Good evening Everyone - My name is Michelle Leo, I am an IP resident. I really appreciate that you are finally recognizing that - lithium battery energy storage systems **(BESS)** will adversely affect our health and safety by putting forth this vote for a moratorium. While we are thankful for this public hearing, unfortunately it's a little late considering what's happened at Moss landing and at this point we are asking for a full ban with emergency ordinances in residential communities.

What this means is that we are demanding that there are no applications, no permits issued and no approvals within town limits and we want it in writing. Morro Bay has a 45 day ban. This ordinance lasts for 45 days and the city directed staff to return with another ordinance next month extending the urgency ordinance to January 2027. AND WE DEMAND NOTHING LESS!

WHY? Because:

January 16, 2025 Moss Landing Vistra BESS - Lithium Battery Storage System **burned for 5 days and a month later was on fire again. Will Rynland provide Hepa air filters for all of these homes when they have to shelter in place.** And what does that mean anyway? The air still gets through the vents. The Moss landing time line was ridiculous and the Residents weren't notified for many hours after the fires had started

Yet members of this council approved a permit for Rhynland to build their Bess Bomb in My community within the year. Let me state for the record, I spoke with the fire marshal who approved this battery storage for our community and asked him, "why did he not inform the mayor of Island Park? Why did he not inform the IP fire department? Who did he inform?

I also asked also if he was aware that the North Shore received the moratorium and the fire marshal would not sign off. Why do we mean so little that he would sign off on a BESS Bomb in our community? After he asserted that he didn't need to inform anyone, He hung up on me!

Lithium battery BESS have no place in any areas with anything sensitive within 20 miles. They belong nowhere near People's homes, schools, hospitals, and any other sensitive locations or environments. There are no long-term health studies of the impacts of heavy metal toxins, nickel, manganese and cobalt contaminating people and the environment? People are suffering from breathing in the toxic chemicals from the plume of smoke as a result of the Moss landing BESS FIRE.

- Mahopac, NY,
- Duanesburg, NY and
- Amsterdam, NY

All have laws and ordinances banning BESS for the same reason we want it banned in our community.

- Escondido
- Morro bay, CA and
- Yorktown, NY are all considering bans.

In addition, recently there was a community meeting in Staten Island with, NineDot battery developer when the Nine Dot rep, Anthony Santamaria was asked if he would buy a house next to a BESS, he quickly answered no. ***That should tell you something right there.***

State Assemblyman Sam Pirozzolo was present at this meeting and made harsh comments to NineDot. He said "Batteries have nothing to do with clean energy…when these developers talk about keeping power in our neighborhoods.

He called for a "public pressure campaign," and suggested an "Island-wide rally" to tell developers that **"they need to go home."** NineDot said they don't need community permission to install the battery. Staten Island may now have to begin a lawsuit, Will we have a lawsuit?

Supervisor Glenn Church of Monterey County made a public statement "this being the fourth fire incident in a little over five years in Moss Landing, it is obvious that this technology is ahead of both government's ability to regulate it and private industry's ability to control it."

San Jose State University researchers recently announced the discovery of "unusually high concentrations of heavy-metal nanoparticles" in marsh soils close to the Vistra plant, This is key because San Jose State **University professors test the estuaries annually.**

We have miles and miles of estuaries and marshlands here in island park that will all be at risk of contamination.

NO ONE can guarantee that this won't happen again. Everyone is dancing around that question. Why isn't Legislation keeping us safe? Battery developers have clearly circumvented the community of Island Park not even meeting with our schools that are less than a mile away from this battery. A "high probability" that this won't happen again is not good enough. They claim the new BESS are safer but NOT SAFE.

