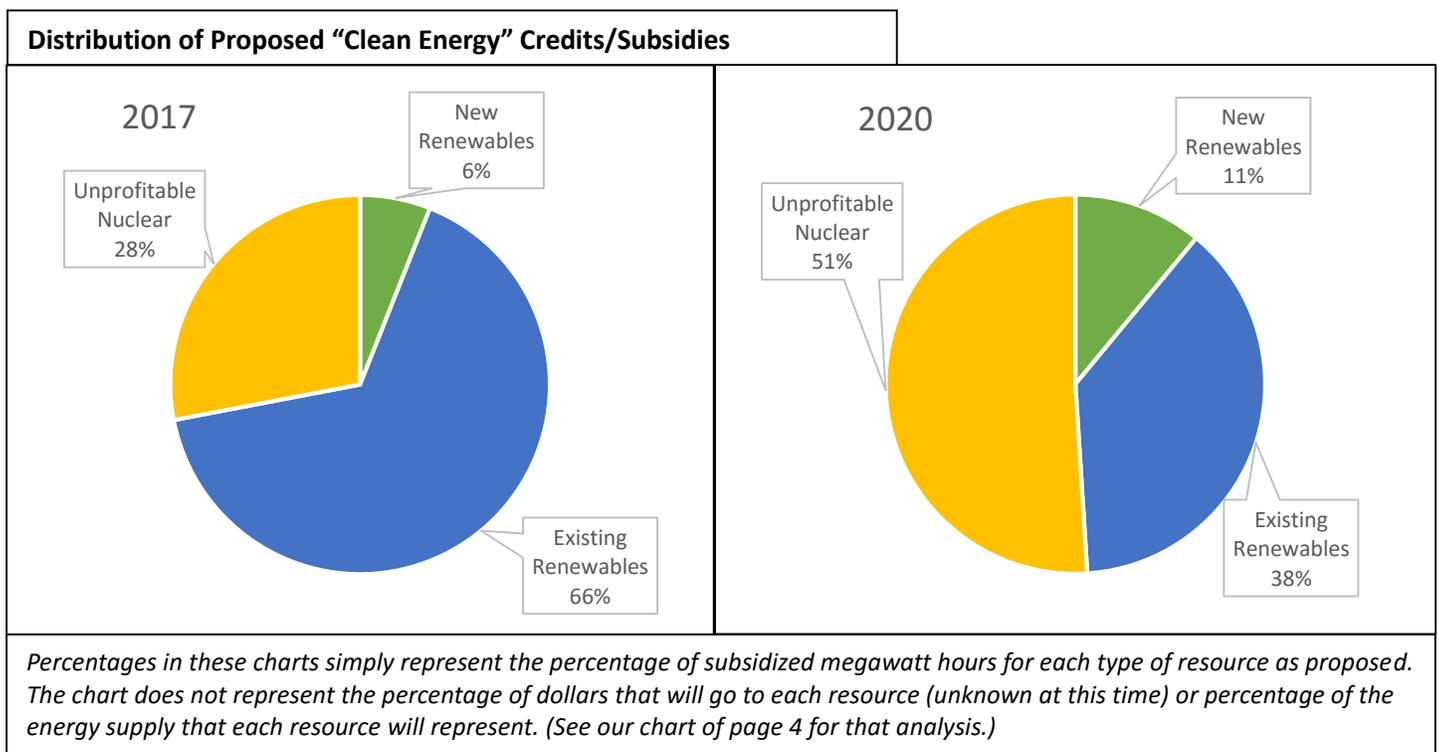
Cuomo’s “Clean Energy Standard” Would Provide Modest Support for Renewables and a Big Blank Check for Nukes

The New York **Public Service Commission (PSC)** is considering a proposal to require **utility companies** to buy increasing amounts of electricity from renewable *and* nuclear sources, under a plan called the “**Clean Energy Standard.**”

In a nutshell, the proposed policy will set annual goals for the amount of renewable energy to be purchased in New York, claiming to ensure a steadily increasing market for renewable energy. Despite the fact that nuclear power is not clean or renewable, the proposed policy will also provide massive subsidies to unprofitable upstate nuclear reactors. It will require utilities to buy nuclear energy at **above-market rates** to cover their nuclear reactors’ rising operating costs.

