



New York
Biomass Energy
Alliance

March 23, 2009

To: NYSERDA, RIGGI Program Staff

Subject: Comments on Draft Operating Plan

The New York Biomass Energy Alliance is recently-formed coalition of individuals, businesses, and organizations that seeks to enhance public support and understanding of the benefits of using sustainably produced and harvested biomass as a source of renewable energy in the state and the region.

We appreciate the opportunity to comment on the draft plan, and commend NYSERDA staff for the thought and expertise invested in developing this strategy for utilizing funds from CO₂ auction proceeds to address a wide range of indentified greenhouse gas reduction needs.

The inclusion of biopower in the Advanced Power Technology Program is a much appreciated recognition of the role that available woody and herbaceous feedstocks can already play, with existing technology, in reducing the use of fossil fuels in power generation in New York State. In listing the renewable energy technologies that can serve this purpose (first paragraph under section 5.B.1.), the citation refers to "advanced biomass". This choice of language could be confusing, or suggest that the goal is only to utilize biomass of types not already available for conversion into electricity. Clearly wood chips harvested in a responsible manner for New York's forests will provide a starting point for the biopower industry in our state, with new feedstocks like cropped shrub willow and perennial grasses, of both established and novel varieties, becoming available as they find their place in the state's agricultural economy. Therefore, we suggest that the reference at that point be simply to "biomass", rather than "advanced biomass".

In Section 6, covering Sustainable Agriculture and Bioenergy, the first paragraph ends with a sentence stating that this program will focus on biofuels and bioheat. We would suggest changing that line to state, "...biofuels, *bioproducts*, bioheat, *and CHP*." Biorefineries, which can produce both fuel or fuel precursors and industrial chemicals, are another area for potential industry development in New York. Since a number of mid-sized and larger industrial energy users in New York are already investing in, or at least investigating, replacing fossil fuels with biomass to produce process heat and electricity, this appears to be a particularly fertile area for both technology and feedstock supply system development. It would be unfortunate to exclude projects that were focused on the use of biomass in such CHP applications.

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The last point we would like to make has to do with timing for one of the activities listed for this program: Develop Performance Standards. This activity does not appear on activities is listed in the chart on page 45 that summarizes the anticipated multi-year program schedule. Our observation is that the development of performance standards, particularly with respect to CO₂ reduction, is work that will be of significant importance as the country moves in the direction of a national carbon management regime, and it may be work that NYSERDA should be prepared to fund in the first year of the program.

Thank you again for the opportunity to comment on the draft plan.

Sincerely,

/s/

Dan Conable, Director