August 2, 2019

The Honorable Andrew M. Cuomo
Governor of New York State
New York State Capitol Building
Albany, NY 12224

Re: S. 23/A.4294 - In Relation to Maintaining the Continued Viability of the State’s Existing Large-Scale, Renewable Energy Resources

Dear Governor Cuomo:

I write on behalf of the Sabin Center for Climate Change Law to express my support for S.23/A.4294, the intent of which is to provide existing large-scale, renewable energy resources in New York state with the financial incentives needed for them to continue operations in the state for the foreseeable future. This bill would allow New York to maintain its existing baseline of renewable electricity generation, encourage us to sell our renewable energy credits within the state (as opposed to other states), and help us achieve our ambitious renewable energy goals at the lowest cost to ratepayers. For these reasons, the Sabin Center supports this bill and encourages your signature.

As you well know, New York now has a mandate to supply 70% of the state’s electricity from renewable sources by 2030 pursuant to the Climate Leadership and Community Protection Act. Achieving these goals will require use of the full range of renewable technologies, and will most certainly involve retaining existing projects that already provide renewable energy to our state. Adequate pricing signals will help ensure that these existing projects remain in operation.

In addition, this bill would help New York achieve its 70% by 2030 mandate by retaining existing clean attributes in-state and continuing to provide power to New Yorkers. Currently, New York does not allow generators to participate in state procurements, but renewable portfolio standard programs in neighboring states do. This bill intends to remedy that situation by incentivizing the sale of existing clean energy to in-state customers.

Finally, there are substantial cost savings to be realized in retaining our existing renewable generation as compared to building additional new facilities.
For the above reasons, the Sabin Center for Climate Change Law urges your signature on this important piece of legislation.

Sincerely,

Michael B. Gerrard  
Andrew Sabin Professor of Professional Practice  
Director, Sabin Center for Climate Change Law