The costs of the proposal would be passed on from utilities to consumers. The proposal does not currently include a cost estimate, though one will be released in coming weeks. We have little way to estimate the projected cost of the renewable portion of the proposal, but we estimate the nuclear portion could cost consumers on the order of \$3.5 billion in above-market subsidies to nuclear reactors between 2017 and 2030.

The Public Service Commission will accept comments on the Clean Energy Standard proposal over the next few months, with a decision due in June, 2016. Public hearings are being held throughout May and public comments are due June 6, 2016.



Summary

New York’s 2015 State Energy Plan calls for 80% renewable energy by 2050, with an interim goal of 50% renewables by 2030. It also calls for a 40% reduction in greenhouse-gas emissions in the state below 1990 levels by 2030.

Renewable Mandate: The proposed Clean Energy Standard would require utility companies and **Energy Service Companies (ESCOs)** to buy a certain percentage of the energy they deliver to customers from renewable sources.

The mandates would bring the portion of New York's energy supply that is coming from renewables to 26.8% by 2017 and 29.5% by 2020. Targets for future years will be set at a later date, and will grow to 50% by 2030.

New York has never before required that utilities buy any amount of renewable energy. The establishment of a utility mandate for renewable purchasing is a victory for the environmental community, which has long called for enforceable renewable energy targets.

The proposal would set a limit to how much the renewable mandates will cost by allowing utilities and ESCOs to pay a yet-to-be determined alternative fee instead of buying the requisite renewable energy. The PSC is soliciting comments on whether the money from that fee should be returned to customers or be used to promote renewable energy development.

Nuclear Blank Check: The proposed Clean Energy Standard also includes a gift to nuclear corporations operating in Upstate New York. Due to low electricity prices, declining demand, competition from wind power, and rising nuclear costs, New York's four upstate reactors have been struggling economically. Two are on the verge of closure unless they receive a financial lifeline. Tucked into the "Clean Energy Standard" is that lifeline. In addition to requiring that utilities and ESCOs purchase renewable energy, the policy would mandate that utilities buy 4.6% of the electricity they deliver in 2017 from nuclear reactors "facing financial difficulty." By 2020, utilities would be required to buy 15.7% of electricity from unprofitable nuclear plants.

Unlike the renewable energy mandate piece of the Clean Energy Standard, the nuclear mandate has no proposed cost cap. Customers would be required to pay whatever it takes to keep the nuclear plants in business, no matter how expensive that gets.

The nuclear energy purchased through the Clean Energy Standard would not count toward the 50% renewable energy goals, but is a separate mandate *in addition* to the renewables requirements.

Background

New York previously had a Renewable Portfolio Standard, which provided a vehicle for state investments in renewable energy with the goal of 30% renewable energy by 2015. That policy fell short of the goal. The percentage of renewable energy consumed in New York is around 26% currently, up only 7% from a base of 19% hydroelectricity in 2004 when the Renewable Portfolio Standard was established.

New York's previous Renewable Portfolio Standard did not place requirements on utility companies to buy renewable energy. Instead, it operated by using **ratepayer** money to subsidize the development of renewable energy that would be sold into the market, competing with all other fuels. The money was raised by adding a **surcharge** to the bill of every utility customer. Switching to utility mandates as the mechanism for achieving clean energy goals brings New York in line with other states with Renewable Portfolio Standards.

Public Service Commission (PSC): The state agency that regulates the investor-owned utilities in New York. The PSC sets energy rates as well as rules that utility companies must follow.

Utility companies: Private, for-profit corporations that own New York's electricity distribution system (the power lines that bring power to our homes.) These are the companies we pay our electricity bills to.

Above-market rates: New York has a competitive energy market that determines the amount of money that large generators (such as nuclear reactors, coal plants, gas plants, and large-scale wind and hydro dams) will be paid for their electricity. Sometimes, utilities or state entities pay generators more money than they would otherwise earn in the competitive market. These higher rates are known as "above-market" rates.

Intervenor: Also known as a "Party." An individual or organization that signs up to be an official participant in a Public Service Commission case. Intervenors' comments have more weight than "public comments."

Energy Service Companies (ESCOs): These companies compete with utilities to sell electricity to customers. They often claim to provide a better price or a higher mix of renewable energy. The PSC recently began a crackdown on the deceptive and predatory marketing practices practiced by many ESCOs.

Ratepayers: Another term for utility customers.

Surcharge: An extra charges on the energy bill on top of the costs for electricity or gas.