Moss Landing residents now have litigation against the battery developer, will this be us too? Will that be New York? We need to stand united against Governor Hochul and Albany bureaucrats and tell them no not in our communities. LET'S PLAN FOR A BAN because its time to LEARN BEFORE WE BURN! Thank you for your time, I' like to submit my comments to the record.

https://www.duanesburg.net/sites/g/files/vyhlif4351/f/uploads/local_law_no._1_of_2025_re_bess_and_public_utility_4875-0801-7656.pdf

https://www.townofamsterdam.org/wp-content/uploads/2025/01/Local-Law-No.-2-of-2024-Energy-Storage-System.pdf

Heavy metals found

https://hntrbrk.com/vistra-data/

https://www.silive.com/news/2025/02/take-your-battery-projects-elsewhere-staten-island-residents-confront-energy-developer-at-heated-community-board-meeting.html

https://www.ksby.com/morro-bay/morro-bay-approves-ordinance-blocking-battery-energy-systems-within-city-limits

My name is Christina Kramer and I'm a Long Beach resident, Mother of 2, business owner and President of Protect Our Coast, LINY Inc.

1200 people from the rural area of Moss Landing area were evacuated across 8 mile radius and health impacts were recorded up to 30 miles from the 300MW BESS site.

What will an 8 mile evacuation look like in our densely populated communities?

If we had to evacuate just 1mile from the proposed Rhynland 40MW BESS BOMB we would have to evacuate approx 10K residents, – 2mile radius almost 50 K to evacuate. The effects of the Toxic Plume would cause painful impacts and suffering to the North shore, West to Queens and Throughout Suffolk County based on the size of the fire and wind during that event.

Rhynland , I'm sure your lawyers here, know this, **we will never allow this Bess Bomb in our community .** We know you will try to tell us that your Batteries are safer. Maybe you'll say you'll be using Lithium Sodium Phosphate LSP and that solid State State batteries are being developed which all seem to be "safer". But they will leave out that **These batteries burn hotter and will expel higher levels of toxins and they will always be safer but they will never be "SAFE"**

Why burden a community to a developing technology with changing battery chemistries for years to come that will soon be obsolete and preexisting, non-conforming and never required to update even when the codes are updated.

We don't want to be testing ground for first or second generation technology when better, Safer options are being explored. This BESS technology may not even be where energy future is. Ultimately, BESS is "a threat to public health, safety, and welfare".

Today you are making decisions for our families, homes, investments and environments. This is not a game. Energy solutions must benefit — not harm — our communities and natural environments. And for the record we will never get on board with a "for the better good" situation because that only means that some are suffering for the benefit of others.

Governor Hochul's fire agency working group has recommendations by paid consultants ESRG. And these recommendations do nothing to deal with root cause issue of battery instability and toxicity. As elected officials, How do you propose to keep anyone accountable or responsible as technology change over time.

"New York residents who once chanted for Green New Deal policies are quickly learning that "going green" comes with a very real, very flammable downside. The only question left is: How many more battery fires will it take before policymakers admit that their grand plan is a spectacular failure?"

The Moss Landing Battery Fire was just the latest and most frightening example of what can happen if people try to use untested technologies that they don't fully understand to implement policy goals that they don't fully understand or have any truly reachable targets.

Events like this are damaging the public's confidence in utility projects of all types, even those that are safe and that are extremely necessary to keep the lights on.

It's time to take utility system design away from the lobbyists and activists that were never trained to do it and return it to the engineers who spent years getting an education on the design nuances of Power Systems and Utility Systems. We have included a few key scientist we have been learning from. We suggest you do the same.

There is a new facebook group named “Never Again – Moss landing”.

We’re demanding instead we ***NEVER EVER!***

We **also ask that you take legislative action to oppose the RAPID act from destroying “Home Rule” which should be guaranteed to our communities under the NYS Constitution.**

I leave you with one final thought, if you vote yes for these lithium batteries can you accept the responsibility of the risk you’re putting the residents of your communities in?

We need a plan to ban! LET’S LEARN BEFORE WE BURN – LIKE MOSS LANDING!

I’d like to submit my statement for the record.

Dennis Higgins : higgindm@gmail.com

Gary Abraham: gabraham44@eznet.net

Roger Caiazza: roger.caiazza@gmail.com

https://pragmaticenvironmentalistofnewyork.blog/

This is a summary update of recent posts at Pragmatic Environmentalist of New York. I have been writing about the pragmatic balance of the risks and benefits of environmental initiatives in New York since 2017 with a recent emphasis on New York’s Climate Leadership & Community Protection Act (Climate Act). This summary describes each of my recent posts with minimal technical jargon and includes links if you want to read the entire post. If you do not want to be on this mailing list, then let me know. A pdf copy of the following information and previous summaries are also available. The opinions expressed in these articles do not reflect the position of any of my previous employers or any other organization I have been associated with, these comments are mine alone.

