



NIAGARA COUNTY LEGISLATURE
NIAGARA COUNTY COURTHOUSE
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August 28, 2020

Hon. Michelle L. Phillips
Secretary to the Commission
New York State Public Service Commission
Empire State Plaza
Agency Building 3
Albany, NY 12223-1350

Re: Matter 15-01168

Dear Secretary Phillips:

We are members of the Niagara County Legislature, representing communities along the Niagara River and Lake Ontario. We write today to express our opposition to the Great Lakes Wind Feasibility Study as outlined in your "White Paper on Clean Energy Standard Procurements to Implement New York's Climate Leadership and Community Protection Act."

We could list many reasons why further stressing Lake Ontario with wind projects is a very bad idea that would negatively impact our tourism, fishing and recreational industries. As a matter of fact, the Niagara County Legislature has gone on record as opposing any wind projects on Lake Ontario for these reasons. But we also recognize these considerations, among many, many others, would obviously be part of the feasibility study.

Instead, our opposition at this point rests on the proverbial notion of "putting the cart before the horse." In that regard, we reference your own white paper:

Moreover, given that such projects would interconnect in the region of the State with the greatest proportion of renewable energy development relative to native load, NYSERDA and Staff do not propose at this time to establish a separate tier to support Great Lakes wind over land-based or oceanic offshore wind projects. However, given the ambitious targets of the CLCPA, NYSERDA and Staff believe that a feasibility study to explore and confirm the potential long-term benefits of this resource is warranted.

Clearly, you acknowledge our region is generating significant renewable energy relative to the amount of energy we are using, which is not surprising. Everyone is aware that the

challenge in meeting state renewable energy goals is getting green energy to the greater New York City region. Hence, power generated by any Great Lakes wind project would need to be transmitted downstate.

But as you know, the transmission capacity does not exist to get that power downstate. So, the question becomes, why are you going to go through a contentious study that will create tremendous consternation in lakeshore communities that already feel the state is taking away their local decision-making authority on power generation projects, when you have not come close to solving the transmission issue? Shouldn't the focus of your time and resources be to first figure out that issue, which to our understanding has been a conundrum for policymakers for decades, given the bottleneck that begins in the Utica area?

We know there are passionate people on both sides of the idea of Great Lakes wind projects. Make no mistake; we are firmly opposed to it as we believe it will be very harmful to lakeshore communities. But stoking those passions with a feasibility study when the transmission issue has not been solved, seems wholly unnecessary.

Thank you for your consideration.

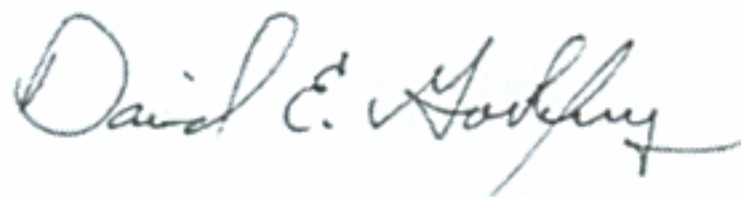
Sincerely,



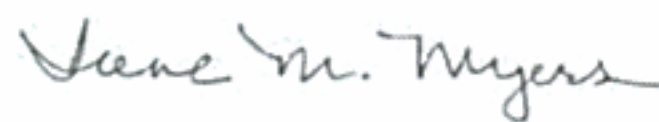
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