Where New York’s proposed Clean Energy Standard would differ from other states is in its support for nuclear power. New York policy has long held that nuclear plants are not eligible for subsidy through the Renewable Portfolio Standard. However, New York Governor Cuomo now wants to change course. Two nuclear plants in upstate New York – FitzPatrick and Ginna – have become unprofitable. FitzPatrick is reportedly projected to lose \$60 million per year, while Ginna requires approximately \$80 million per year to break even. Both reactors are slated to close in early 2017, unless the Governor succeeds in efforts to prop them up.

The other nuclear plant upstate – Nine Mile Point – is also potentially unprofitable. The company owning that plant told local media on March 31, that the plant was “losing a lot of money.” The Clean Energy Standard proposal contains enough nuclear credits to prop up Nine Mile Point Unit 1 starting in 2019 and Unit 2 starting in 2020.

Meanwhile, the proposal is designed to try to prevent the Indian Point nuclear power plant from being eligible for subsidies by applying the policy only to *currently licensed* reactors. Governor Cuomo has been working to prevent Indian Point’s two reactors from receiving new operating licenses from the Nuclear Regulatory Commission, and has been increasingly putting pressure on the plant to close. It is unclear whether this exclusion could withstand legal challenge. Indian Point’s owner, Entergy, has repeatedly said it expects Indian Point will benefit from the Clean Energy Standard.

By 2020, nuclear energy would be the most heavily subsidized resource in the state, if this proposal is approved.

How would the Clean Energy Standard Work?

The proposal sets up three “tiers” that utilities and ESCOs will be required to buy energy from. Tiers 1 and 2 are for renewable energy. Tier 1 is designed to support new renewable energy development, while Tier 2 is designed to provide support for existing renewable energy that is already built in New York. Tier 3 is set up to support upstate nuclear plants.

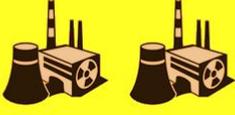
The state also counts on a large amount of existing, publicly-owned hydropower. The energy produced from state-owned dams would not be supported through either tier in the Clean Energy Standard. As a publicly owned resource, it doesn’t need utility support. This hydroelectricity would, however, count toward the state’s overall renewable energy goals.

Renewable energy production and purchase will be tracked using a “Renewable Energy Credit (REC)” system. For every megawatt-hour of renewable energy produced in New York, a “Renewable Energy Credit (REC)” will be created. Utilities and ESCOs will be required to purchase a certain number of RECs from new renewables in Tier 1 and a certain number from existing renewables in Tier 2. The Clean Energy Standard proposal would allow that to comply with the mandate, utilities and ESCOs could purchase RECs from renewables in neighboring states. The costs of RECs will largely be determined by the cost of renewable energy as compared to the market price of electricity in general, but could also be influenced by how much supply and demand there is for renewable resources and how the policy is designed.

Similarly, for every megawatt-hour of energy generated by “eligible” nuclear plants, a “Zero Emissions Credit (ZEC)” will be created. To comply with their Tier 3 mandates, utilities and ESCOs will be required to buy a certain number of ZECs. The cost of the ZECs will be determined by how much of a subsidy the eligible upstate nuclear reactors need in order to stay open. As nuclear costs go up, the cost of ZECs will also rise. **By 2020, nuclear energy would be the most heavily subsidized resource in the state, if this proposal is approved.**

To be eligible to receive ZEC payments, nuclear plants would have to be licensed through at least 2029 and would have to be losing money. This is the proposed method for carving Indian Point out of the policy. Indian Point’s licenses are currently expired and awaiting renewal by the Nuclear Regulatory Commission. New York is fighting the relicensing of the reactors, and is also engaged in numerous legal and regulatory attempts to shut down the plant. Entergy, the owner of Indian Point, is already arguing that its Indian Point reactors should be eligible for ZECs. Given the company’s propensity to sue states to protect its interests, there is a good chance Entergy would sue for inclusion of Indian Point.

Clean Energy Standard Proposed Tiers and Resource Allocations

		Utility purchase requirements as percentage of power they supply customers		
		2017	2020	Notes
Clean Energy Standard supported resources	Tier 1 - New renewables 	1%	3%	Utilities to purchase increasing amounts of RECs from new renewables
	Tier 2 - Existing renewables 	11%	12%	Utilities to purchase a fairly steady amount of RECs from existing renewables
	Tier 3 - Unprofitable nuclear 	5%	16%	Utilities to purchase increasing number of ZECs from nuclear plants because of the number of unprofitable nuclear plants is expected to rise through 2020.
		Estimated percentages of state power supply implied by proposal		
Other electricity generators	State-owned hydro 	15%	14%	State-owned hydroelectricity facilities form a base of renewable energy supply for the state. This power is sold through the NY Power Authority.
	Fossil fuels and profitable nuclear 	68%	55%	Fossil fuels to decrease 2-3% as new renewables come on line. Meanwhile, half the nuclear reactors in this category will become unprofitable and move to Tier 3 for subsidies.