Last Minute Comments on the New York Energy Plan

I dropped the ball on this topic. On September 9, 2024 the Hochul Administration initiated the development of the State Energy Plan announcing the release of a draft scope of the plan. Comments are due on December 16. If you read this in time, please consider submitting comments to the

following site. The post describes potential issues, gives some background and suggests text for comments.

The New York Energy Plan will affect the lives of everyone in New York. The Hochul Administration has not been forthcoming about the costs and potential reliability impacts of all the mandates. Clean energy advocates and idealogues are swamping the comments with form letters. If you submit something there will be at least some comments that ask for a reality-based approach. Please submit something on your own or use the following comments including one from reader David Dibbell.

Thank you for the opportunity to comment on Energy Plan Draft Scope. I am concerned that the Draft Scope relies too much on the 2022 Climate Action Council Scoping Plan. The Scoping Plan provides no proof that the strategies in the plan can feasibly meet the energy needs of New York society while maintaining current standards of reliability and affordability. The Energy Plan must prove those standards can be met.

Feasibility: Because reliable, abundant, affordable energy is a prerequisite of our society, the Energy Plan needs to provide details and proof that the Scoping strategies affecting the electric, building, transportation, commercial and industrial sectors will work as proposed. The Energy Plan Scope must emphasize the need for analyses that demonstrate that the proposed transition can meet present standards of reliability and affordability for each sector.

Affordability: The Scoping Plan consumer affordability analysis only considered the costs of the Climate Act mandates and not costs associated with "already implemented policies". The Scope for the Energy Plan should make it clear that affordability analyses will include all costs associated with the Climate Act net-zero transition, no matter the legislative or regulatory mandate.

Electric System Feasibility: The fact that no jurisdiction anywhere has successfully developed an electric system that relies on wind, solar, and energy storage resources to the extent proposed by the Climate Act should be an overriding concern. The Scope notes that "The 2019 Climate Leadership and Community Protection Act guided the preparation of the Scoping Plan". It is concerning that the Energy Plan Scope "will be informed by recommendations made" and "will incorporate and assess energy policy and program recommendations" of the 2022 New York State Climate Action Council Scoping Plan. The Scoping Plan failed to demonstrate that its proposed strategies can feasibly maintain current levels of reliability, affordability, environmental and public health impacts, and economic growth. The Scope for the Energy Plan should emphasize the need to prove the Scoping Plan strategies will work.

DEFR: The agencies and organizations responsible for electric system reliability agree that during periods of extended low wind and solar resource availability, a new dispatchable emissions-free resource (DEFR) is needed. Because there are technological hurdles that must be overcome, resolving the feasibility of

DEFR while maintaining reliability and affordability standards must be a stated priority for the Energy Plan Scope.

Section VII Nuclear Energy: Consideration of reliable, non-emitting nuclear power generation raises an important point about the timing and order of decisions. An early choice to pursue a menu of nuclear options as a primary element of the plan obviates the need to promote intermittent wind and solar sources. Minimizing the adoption of new intermittent wind and solar sources (for grid supply) also minimizes the need for costly storage systems. A future nuclear-focused system could end up as the lowest-overall-cost, highest-reliability configuration to support the multiple end-goals of the Plan. Therefore, it is important to address this strategy choice early, supported by comprehensive cost and feasibility studies for the system as a whole. Otherwise, the pressure to reduce emissions will drive a proliferation of current-technology intermittent sources and storage systems to the detriment of overall cost and reliability. This would be a most regrettable outcome.

Transparency: The Climate Act mandated transition of the New York energy system is an extraordinarily complicated experiment because of its scope, magnitude, and technological challenges. To ensure that all aspects of the issues associated with this experiment are addressed it is appropriate to publish all comments received and the disposition of the comments. It is important that the Energy Planning Board be aware of all topics raised by the commenters. In fact, it is so important that controversial topics and inconsistencies between independent analyses should be reconciled through a public process. The Energy Plan Scope should acknowledge this requirement.

