

Roger Caiazza Personal Questions on the
Proposal to Incorporate Carbon Pricing into the Wholesale Energy Markets
IPPTF Meeting September 17, 2-18

Via email to NYISO at IPP_feedback@nyiso.com

Introduction

I have been motivated to submit to follow this process and submit comments so that there is at least one voice of the unaffiliated public whose primary interest is an evidence-based balance between environmental goals and costs to ratepayers. In the past my submitted questions and comments have been pretty much ignored but I have questions for the Integrating Public Policy Task Force Meeting on September 17 that could easily be addressed by presenters that I think are germane to all stakeholders.

My first question is general. Will the NYISO provide stakeholders with a report that provides more detail than is possible than in a presentation and include detailed quantitative results for review and comment?

I have some specific questions on the Analysis of a New York Carbon Charge Brattle Group presentation.

In slide 10: Customer Credits from Emitting Resources, the customer credit reflects total emissions. Total CO2 emissions in 2020 are 29 million tons and 25 million tons in 2025. CO2 emissions in 2017 were 25 million tons. Any ideas why the CO2 emissions came down so early and how would that affect your results?

In slide 10: "Amounts trend similarly to LBMPs, offsetting ~60% of the wholesale price effect". Is the offset total emissions times the carbon charge? The follow on question is to confirm that you have assumed that the entire amount returns to the customers.

In slide 18 the table includes new renewable resources in 2020 based on CARIS. For those of us not familiar with CARIS numbers it would be useful to list just how much capacity and generation is expected from those new resources. More importantly, 2020 is only two years away. How does the CARIS assumption look relative to projects in the Article Ten application queue? As of this week there are only 235 MW of wind capacity that have Article Ten applications deemed complete.

In slide 26 there is a table of key metrics that includes upstate and downstate wind/solar generation (TWh). Do these values include behind the meter solar?

Thank you.

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