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Check all topics to which your comments apply	Chapter 13. Electricity
Comment (2000 characters maximum)	<p>In what appears to be a egregious attempt to reduce the published costs of wind, solar, and battery storage the Integration Analysis assumes that the expected lifetimes of those technologies is indefinite. As a result, units are assumed to remain online throughout the study period and no costs for replacements between now and 2050 are included. However, that is a poor assumption because it is totally unreasonable to expect that, for example, the existing land-based resources will still be in operation in 2050.</p> <p>Using an indefinite retirement date for wind, solar and battery storage resources underestimate the total builds needed for 2050. For land-based wind between 3,814 MW and 4,600 MW are not included and for offshore wind between 6,200 and 6,600 MW are not included. The amount of solar not included ranges between 22,639 MW and 19,983 MW. Finally, for battery storage between 10,713 MW and 12,207 MW of additional resources will be need to be developed to meet the 2050 projected value.</p> <p>Another way to look at the exclusion of these resources is that land-based wind development costs could be up to 45% higher than the projections that don't include reasonable retirement dates simply because that much more needs to be developed. Off-shore wind costs could be up to 38% higher, solar costs could be up to 35% higher, and battery storage could be up to 64% higher than projections that exclude reasonable retirement dates.</p> <p>I conclude that there are questions that the Climate Action Council needs to address. Why shouldn't reasonable retirement dates be included in the Final Scoping Plan. What would the revised costs be if retirements were included?</p>