Get Charged Up for the New York State Energy Plan

On November 15 New Yorkers for Clean Power (NYCP) sponsored an Energy Plan webinar titled "Get Charged Up for the New York Energy Plan" that was designed to encourage their members to submit comments. This post addresses the presentation by Janet Joseph, a former employee at the New York State Energy Research & Development Authority (NYSERDA) who managed work associated with the Climate Act Scoping Plan.

It was interesting that Janet Joseph recognized that reliability and affordability are real. Then she said that "the advocacy community must be armed to fight that battle and address the impact on reliability and affordability as best you can." The insurmountable problem with that is reality bats last. I described a couple of issues with the presentation. I think she played down uncertainties too much and I don't think that the Energy Plan should rely on the Scoping Plan as she proposed.

DEFR Implications on Solar Power Viability

In the previous update described a Syracuse Post Standard description of the transition problem by Tim Knauss who summarized the work done by Cornell's Anderson Lab headed by Dr. Lindsay Anderson. I submitted a letter to the editor describing the implications of Anderson's work arguing that pausing renewable energy development would be appropriate. This post responds to the rebuttal of my letter

by Peter Wirth, Vice President, Climate Change Awareness and Actionwho claims that pausing renewable energy is the last thing we should do.

I described two problems with Wirth's response. He claimed that solar is the cheapest form of energy. I showed that if the consumer cost for delivered energy is considered, then solar is not the "least expensive". Secondly, Wirth did not acknowledge that until the feasibility of DEFR technology is resolved solar and wind resources may not be viable. Anderson and responsible agencies all agree that new DEFR technologies are needed to make a solar and wind-reliant electric energy system work reliably. No one knows what those technologies are. I believe the only likely viable DEFR backup technology is nuclear generation because it is the only candidate resource that is technologically ready, can be expanded as needed, and does not push the limits of physics.

September New York Dunkelflaute or Wind Lull

I finally got around to addressing a Parker Gallant article that found industrial wind turbines (IWT) in Ontario "show up at the party, almost always, after everyone has left". I looked at New York data for the same period that prompted his post and found that wind data was also poor in the state at the same time. The most notable example is that on 13 September at hour 12 only 0.2 MW of wind power out of a state total of 2,454 MW were generated. Over a 192-hour period in September there were 96 hours representing half the period when the capacity of all the wind generation in New York was less than 5%. Over the whole period all but one of the hours had a capacity factor of less than 20%.

There are implications of these observations relative to the Climate Act transition to an electric system that relies on wind, solar, and energy storage capacity. The fact that all of the New York wind generation only produced 0.2 MW one hour must mean that the weather conditions causing the problem were at least as big as New York including the offshore wind facility south of Long Island. I believe that New York electric planners are addressing this issue. However, I will only feel comfortable that they have considered the worst-case situation when they assess adjacent electric system control areas and a longer period of data than has been used to date.

Unfortunately, clean energy advocates continue to dismiss the extent of the problem. Even worse, some do not acknowledge that wind, solar, and energy storage cannot be relied on during those periods and that when the power is needed the most it is most likely to be in a resource lull. These advocates are simply wrong and should be ignored.

EPA's "Insurance Policy" Against Trump

I saw this article earlier this week and think it raises an important issue EPA Advisor: Agency Is Funneling Billions To Climate Cult Groups As "Insurance Policy" Against Trump. It documents that Environmental Protection Agency staff are "frantically shoveling billions in grants to nonprofits, making sure that the Biden administration's climate projects stay afloat — no matter who's in charge." When someone admits that "it's like we're on the Titanic and we're throwing gold bars off the edge" I get upset.

In addition to the obvious dishonesty, waste, fraud, and other misconduct evident in these revelations,

the problem is that the non-profits targeted for the EPA "insurance" funds have no reason to balance expectations and potential solutions. They will never be satisfied because that ends the funding stream. It also gives politicians and regulators a dependable demographic to support ever more stringent regulations. I am also concerned that "Scrambling to push money out the door" is an invitation for poor oversight and management.