How much will it cost?

Renewable Energy Credits: The Department of Public Service estimates the cost of the Renewable Energy Credits raise electricity bills by 0.5% to 1.06% in the first five years of the program, depending on whether the PSC requires utilities to enter into long term power purchase agreements. Power purchase agreements could dramatically bring down the costs of building large-scale renewable energy. Unlike fossil fuels and nuclear power, renewable energy costs are largely predictable. The fuel is free and maintenance is minimal. The majority of costs come during planning and construction. These up-front costs are usually financed over many years, creating a predictable and stable cost per year. Long-term power purchase agreements guarantee that renewable developers will be able to recover these predictable costs, rather than being subject to market fluctuations. By creating a predictable revenue stream and eliminating risk, power purchase

agreements reduce financing and other risk-related costs associated with renewable energy development. The proposal supports the use of long-term power purchase agreements by utilities, but not for all renewable energy development. The proposal suggests that mix of long-term power purchase agreements and other market-based procurement should be used.

Nuclear Zero Emission Credits: The cost of the nuclear tier is disputed this time. The Department of Public Service has estimated a cost between \$56 million and \$658 million for the first five years, but has refused to release the methodology behind that very wide estimate. Alliance for a Green Economy and the Nuclear Information and Resource Service have done our own calculation based on the facts that Ginna is losing about \$80 million per year and that FitzPatrick is reported to be losing \$60-70 million per year. In order to keep those two reactors going, ratepayers will need to provide at least \$140 million per year, and likely more to provide a profit margin for the reactor owners (who are in the business to make money for their shareholders). Over the 13 years projected by of the Clean Energy Standard, these two reactors alone will cost at least \$1.8 billion above market rates. The number of ZECs projected within the Clean Energy Standard proposal imply that Nine Mile Point 1 will begin receiving subsidies in 2019 and Nine Mile Point 2 will be subsidized starting in 2020. If these reactors cost the same as FitzPatrick, another \$150 million annually would be added to the ratepayers' bills, bringing the total over 13 years to \$3.5 billion. This assumes that current operating cost and subsidy levels stay the same. But if costs continue to rise and/or market electricity prices decline, the amount of subsidies required to prevent aging reactors from closing could rise substantially. (It should be noted that nuclear costs have been rising about 5% per year, on average, nationwide. Not enough is known about the specific costs of New York reactors to know how quickly their costs are rising, but the decisions to close two of the state's six reactors in quick succession suggests that their costs are at least in keeping with national trends.)

Policy Recommendations

Don't waste ratepayer subsidies on nuclear power.

The stated rationale behind the Tier 3 nuclear subsidies in the Clean Energy Standard is the unsupported assumption that New York cannot meet its 2030 greenhouse-gas reduction goals if the upstate nuclear plants are allowed to close "prematurely." This despite the fact that at least two of these reactors will inevitably close when their licenses expire in 2029, and will, presumably, need to be replaced with emissions-free resources anyway to meet the 2030 goals. New York's renewable energy development goals, as outlined in the proposal, are modest. The proposal assumes an average of less than 2% per year increases in the percentage of the electricity in New York coming from renewables.

The state could set more ambitious goals for renewable energy deployment, instead of propping up dirty, aging and dangerous nuclear plants. Doing this would have the added benefit of driving renewable energy resources to scale faster and bringing down costs more quickly. The questions for New York are these: Do we want to spend our money on an ever-more-expensive industry that will not contribute to our long-term renewable energy goals? Are we ready to put nuclear power behind us, to focus on building our future energy system and workforce now, and to stop throwing more and more money toward short-term and risky dead-ends? Every dollar we spend propping up nuclear reactors is a dollar that we could have spent building the long-term renewable energy economy. (More detailed nuclear talking points below.)

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.

