

total greenhouse gas emissions. Accordingly, the NYISO is counting on a peak load reduction of 8,229 MW and 47,768 GWH from EE and Codes and Standards, by 2040 in its load forecast.

Accomplishment of a such massive level of EE would require significant ramp up of current and new EE programs and the use of all tools in the toolbox. While New York utilities and NYSERDA have spearheaded the EE efforts in the State for decades, it is unclear if their efforts would suffice to accomplish the very aggressive EE goals. The NYISO market mechanisms would be another tool to deploy to attract more EE providers to NY market to facilitate accomplishment of EE goals in the CLCPA. We recognize that neighboring RTOs PJM and ISONE already allow EE to participate in the supply side of their markets and they have worked through numerous issues to facilitate EE participation. The NYISO through its stakeholder process should also explore an EE participation model to allow EE providers to offer EE on the supply side. ACE NY stands ready to assist in the stakeholder collaboration process.

We respectfully urge the FERC to support the ‘protest filing’ made by the Clean Energy and Consumer Advocates and order the NYISO to develop a ‘participation model’ for EE resources to allow them to participate in the NYISO wholesale capacity markets.

Sincerely,

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Executive Director
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