

Dear Ben,

Thanks again for your time on the phone recently.

I've been following the SB-191 process as well as other energy issues and developments throughout New England.

Energy Secretary Moniz being in RI and CT tomorrow is terrific. The QER team asked for comments from the public for tomorrow's two state work sessions.

Perhaps the note here to QER is also relevant { I believe it is } to the SB-191 scope.

Thanks for considering it.

Sincerely,

Larry Goodman
Hebron, NH

Dear QER Review Task Force & DOE Analysis Team:

My name is Larry Goodman. I am a resident of Hebron NH and I am very aware of the significant energy issues facing New England.

First of all, thank you for this well timed and necessary conference. The points raised in your 11 page "energy constraints" document are basically identical to the points raised by ISO-NE in their comprehensive January, 17th 2014 letter to Secretary Bose of FERC.

Clearly the issues of reliability, affordability and the ability to perform during scarcity conditions are critical to NE'S energy future. As ISO-NE's document to FERC stated: "a structural bias in the FCM to clear less reliable resources is eroding reliability over time."

I am particularly concerned with non-dispatchable "renewable" generation sources that require huge transmission resources and are unable to ever replace baseload power generation anywhere in the ISO-NE footprint.

You are undoubtedly very familiar with the New England Wind Integration Study { NEWIS }. As you know this very comprehensive document looked at wind's potential role in New England and it was authored by three companies directly involved, financially, with industrial scale wind.

Now that both you and ISO-NE have focused on performance metrics as they impact dispatchable and predictable reliability, allow me to highlight the following from the NEWIS:

"The capacity value of wind is dominated by the wind performance during just a few **hours** of the **year** when load demand is high."

"Wind delivers minimum production in peak load months."

"No conventional generation is eliminated as wind is added."

And, since natural gas is clearly the baseload source that NE relies on most, please consider the following:

"Although displacement of fossil fuel generation might be one of the objectives of regional energy policies, a consequence is that it {wind} may **radically** change the market economics for all resources on the system **but especially for the natural gas fired resources that are displaced.**"

"Capacity prices from these {gas} plants will likely need to increase if they are to remain economically viable. Higher onpeak/offpeak price differential is created."

The impact of more emphasis on a non-dispatchable "renewable" that can only displace gas, not coal or oil in NE, is expected to result in higher prices for gas and/or gas plant closings. {NEWIS }

You know better than I do obviously that we can't afford higher prices or to lose any natural gas capacity. ISO-NE's letter to FERC was clear in its purpose and intent. There are plenty of renewable options in New England that can deliver dispatchable baseload power.

"Increased wind generation will displace {minimally} other supply side resources {gas} and **reduce** the flexibility of the dispatchable generation mix."

This is exactly what we don't need in New England! Wind is, apparently, the most expensive and least effective way to reduce carbon in New England. There are more effective and efficient renewable options that can deliver during scarcity conditions and do not play havoc with the reliability and affordability of the Grid.

Industrial scale wind in NE is a dinosaur. Please do not allow it to continue to receive preferential treatment at the expense of the ratepayers in NE and at the expense of the safety and reliability of the grid itself.