



July 1 2022

Draft Scoping Plan Comments
NYSERDA
17 Columbia Circle
Albany, NY 12203-6399

Distributed Sun LLC (“DSUN”)
Letter in Support of Geothermal, and the comments of Bedrock Energy and Cornell on the Draft Scoping Plan

My firm is an active developer who has completed ten percent of the operating CDG in NY, tens of MW of commercial and industrial solar upstate and in NYC, and of other renewable energy projects in New York and nationwide. DSUN supports the development of medium and deep geothermal projects as renewable energy resources fundamental to helping New York achieve its goals. We believe that appropriately deployed geothermal resources can be a substantial renewable generation asset class which will lower green house gases and broaden and enhance resilience to the distributed grid. DSUN supports the comments of Bedrock Energy especially with regards to geothermal drill depths but also with regards to financial considerations. DSUN supports each of Cornell University’s comments.

We recommend adoption of regionally appropriate drill depth thresholds up to 3,000 feet or more for exempting safe, geothermal boreholes from drill permit requirement. DSUN notes that NY Environmental Conservation Law 23 states in Chapter 43-B, § 23-0301, Declaration of Policy, that operation and development of geothermal wells should be regulated in a similar fashion as oil and gas properties. The suggestions made by Bedrock, for example, emphasize that geothermal wells are dissimilar to oil and gas properties and thus consistent with NY policy.

We also suggest that the State create appropriate public financial incentives, tax incentives and low-cost finance offerings will encourage private investment in geothermal projects in New York. Such investment is consistent with NY SUN, and will accelerate development of these projects better enabling NY to accomplish the goals set by the Climate Action Council Draft Scoping Plan.

Cornell’s comments emphasize the many areas in which geothermal wells are dissimilar to oil and gas properties. Adoption of their recommendations will encourage private investment which will accelerate geothermal projects as well.

DSUN applauds the work of NYSERDA on the scoping plan and supports its implementation.

Regards,

A handwritten signature in black ink, appearing to read "Jeff Weiss".

Jeff Weiss
Executive Chairman