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## **NYISO Files Comments on EPA Clean Power Plan**

Rensselaer, N.Y.—Stressing concerns about the potential implications for electric system reliability and the lack of recognition of the progress the state has already made in achieving significant reductions in CO<sub>2</sub> emissions, the New York Independent System Operator (NYISO) filed comments with the Environmental Protection Agency (EPA) on the proposed Clean Power Plan.

“As proposed, the Clean Power Plan presents potentially serious reliability implications for New York,” the NYISO stated. “A majority of the electric capacity within New York City is dual-fuel oil/gas steam-fired electric generating units. These units are critically important, both due to their location within the transmission constrained New York City area and because they possess dual-fuel capability that provides a needed measure of protection against disruptions in the natural gas supply system.”

In its comments, the NYISO questioned the EPA’s assumption that the output from these important dual-fuel units could be reduced by over 99 percent while maintaining reliable electric service to New York City.

“Such a reduction cannot be sustained while maintaining reliable electric service to New York City,” said the NYISO. “Congress recognized in the Energy Policy Act of 2005 that the population density of the New York City area, the percentage of the population that lives or works in very tall buildings and relies upon underground transportation, and the critical importance of institutions located there intensify the need to maintain the reliability of New York’s electric system. The EPA should do the same. “

The NYISO also took issue with the emission-reduction targets and timelines established in the proposed plan for New York.

“The flaws with the Clean Power Plan that would compromise reliability in New York stem from key assumptions within the Building Blocks that are not technically sound and result in CO<sub>2</sub> emissions reduction targets for New York that are unreasonable and unworkable within the timeframes provided. The assumptions upon which the Building Blocks are based must be technically and economically sound for the CO<sub>2</sub> emissions-reductions targets derived from them to be reasonable and consistent with the requirements of a reliable electric system. No amount of flexibility afforded in the manner in which New York State may seek to comply with the Clean Power Plan can make up for requirements that are inherently unreasonable because they are based on flawed assumptions in the Building Blocks.”

New York’s successful track record of reducing power plant emissions and its future commitments under the Regional Greenhouse Gas Initiative (RGGI) should also be recognized by the EPA said the NYISO.

“New York has already reduced CO<sub>2</sub> emissions from its power sector by 41.6 percent below 2005 levels and generates approximately 53 percent of the electricity it uses on an annual basis from non-emitting resources. The state’s generation fleet is the ninth cleanest in the country, and New York’s commitment to the Regional Greenhouse Gas Initiative calls for even further CO<sub>2</sub> reductions between now and 2020. New

The New York Independent System Operator (NYISO) is a not-for-profit corporation responsible for operating the state’s bulk electricity grid, administering New York’s competitive wholesale electricity markets, conducting comprehensive long-term planning for the state’s electric power system, and advancing the technological infrastructure of the electric system serving the Empire State.

Yorkers currently pay the highest electric rates in the contiguous United States, including fees that are used to fund investments in clean energy and conservation that have contributed to New York's already low-carbon emissions profile. The targets developed for New York under the Clean Power Plan for further CO<sub>2</sub> emissions reductions should recognize and appropriately reflect the significant efforts that have already been made in New York and the progress that has been achieved."

The NYISO proposed several specific revisions to the plan and encouraged the EPA to revisit the Building Blocks and the targets set for New York.

NYISO's filed comments are available [here](#).

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