Keith Schue: Empire Report – New York Needs Nuclear

Keith Schue alerted me to his piece for the Empire Report titled New York Needs Nuclear, a Balanced Approach to Clean Energy. I published the piece and made a couple of comments. I recommend reading the document because I agree with him that nuclear power is necessary and that NYPA should be considering it along with solar and wind in their Draft Renewables Plan.

Commentary on Recent Articles

This article highlights that I think might be of interest to my readers with a bit of context. I have described a few of these below.

> Ron Stein describes Governor Newsom's "obliviousness to the reality that the so-called energy transition is only an electricity transition". He concludes that "It is appalling that wealthy California, with its 'green mandates,' continues to burden its residents with humongous costs to transition to just electricity and support unethical, immoral, and hypocritical actions to obtain exotic minerals and metals from poorer developing countries to achieve that electricity transition."

> Irina Slav has a knack for making me laugh when she describes idiotic climate transition policies. In this post she describes the latest climate policy meeting (the Conference of Parties) created a global carbon market.

> Thomas Shepstone describes an analysis by William Kininmonth that concludes "Recent global warming has its origins in ocean warming, is natural, and has nothing to do with changing atmospheric carbon dioxide concentrations."

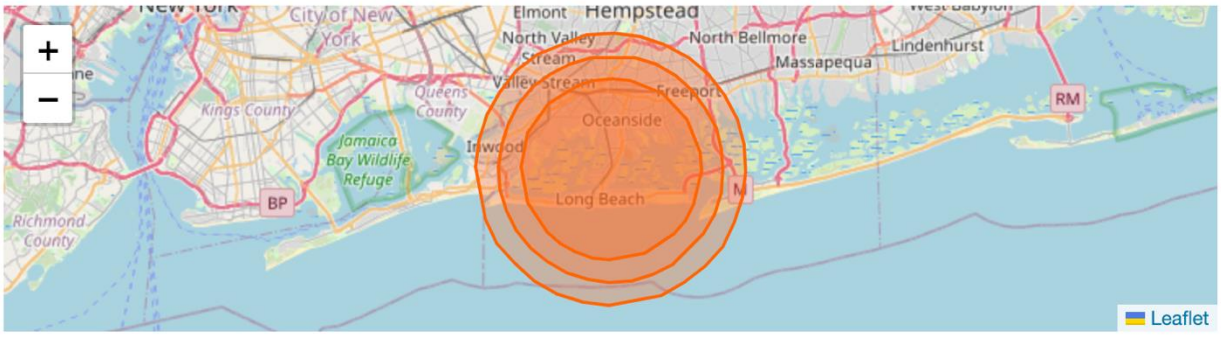
> Two examples why Weather is not climate The first example calls out the mainstream media mistakenly claiming an extreme weather event is caused by climate change was written by Dr. Cliff Mass. He explained that when the press has reached out to him for comments about the recent extreme weather events in the Pacific NW, he refuted their claims that bomb cyclones and atmospheric rivers have become either more frequent or more powerful. "The

data just doesn't support such claims." In the second, Roger Pielke, Jr. describes and eviscerates claimes where the Washington Post pushes the narrative that extreme weather events are incontrovertibly exacerbated by climate change.

