



**DARREN SUAREZ**  
Director of Government Affairs

July 11, 2014

New York State Department of Environmental Conservation  
Office of Hearings and Mediation Services  
ATTN: Administrative Law Judge Maria E. Villa  
625 Broadway, 1st Floor  
Albany, New York 12233-1550  
mevilla@gw.dec.state.ny.us

RE: Seasonal Operation of Indian Point

Dear Judge Maria E. Villa:

On behalf of the Business Council of New York State, a business organization representing the interests of thousands of large and small companies, chambers of commerce, and professional and trade associations throughout New York State, I urge the Department of Environmental Conservation to adopt the cylindrical wedgewire screen proposal for the Indian Point Energy Center in Buchanan.

The Indian Point Energy Center is essential to the New York State economy. This electrical generation facility provides 2,069 megawatts of baseload power to New York's electrical grid 24 hours a day, 7 days a week, and 365 days of the year. Indian Point accounts for up to 11% of the power used statewide and 25% of Westchester County and New York City's power.

Indian Point not only serves as one of the state's largest power generators, but also provides essential voltage support to ensure the distribution and transmission of power throughout New York's electric grid.

Therefore, any proposal to force Indian Point to shut down especially in the summer months when the power is needed the most will significantly increase prices and significantly decrease reliability.

Electricity price increases from even a partial closure of Indian Point would amount to billions of dollars. Energy consulting firm Charles River Associates found in a 2011 study for the New York City Department of Environmental Protection found that closing Indian Point entirely would increase costs to New York State consumers by \$10-\$12 billion through 2030. New York City residents would see increases of \$300 million more for electricity each year.

The New York Independent System Operator has stated numerous times that Indian Point's closure would drastically reduce grid reliability resulting in blackouts, brownouts, economic disruption, and serious safety issues.

Additionally, NYISO's 2013 Reliability Needs Assessment (RNA) states that under stress conditions, the voltage performance on the system without Indian Point would be degraded.

To address impingement, entrainment, and heat shock at Indian Point, Entergy has proposed the use of cylindrical wedgewire screens (CWW). There is considerable industry literature on the deployment of CWW screens. In addition CWW screens have been used at Oak Creek Power Plant in Milwaukee, WI which has a total flow rate comparable with the total flow rate of Units 2 and 3. Furthermore, because CWW screens are designed to pass a certain amount of flow through a certain screening area, the design considered for Units 2 and 3 would not be a larger scale version of this proven technology, but would merely require a greater number of the same size screens that have been utilized elsewhere.

Communities across the state and particularly in the Lower Hudson Valley rely on the power provided by Indian Point to keep their businesses operating, keep the lights on in their homes, and make sure their electricity costs don't skyrocket.

Closing Indian Point during the summer would cause major electric service disruptions and exponential increases in electricity rates that would affect everyone's bottom lines. It would result in layoffs, lack of new hires, and some might be forced to relocate their businesses elsewhere. This reduction in the ability to keep and expand jobs, as well as an exodus of business, residents, and the associated capital would have serious negative implications for the local tax base and on property values.

In the interests of all New Yorkers, the DEC should support the reasonable and effective cylindrical wedgewire screen proposal for Indian Point Energy Center.

Thank you for your time and considering my comments on this issue.  
Sincerely,

Darren Suarez  
Director of Government Affairs  
The Business Council of New York State