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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 interviews, surveys, and focus groups, each of which has its own strengths and limitations.

3. The third part of the document describes the process of data analysis, from the initial cleaning and organization of the data to the final interpretation of the results. This process is often iterative and requires a high level of attention to detail.

4. The fourth part of the document discusses the challenges of conducting research in a complex and rapidly changing environment. These challenges include limited resources, time constraints, and the need for flexibility in the research design.

5. The fifth part of the document outlines the ethical considerations that must be taken into account when conducting research. These considerations include the need for informed consent, the protection of confidentiality, and the avoidance of harm to participants.

6. The sixth part of the document describes the process of reporting the results of the research. This process involves the preparation of a clear and concise report that effectively communicates the findings to the intended audience.

7. The seventh part of the document discusses the importance of ongoing communication and collaboration throughout the research process. This is essential for ensuring that the research is relevant and that the findings are effectively implemented.

8. The eighth part of the document outlines the various ways in which research can be used to inform decision-making. This includes the use of research to identify opportunities, assess risks, and evaluate the effectiveness of different strategies.

9. The ninth part of the document describes the process of evaluating the impact of the research. This involves the use of a variety of methods to assess the extent to which the research has influenced practice and policy.

10. The tenth part of the document discusses the future of research and the need for continued innovation and improvement in research methods and practices. This is essential for ensuring that research remains a valuable and effective tool for understanding the world.

11. The eleventh part of the document outlines the various ways in which research can be used to inform policy-making. This includes the use of research to identify policy options, assess the potential impacts of different policies, and evaluate the effectiveness of existing policies.

12. The twelfth part of the document describes the process of evaluating the impact of policy-making. This involves the use of a variety of methods to assess the extent to which policy-making has influenced practice and outcomes.

13. The thirteenth part of the document discusses the importance of transparency and accountability in research. This is essential for ensuring that the research is conducted in a fair and unbiased manner and that the findings are accurately reported.

14. The fourteenth part of the document outlines the various ways in which research can be used to inform practice. This includes the use of research to identify best practices, assess the effectiveness of different interventions, and evaluate the impact of practice changes.

15. The fifteenth part of the document describes the process of evaluating the impact of practice. This involves the use of a variety of methods to assess the extent to which practice changes have influenced outcomes.

16. The sixteenth part of the document discusses the importance of ongoing evaluation and improvement in research. This is essential for ensuring that research remains a valuable and effective tool for understanding the world.

17. The seventeenth part of the document outlines the various ways in which research can be used to inform research. This includes the use of research to identify research needs, assess the potential impacts of different research designs, and evaluate the effectiveness of existing research.

18. The eighteenth part of the document describes the process of evaluating the impact of research. This involves the use of a variety of methods to assess the extent to which research has influenced practice and policy.

19. The nineteenth part of the document discusses the importance of ongoing communication and collaboration in research. This is essential for ensuring that the research is relevant and that the findings are effectively implemented.

20. The twentieth part of the document outlines the various ways in which research can be used to inform research. This includes the use of research to identify research needs, assess the potential impacts of different research designs, and evaluate the effectiveness of existing research.

21. The twenty-first part of the document describes the process of evaluating the impact of research. This involves the use of a variety of methods to assess the extent to which research has influenced practice and policy.

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 in a cursive style.

Senator David Carlucci
38th Senate District