Roger Caiazza

Your Radius Report is ready

4, 5 and 6 miles around



Demographics

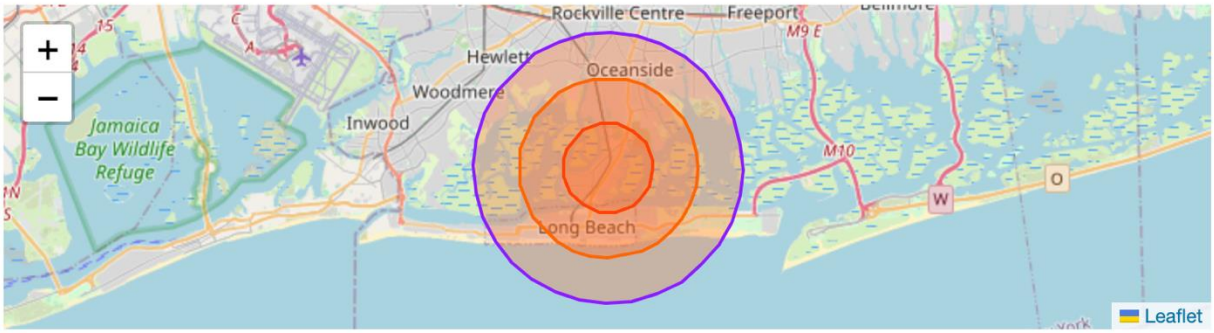
Population

	4 miles	5 miles	6 miles
Population	169,330	280,926	443,818
Population Density	[illegible]	[illegible]	[illegible]

Source: U.S. Census Bureau, 2023 American Community Survey, Tables B01003

Your Radius Report is ready

1, 2 and 3 miles around



Demographics

Population

	1 mile	2 miles	3 miles
Population	9,978	48,626	91,461
Population Density	[illegible]	[illegible]	[illegible]

Source: U.S. Census Bureau, 2023 American Community Survey, Tables B01003

I lived in Santa Barbara for 8 years, 1965 to 1973. My PhD is from the Univ. of Calif. It was a wonderful place back then. Politically it has since gone off the rails.

I am not surprised the BESS is still burning. No way to put out these fires: they burn themselves out. The National Fire Protection Association (NFPA) pointed this out, years ago.

Shiree, do you know a couple (husband/wife) or individual (male/female) who is extremely tidy and clean who desperately needs to get out of the Moss Landing Toxic Zone and yet has no place to go? (No pets. No kids. No smoking.) Quiet, calm, tidy, organized, clean person or couple.

Back to the Moss Landing Toxic Zone (MLTZ). Judging from comparable toxic disasters over the past decades (e.g., Alcoa and GM in Massena, NY; Love Canal, NY; Palestine, Ohio; Flint, Michigan; Deepwater Horizon oil rig blowout, Gulf Coast), I now realize that neither the state or federal government is going to do anything about MLTZ. Both levels of government will do what they're going now: denial, slow-walking assistance, cover-up, gas-lighting, etc. In the hope that all of you will eventually shut up or otherwise drift off into some kind of oblivion, and that Mother Nature will eventually cleanse the

landscape of the toxins — in 30 years. The illnesses triggered by the toxic fallout will be YOUR concern, YOUR problem. Just as the manifold illnesses triggered by the (man-made) Covid virus and subsequent "vaccine" are YOUR problem. Even Trump is ignoring MLTZ.

The best you MLTZ victims can hope for is a degree of financial compensation from lawsuits, although nothing will give you back your health or fix the gnawing, intractable PTSD you are all suffering.

Shiree, for decades Nina and I have been in the forefront of fighting wind turbines. Globally. Nina's interest has been that turbines make people sick — sick enough to actually lock the front door of their homes and abandon them. (She wrote a book on this in 2009: "Wind Turbine Syndrome: A Report on a Natural Experiment.") To her horror, she discovered that the wind industry and colluding governments denied all this, gas-lighting victims and physicians like Nina who tried to intervene. I say this because I have seen on the Moss Landing Facebook page that some people have in fact left their homes, seemingly for good. As draconian as that sounds — as impossible as it sounds — it makes sense to me. I half think it is the best course to take: cut one's losses and walk away. I say this with Love Canal (NY), Palestine (Ohio), GM/Alcoa (NY), Flint (Michigan) in mind.

I weep for you people.

♡ Calvin

19clay@gmail.com

Please, yes! Push this out! Post anywhere in any manner! Yes, with my comments. My comments are crucial.

Please please do this! At least this frames the issue properly. This is the proper paradigm. It takes it out of the realm of some "local mishap" to the national horror and disgrace and outrage that it is!

