

ACE NY appreciates the effort being made through Integrating Public Power Task Force (IPPTF) to examine the possibility of adopting a policy of carbon pricing for New York's energy market. ACE NY respectfully submits the following comments on the draft work plan.

(1) A suggestion was made at the January 8 IPPTF meeting to combine tracks 3 and 5. ACE NY supports the combining of these two tracks. Doing so makes sense from the perspective of coordinating the work effort. It will also make it easier for small intervenors to participate in the process.

(2) ACE NY supports the recommendations of several parties that a substantial effort be made to model the effect of carbon pricing for the years 2020 to 2030 using production simulation or market simulation models such as GE MAPS. The modeling, to date, has been excessively simplified. For such an important change as carbon pricing, it is important for the decision makers to have a reasonably good picture of the possible future New York electric system and market to which carbon pricing would be applied. The IPPTF should adopt a process to: (1) receive suggestions for scenarios (i.e., sets of assumptions about the future system such as new transmission, MW of off-shore wind, etc.) from the parties and; (2) decide on a subset of the suggested scenarios to run.

Thank you,

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