Some More In-depth nuclear tier talking points

1. Nuclear energy is not clean

From cradle to grave, nuclear reactors pollute the environment and threaten human health. The uranium fuel used in nuclear plants is mined by a largely unregulated industry that poisons indigenous communities and communities of color in the U.S. and around the world. There are over 15,000 abandoned uranium mines throughout the United States which have never been cleaned up, predominantly in indigenous communities. After mining, uranium is processed into uranium dioxide ore at a mill; milling generates vast amounts of radioactive and toxic tailings that are deposited on the ground or in open ponds. The fuel is then enriched in an energy-intensive process. By the time fuel is delivered to a reactor for use, approximately 25,000 pounds of mining waste (rock, mill tailings, and depleted uranium) have been generated for each pound of nuclear fuel.

During power production, nuclear plants routinely as well as accidentally contaminate the environment through

discharges of radioactive waste to the air and water. Nuclear fuel emerges from the reactor approximately one million times more radioactive than when it enters, and must be isolated from humans and the environment for millennia, posing a risk with no storage solution in sight.

Proponents of nuclear energy like to call nuclear reactors “emissions free” because they do not emit carbon dioxide at the point of power generation. Yet, the nuclear fuel chain is responsible for carbon emissions during mining, milling, enriching, construction, transportation, and decommissioning. Reactors also routinely emit radiation, and the federal government allows them to do so as long as they stay under the government’s “legal limit.” However, “legal” does not mean “safe.” There is no safe level of radiation exposure. The Nuclear Regulatory Commission legal limit for radiation exposure to the public from the routine operation of a reactor is 100 millirem per year, a dose rate the agency believes to result in 1 additional cancer fatality per 286 people exposed.

Nuclear reactors also experience radioactive leaks and spills, which can contaminate ground water and surface water. Radioactive leaks are not an exception. In 2011, an investigation by the Associated Press found that almost 75% of nuclear plants in the U.S. had experienced a radioactive tritium leak at some point.

Every year, the US nuclear fleet generates approximately 2,000 metric tons of high-level radioactive waste. The federal government and the nuclear industry have spent decades looking for a permanent solution to dispose of this waste safely, and they have come up empty handed. The current plan is to leave radioactive waste on-site indefinitely. New York State will be dealing with the legacy of this waste for generations.

Three of four nuclear reactors in Upstate New York use once-through cooling systems, and each consumes roughly 800 million gallons of water daily. The water is used to cool the reactors and is then dumped back into Lake Ontario, causing thermal and radioactive pollution and killing aquatic life. The Indian Point reactors on the Hudson River in Westchester County consume about the same total amount of water (2-2.5 billion gallons per day), killing a billion fish and other organisms each year. Every two hours, Indian Point’s cooling system dumps as much heat as the Hiroshima bomb explosion into the Hudson River. Its water consumption is more than double that of New York City.

2. The CES proposal would hand a blank check to two huge corporations

Under the “Clean Energy Standard” proposal, nuclear companies will get the lion’s share of Clean Energy subsidies over the next few years. By 2020, nuclear power will be the most heavily subsidized energy source in New York. These subsidies will largely benefit Exelon Corporation, an Illinois-based, highly profitable company which owns three of the four nuclear reactors eligible to receive subsidies under the plan. If Entergy Corporation decides to continue operating its FitzPatrick reactor, that Louisiana-based company will also benefit. The companies will not be required to compete with each other or with other resources for these subsidies. Instead, the reactor owners merely have to show the Public Service Commission how much money they need in order to continue operating, and the cost of the subsidies will automatically be set to that amount. No other criteria will be used for setting the price of the subsidies, and there is no cost-cap proposed.

3. The nuclear subsidies steal money from renewables.

New Yorkers have a choice to make. With only so much money to go around, we need to be careful and smart about where we put our energy dollars. If we spend most of our subsidies on nuclear power, we won’t have much left to put toward supporting renewables. Nuclear energy costs are rising on average 5% per year across the U.S. because, at an average reactor age of 36 years, the national nuclear fleet is aging and becoming more expensive to maintain. Meanwhile the costs of renewables is coming down. The recent Public Service Commission case regarding the temporary bailout of the Ginna nuclear reactor near Rochester demonstrates just how expensive it is to extend the life of an old nuclear plant. Ginna needs at least \$50 per megawatt-hour to break even and approximately \$70 per megawatt-hour to achieve a viable level of profitability (even before costs go up 5% per year).