I am sick over this. So is my wife. It is the horror I never thought would happen. I'm 77. I've lived through a lot. I'm a professional historian. Taught at an Ivy League university (Rutgers) for 20 years. Gave people PhDs. And this event eclipses so much of the horror I taught as a historian. It is a Toxicological Holocaust — with slow death through slow disease and disability and debility. Slow. Insidious. Gnawing at you. Day after day. Plus the intractable PTSD. (To write those words—those bitter words—makes me recoil to my soul! Makes me want to vomit. I write these words with tears in my eyes — kinda hard to see.)

Not only people, but the Innocent Earth—the Caring and Trusting Earth along with the Trusting and Caring and Innocent People.

Make no mistake: Let no one minimize this! The county and state and feds are endeavoring to do just that — but your body — your lungs — looking across the room at your beloved wife — looking around your beloved home — tell you that they are lying. The Big Lie! The Grotesque Lie.

Hannah Arendt, writing about the Eichmann trial in Jerusalem, coined the chilling phrase, "the banality of evil." That's what you are experiencing in the aftermath of this fire. Except, it's not the aftermath; it's on-going. The banality of cascading evil.

Shout this from the house-tops!

(You are welcome to post this email, as well. Post and push it out.)

Calvin

Calvin Luther Martin, PhD (ret. Rutgers Univ. professor)

Publisher, K-Selected Books

19 Clay, Malone NY 12953

518-348-4731

19clay@gmail.com

single-page c.v.

RiverCityMalone.com

TheAmassingHarmony.com

calvinluthermartin.com

amazon author page

Richard Ellenbogen- Solution possibilities

The attached document was filed with the Public Service Commission over the weekend as part of hearing 15-E-0302.

It is not inexpensive but it is much less expensive than other solutions that the state has been looking at. Cost comparisons are included in the document.

Additionally, the energy math works and it adheres to the Laws of Thermodynamics.

In light of the NYISO statement this past November that NY State may not have sufficient energy to run its system by 2033, this plan deserves serious consideration.

The equipment and technology to implement this actually exists at utility scale today. It doesn't require betting on a hope and a prayer that a new technology will save us and in any case, that would take several decades at a minimum. That is time that we don't have.

It involves the retooling of Long Island's three older power plants and adding another plant at Caithness where they wanted to build one several years ago.

By reusing existing sites, it avoids the need for new and expensive transmission and gas infrastructure.

The emissions from the retooled plants will be a fraction of what they are now and they will be 90% CO2 free. It will take the emissions of the three plants on the left in the chart below and make them look more like the Caithness plant on the right.

As the generation will be firm and dispatchable, it will also eliminate the immediate need for Lithium Ion Battery Storage until a safer storage technology is developed at utility scale.

Depending upon how much generation the state actually installs, it might also allow for closing the peaker plants in NY City reducing those emissions

The CO2 resulting from the power generation would be buried in wells 10,0000 feet under the Atlantic Ocean, far enough from land that it wouldn't impact sight lines or water quality on Long Island and that is figured into the cost. Because of the sequestration depth, it would not acidify the ocean in the same way that CO2 released into the atmosphere does.

It "only" results in generation that is 90% CO2 free and not 100% and it will use natural gas but it will use 30% to 40% less gas than what is being used now. As a result, the purists may not like it but they have not presented any plan in the past five years where all of the technology actually exists and that can actually be implemented within several decades.

When I started looking at this, I was expecting the costs to be astronomical and they aren't cheap. However, what NY State has been proposing for the past five years is so ridiculously expensive that it makes this look like a bargain, especially since it will provide reliable energy where the prior plans would not.

I have no monetary interest in any of these technologies and I just spent several hundred hours of my own time researching this, speaking with people that work with the technology, and reading through numerous documents with no expectation of compensation. That can't be said for many of the proposals before NY State which are going to line pockets at taxpayer expense without providing safe, cost effective, and firm generation in return.

Rich Ellenbogen

NEW YORK STATE
PUBLIC SERVICE COMMISSION

Case 15-E-0302 – Proceeding on Motion of the Commission to Implement a Large-Scale Renewable Program and Clean Energy Standard

---

COMMENTS BY RICHARD ELLENBOGEN ON UTILITY SYSTEM DECARBONIZATION USING EXISTING TECHNOLOGIES

February 16, 2025

I can provide this PDF on request.