

Audrey Zibelman
Chair
New York State Public Service Commission
Empire State Plaza
Agency Building 3
Albany, NY 12223-1350

October 24, 2014

Re: Opportunities for Public Participation in the Reforming the Energy Vision and Clean Energy Fund Proceedings

Dear Ms. Zibelman:

We, the 57 undersigned organizations and elected officials, request the Public Service Commission's consideration of several suggestions to improving the process underway for advancing the Reforming Energy Vision (REV) initiative. We hope our recommendations will be taken in the spirit that they are intended, as constructive proposals to drive outcomes that most broadly reflect the aspirations of New York's diverse communities and stakeholders to realize a new energy future.

First, we would like to acknowledge the tremendous opportunity presented by the REV proceeding. REV represents a major shift in the way New York approaches energy policy. The transformation of our current energy system to one that accelerates the deployment and penetration of energy efficiency measures as well as renewable and distributed energy is certainly welcomed by signatories to this letter. Perhaps no other action by the Commission has such potentially sweeping and "game changing" impact.

When taken together with its companion proceeding, the Clean Energy Fund, meeting these challenges to secure the state's climate, economic and energy future is a critical imperative that can be called nothing short of enormous.

Energy insecurity, affordability, reliability, resilience, and resource efficiency are but a few of the drivers of the REV proceeding. If REV is conducted with New York's residents at the center of attention, we can better curb the climate crisis, prevent health and safety threats posed by slipshod and dirty energy development in our communities, and achieve electricity affordability for all New Yorkers to live comfortably and work productively.

However, the magnitude of the opportunities presented by these proceedings is only matched by the complexity of interrelated challenges facing New York's energy stakeholders in realizing such an ambitious vision.

In its current form, the process for the Reforming the Energy Vision Proceeding does not lend itself to the broad public participation necessary to arrive at outcomes that reflect the will of all New Yorkers. Most people in New York – even those working on the front lines for a sustainable energy transition – have no idea the proceeding is happening. The documents have been written in a format that is too technical for the average reader and publicity has been minimal. Public hearings have not been scheduled or held; instead the in-person input format is a technical conference that is inaccessible and daunting for most community residents. Comment deadlines are woefully short given the gravity of the changes being proposed and the complexity and length of the documents put forth for review.

The major proposals at the heart of these proceedings should be subject to a much more open and comprehensive public input process. The Reforming the Energy Vision staff straw proposal released in September proposes unprecedented new roles and responsibilities for the investor-owned utilities, businesses that have little accountability to the public and that have historically stood in the way of progress toward the state's environmental and affordability goals. The proposed transfer of power over the design and implementation of the state's energy efficiency and renewable energy programs from NYSERDA, a public agency, to the utility companies should not be fast-tracked. This warrants major discussion and input from all sectors of New York's society, as well as the serious development and consideration of alternative proposals.

Given the potential impact of these proceedings on our lives and our aspirations for a more sustainable and equitable energy system, we make the following requests and recommendations:

- The Commission should engage in an aggressive mass media and publicity campaign about these proceedings to explain to the public what is at stake and encourage public input.
- At the least, plain-language summaries should accompany all proposals and orders. Preferably, proposals and orders themselves should be written in plain, simplified language, with a minimal use of technical terms and acronyms.
- A simplified and clear one-form online process for becoming a Party to these proceedings should be implemented. It is currently confusing to navigate the DPS website and find all the necessary steps to joining as a Party.
- The Commission should proactively seek input from communities and constituencies that are underrepresented in the Party list of these proceedings.
- Free, accessible, open and well publicized information sessions should be held across the state to explain the major elements of the proposals and answer questions.
- Public hearings should be held across the state at accessible locations and accessible times, and should prioritize communities that are on the frontlines of climate change and environmental injustice.
- The REV proceeding itself should be slowed down and conducted over a longer time period, with comment deadlines on major proposals extended to at least 90 days. Input opportunities on fundamental issues should remain open until details are developed and potential impacts clarified.
- A full schedule for the various Tracks, staff proposals, Commission orders, comment deadlines, and public input opportunities for the REV proceeding should be published and continuously updated in a prominent place on the Public Service Commission website.
- Interrelated proceedings, including REV and Clean Energy Fund should be better integrated with regards to comment deadlines so that parties have enough time to reasonably participate in each and understand each in the context of the other.
- Intervener funds for research and the development of alternative proposals should be made available to Parties to the proceedings.

We would welcome the opportunity to discuss these suggestions further with the Public Service Commission and Department of Public Service staff as soon as possible. We look forward to working with you to open these proceedings to more New Yorkers. Please contact Jessica Azulay at Alliance for a Green Economy, (315) 480-1515, jessica@allianceforagreenecology.org, to follow up.

Thank you for your consideration.

Sincerely,

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