By comparison, energy efficiency measures cost a mere \$25 per megawatt-hours saved, according to Lazard’s 2015 “[Levelized Cost of Energy Analysis](#),” and unsubsidized wind in the Northeast has fallen to around \$55 per megawatt-

hour. Even utility-scale solar is becoming competitive with nuclear power, projected by Lazard to fall to \$60 per megawatt-hour by 2017. Continued investment in energy efficiency and renewables will drive costs down further, as has been demonstrated by the falling costs of these resources as they become more popular. With combined federal and state incentives, utilities in other parts of the country are obtaining wind under long-term contracts at \$25/MWh or less, and solar under \$40/MWh.

So New York can either invest in a future of falling energy prices and a cleaner energy supply, or in a future of rising nuclear rates and an increasingly dangerous and dirty reactor fleet. We think the choice is clear. Renewable energy is, in many cases, already less expensive than nuclear? and will also be a much better long-term investment for our state.

4. New Yorkers can't afford this expensive bailout.

The consumers who will bear the brunt of the high costs of the proposed nuclear bailout are low-income New Yorkers who already struggle to make ends meet. [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 1 million 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 for low and moderate income New Yorkers. In 2014, 177,000 households had their utility bills shut off for nonpayment. We simply cannot afford to be writing blank checks to corporations on the backs of the poor.

5. Nuclear plants are closing anyway, then what?

Investing in nuclear plants is not a long-term strategy or a bridge to a renewable energy future. The only way to achieve a renewable energy system is to actually build renewable energy and invest in energy efficiency retrofits to bring down the amount of energy needed.

The Governor and the Public Service Commission have claimed that upstate nuclear plants are necessary for meeting our greenhouse gas emission reduction goals of 40% by 2030. But they fail to mention that at least two of the upstate nuclear reactors (Nine Mile Point 1 and Ginna) will close by 2029 when their licenses expire. We need to be working now to replace those two reactors with carbon-free electricity, which means we need to be investing in their replacement, not in prolonging their lives. It's also likely that the other nuclear reactors will close in the near-term because of rising costs, ongoing equipment and safety issues, and the fact that no commercial nuclear reactor in the world has ever operated for 50 years. There is no reason to believe that reactors will remain economically or technologically viable through the end of their hyper-extended 60-year operating licenses.

6. (For those who don't want to oppose the Nuclear Tier outright)

If nuclear plants want to compete on a level playing field with other low-carbon resources, let them.

For years, the nuclear industry has been complaining that it is not valued for its contributions toward carbon-emissions reductions. They have asked to be put on a level playing field with wind and solar. But that's not what the proposed policy does. Instead, the policy carves out a subsidy tier ONLY for nuclear power with guaranteed cost-recovery. If the Governor is determined to throw the nuclear industry a bone, reactors should at the very least have to go toe-to-toe with other forms of energy. Otherwise, the policy isn't fair. The renewable resources supported by the Clean Energy Standard will have to compete with each other, so why insulate the nuclear industry from competition? To create competition in the Nuclear Tier of the Clean Energy Standard, the Commission should allow utilities to first fulfill their Renewable Energy buying obligations. Then utilities should have the choice whether to buy additional zero-carbon credits from nuclear power, other renewables, or energy efficiency. This type of competition and choice will ensure that there is a Plan B if the nuclear plants close unexpectedly. It will also ensure that consumers are getting their carbon-reductions from the cheapest resources.

How to submit comments

Public hearings are scheduled throughout May. Visit www.CleanUptheCleanEnergyStandard.org for dates. We encourage you to attend the hearing in your area.

Visit the Alliance for a Green Economy comment form to submit a pre-written comment or to write your own. www.allianceforagreenconomy.org/nukes-are-not-clean

Public comments are due June 6, 2016.

For more information

To see the entire docket in the Clean Energy Standard case, visit:

<http://documents.dps.ny.gov/public/MatterManagement/CaseMaster.aspx?MatterCaseNo=15-e-0302>

To view the Clean Energy Standard proposal, visit:

<http://documents.dps.ny.gov/public/Common/ViewDoc.aspx?DocRefId={930CE8E2-F2D8-404C-9E36-71A72123A89D}>

To see detailed technical comments submitted by Alliance for a Green Economy and Nuclear Information and Resource Service, visit www.allianceforagreenconomy.org/ces.

For more on the Energy Affordability for Low-Income Customers Proceeding, see:

<http://energydemocracyny.org/energy-affordability-for-low-income-utility-customers>

Contact Jessica Azulay at Alliance for a Green Economy (AGREE), jessica@agreenewyork.org with additional questions about the policy or the process.