



TOWN OF NEW CASTLE

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Via Email: Secretary@dps.ny.gov

Hon. Kathleen H. Burgess, Secretary
Public Service Commission
Three Empire State Plaza
Albany, NY 1223-1350

Re: Matter 17-G-0606

Dear Secretary Burgess:

The Town of New Castle is proud of our designation as a New York State Energy Research and Development Authority (NYSERDA) Clean Energy Community. As such, we support the efforts of the Public Service Commission and Con Edison to meet the State's climate change goals by encouraging the use of alternative, environmentally-friendly energy sources. While we look forward to working with the PSC and Con Ed to achieve these goals, with regard to the Con Ed moratorium on natural gas connections, we offer the following feedback and recommendations:

1. We request an extension of the deadline from March 15th to August 1st.

Westchester County Executive George Latimer has called on Con Ed to "push back" the start date for the moratorium to August 1st, one month after the PSC report is anticipated. The extension would provide additional time for local municipalities and the county to plan for this change. Additional time will help us to provide appropriate notification to residents, developers, building owners, tenants, architects, engineers, and planning professionals, which will ensure a more seamless transition. The extension will allow us the opportunity to identify all projects in our municipality that are in the pipeline, so to speak. Lastly, the additional time will help our municipality to review our application, permitting, and approval processes and to make changes as needed. While we have begun these activities, the moratorium is a significant change and we want to make sure our constituents are prepared.

2. We further request consideration of the scope of the moratorium.

Specifically, the Town is concerned about the impact that the moratorium will have on new development in our downtown areas. We are concerned about the potential loss of revenue for merchants and property owners, and the downstream impacts on economic development, jobs, and property values. For example, bringing a new restaurant into our town will be nearly impossible under the moratorium. One idea for your consideration is to amend the moratorium to limit it to residential developments, since individual residences can deal with the issue slightly easier by utilizing alternate energy sources such as solar or propane on a much smaller scale.

3. We request transparency into the decision making process.

Once Con Ed has collected all applications for natural gas connections, how will decisions be made about which projects are approved? Are there criteria in place for project prioritization? What is the role of the PSC in the approval process? Will the County and local governments be invited to participate in the approval process? A deeper understanding of the decision-making process will help us to provide guidance to our constituents.

4. We ask for your leadership in identifying and bringing to market viable alternative clean energy sources.

While we applaud the investments in “Smart Solutions,” we have concerns that the alternatives will not accomplish the goal of reducing reliance on fossil fuels. We support promoting alternative clean energy sources over increases in natural gas supply; therefore, we will vigorously oppose any effort to site a natural gas storage tank in our town and/or in other communities. Furthermore, our constituents have raised legitimate safety concerns with both the storage tanks and the proposal for organic waste conversion (due to methane gas). These ideas conflict with our 2017 Comprehensive Plan, and on whole we question whether they are good for Westchester County. Additionally, we question whether the “Smart Solutions” will meet the demand of customers. Without sufficient investment in clean energy alternatives to natural gas, we fear that demand for fuel oil will increase. We are also concerned about potential increases in demand for electricity, which will put strain on the grid and accelerate the increased increase reliance on the aging infrastructure used to supply electricity to the region.

5. We suggest developing incentive programs to encourage clean energy.

As previously mentioned, New Castle is a NYSERDA Clean Energy Community, and we are committed to continuing to lead the way in adopting clean energy standards. We are proud of local projects, such as the Fuller Center homes, where “passive house” standards have been used for ultra-energy efficiency. We are exploring green energy building standards. We encourage NYS to create incentive programs for communities that are able to *reduce* demand for natural gas through the use of clean energy alternatives.

In the Town of New Castle, we understand that bold action is required to meet the State’s climate goals. We support the effort to aggressively implement strategies that decrease the use of fossil fuels. We hope you will comply with our request to extend the moratorium to allow for more thoughtful planning, and we stand ready to work with the PSC, Con Ed, Westchester County, and neighboring communities to promote clean energy usage.

Sincerely,

The New Castle Town Board

The New Castle Planning Board

cc: Senator Pete Harkham
Assemblyman David Buchwald
County Executive George Latimer
County Legislator Mike Kaplowitz
Consolidated Edison
New Castle Development Department