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THE SENATE  
STATE OF NEW YORK



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July 20, 2016

Hon. Kathleen H. Burgess  
Secretary to the Commission  
New York State Public Service Commission  
Three Empire State Plaza  
Albany, New York 12223-1350

Dear Secretary Burgess:

I request that the NY State Public Service Commission reconsider the recommendations for a mandatory nuclear subsidy that is estimated to cost New Yorkers more than \$7 billion over the course of the next 12 years.

In a recent California Public Utility proposal, the State will phase out their last nuclear power plant through a joint agreement between Pacific Gas & Electric, Plant workers unions, environmental groups and municipal officials to replace the last nuclear plant facility with renewable energy resources of the next 9 years. This agreement made sure to protect the jobs of countless workers by providing them with updated training without mandating any subsidy that taxpayers would fund.

Unlike California, New York State has no plan in place that would not hurt taxpayers. The Department of Public Service is proposing to impose an estimated \$7.6 billion subsidy to underwrite the currently unprofitable operation of FitzPatrick, Ginna, and Nine Mile Point nuclear power stations. Over the next two years, New York taxpayers will be forced to subsidize an estimated \$953 million dollars to keep these plants operational. By subsidizing these plants, New York ratepayers see rates escalate from \$17.48 to \$29.15 over the next twelve years.

In addition to the three previously mentioned nuclear power stations, the proposed recommendations also include the Indian Point nuclear power station. The New York State Department of State has already deemed this power station to be unnecessary and unreliable. Adding this power station to the proposal burdens New York taxpayers with another \$4 billion in subsidies in a region with the highest tax rates in the country.

Moreover, the Load Serving Entities – the utilities and Energy Service Companies (ESCOs) – would be required to bill their customers for the so-called Zero Emission Credits (ZECs). New Yorkers would no longer have the option of choosing to purchase 100% renewable energy because they would be forced to pay the nuclear surcharge regardless of whether or not they want to purchase nuclear power.

1. The first part of the document discusses the importance of maintaining accurate records of all transactions. This is essential for ensuring the integrity of the financial statements and for providing a clear audit trail.

2. The second part of the document outlines the various methods used to collect and analyze data. These methods include direct observation, interviews, and the use of specialized software tools.

3. The third part of the document describes the results of the data collection and analysis. It shows that there are significant differences between the reported and actual values in several key areas.

4. The fourth part of the document discusses the implications of these findings and provides recommendations for improving the accuracy of the financial reporting process.

5. The fifth part of the document provides a detailed breakdown of the data collected, including a comparison of the reported and actual values for each category.

6. The sixth part of the document discusses the potential causes of the discrepancies identified in the data. These causes include errors in data entry, misclassification of transactions, and incomplete reporting.

7. The seventh part of the document provides a summary of the findings and conclusions of the study. It emphasizes the need for improved controls and procedures to prevent such discrepancies in the future.

8. The eighth part of the document provides a list of references and sources used in the study.

9. The ninth part of the document provides a list of appendices and additional information related to the study.

10. The tenth part of the document provides a list of figures and tables used in the study.

11. The eleventh part of the document provides a list of abbreviations and acronyms used in the study.

12. The twelfth part of the document provides a list of contact information for the authors and the research team.

13. The thirteenth part of the document provides a list of acknowledgments and thanks to the individuals and organizations that supported the study.

14. The fourteenth part of the document provides a list of the authors' contact information and a statement of their qualifications.

15. The fifteenth part of the document provides a list of the authors' disclosures of potential conflicts of interest.

16. The sixteenth part of the document provides a list of the authors' disclosures of funding sources.

17. The seventeenth part of the document provides a list of the authors' disclosures of any other relevant information.

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Furthermore, by referring to nuclear power as having zero-emission attributes, the proposal ignores emissions generated in mining, milling, transporting and storing nuclear fuel, and the planned and unplanned releases of radioactive isotopes and other emissions associated with nuclear operations. The proposal also ignores the creation of high-level radioactive waste in the form spent nuclear fuel rods, which will likely be stored in New York State for many decades. It also exaggerates the reliability of aging nuclear facilities, which have recently experienced increasingly frequent outages due to leaks, fires, and electrical problems.

I urge the Public Service Commission to deny the Staff's Responsive Proposal for Preserving Zero-Emissions Attributes in its current form. The recommendations mentioned above will have significant negative economic impacts on Rockland and Westchester Counties. I also request that the PSC extend the deadline for filing comments on the proposal to the full 45-days, as is customary under State Administrative Procedures Act (SAPA), to allow adequate time to review the substantial changes contained in this proposal.

Sincerely,

A handwritten signature in black ink, appearing to read "D. Carlucci", written over a horizontal line.

Senator David Carlucci  
38th Senate District

