To Whom It May Concern:

I urge you to make two modifications to the proposed plan, particularly under Executive Summary pp. 2 – 4 Residential, Commercial and Industrial, and Power Supply and Delivery, and Section 5, Electric Power Supply and Delivery. I suggest you include the opportunity for

1. Land based, small scale wind energy. New wind technology has been developed that is appropriate for an urban environment in that it is not propeller style wind turbines and it fits within the urban fabric, either on roofs or between buildings. It would be a shame to miss the opportunity to develop this alternative energy source for the city.

2. A program to support the installation of renewable energy technology at the community level

   a. Although the government has in place a tax credits to help homeowners incorporate solar or wind energy and green roofs, even the wealthiest homeowners find the upfront costs of the renewable energy too high and the benefits too long term. The costs of renewable energy for individual homeowners will only become affordable when a critical mass of homes in a specific community is being retrofit with location-appropriate renewable energy technologies, allowing for economies of scale.

      ▪ First as a pilot program, the funding should support feasibility studies, start up costs and initial infrastructure purchases. The program could start as a vehicle to provide improvements, jobs and renewable energy to neighborhoods that were hard-hit by the mortgage crisis. Where ever the pilot is located, it would result in a model for renewable energy at the local level for the rest of the city and the country.

      ▪ Community-based renewable energy would have the benefit of local job training for local jobs and local implementation. It would be easier to do the permitting for the community or neighborhood all at once, rather than on a one by one basis, and also easier than finding the location for the large scale solar or wind farm and then figuring out how to get the power into the grid and to the neighborhood. It would empower neighborhoods to address their energy needs, both their demand and their supply.

   b. A community level program for commercial and industrial uses similar to (a) above.
If you would like additional information regarding either suggestion, please contact me.

Thank you for the opportunity to comment.

Caroline G. Harris

Caroline G. Harris

Law Offices of Howard Goldman LLC

475 Park Avenue South, 28th floor

New York, NY 10016

T: 212 935 1622

F: 212 935 2651

charris@hogolaw.com