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December 1, 2008 Mr. David Coup New York State Energy Research and Development Authority 17 Columbia Circle Albany, New York 12203 RE: Comments on NYSERDA's Operating Plan for Investments in New York under the CO2 Budget Trading Program and the CO2 Allowance Auction Program Concept Paper Dear Mr. Coup, Brookfield Renewable Power would like to thank you for the opportunity to comment on NYSERDA's Concept Paper on developing an Operating Plan for Investments in New York under the CO2 Budget Trading Program and the CO2 Allowance Auction Program. Specifically, Brookfield would like to comment on 2 initiatives described in the Concept Paper: Electric Power Supply and Delivery, and Sustainable Bioenergy. The first of these initiatives, focused on Electric Power Supply and Delivery, is to reduce the carbon foot print of the electric power sector in New York. Specifically, NYSERDA is looking for cost-effective initiatives that reduce green-house gas emissions while simultaneously optimizing system reliability, safety, and security. NYSERDA recognizes that green technologies will be needed to "dampen the intermittent power characteristics of renewable resource generation" to "ensure that a secure, reliable electric grid can be maintained as the electric power sector adapts to a carbon-constrained environment". Brookfield suggests NYSERDA focus this initiative on green technologies that can be dispatched by the NYISO and help to level 'renewable gaps' that occur when intermittent generation falls off. Many of this 'dispatchable green' potential comes from existing fossil fired facilities having the ability to convert to bio-fuels, but lacking the fuel supply to do so. Supporting dispatchable green technologies provides NYSERDA with the ability to promote sustainable bio-energy while also addressing the need to provide reliability to the grid and at the same time motivate peak facilities to refuel with cleaner, sustainable biofuels. Promotion of dispatchable green resources, such as retro-fitted bio-fueled combustion turbines, would not only help achieve RGGI carbon reduction objectives, but would also help the State achieve it's RPS goals, all while providing much needed security to the electric grid. The NYSEDA Concept Paper also details an objective to develop a Sustainable Bioenergy industry through the use of advanced biofuels. Again, this illustrates a clear symbiosis between the RPS and NYSERDA RGGI initiatives that can be fulfilled by dispatchable bio-fuel technologies. Unfortunately, because of its 'chicken and egg' nature, a sustainable bioenergy industry will not likely happen without assistance from the State. Currently, bio-fuels are cost-prohibitive because the supply is limited. Likewise, supply is limited because there is little demand. Brookfield recommends State assistance to help get the industry up and running. Thank you for consideration of these additional comments. Kind regards, Bob Robert Ricketts Director - Regulatory Affairs Brookfield Renewable Power Inc. ph: 518 724-3720