



June 8, 2020

Honorable John Rhodes, Chair, and
Hon. James Alesi, Diane Burman, Tracey Edwards and John Howard, Commissioners
New York State Public Service Commission
Three Empire State Plaza
Albany, NY 12223-1350

**RE: 19-E-0718 Petition of Greenidge Generation LLC for a Declaratory Ruling
Regarding Jurisdiction and Continued Application of Lightened Regulation
(Nov. 2019) and**

**20-E-0044 Petition of Greenidge Generation LLC for a Declaratory Ruling
Concerning the Furnishing and/or Sale of Unmetered Electric Power to
Tenants Leasing Space at the Greenidge Site and Alternate Petition for
Amendment of its Section 68 Certificate to Permit Such Furnishing and/or
Sales Case (Jan. 2020)**

Dear Commissioners:

Fossil Free Tompkins is writing to request that the above referenced petitions be removed from the consent agenda of the June 11th meeting of the Public Service Commission. I regret that I was not aware of these petitions prior to publication of the preliminary agenda and hence was not able to file comments in a more timely fashion. I hope that the Commission will nonetheless consider the merits of our concerns regarding the incompatibility of the petitions with the Climate Leadership and Community Protection Act and will remove the petitions from the agenda to allow further consideration. Additionally, we have overall concerns about the paucity of information in the administrative record, which lacks a SEQR review or any comments by DPS staff.

The Greenidge Generation petitions are prompted by its new business plan to lease a portion of their property to a cryptocurrency tenant (Greenidge Coin) and to sell behind-the-meter electric supply to the data center.

The Greenidge plant is an inefficient 106.3 MW single-cycle steam-turbine generating station constructed in 1953. Originally a coal-burning plant, in 2011 it was placed in protective layup and the owners (AES) subsequently declared bankruptcy. The plant was acquired by Greenidge Generation LLC in 2014, and in 2015-2017 it was converted to burn gas and wood. The Commission granted Greenidge Generation a Certificate of Public Convenience and Necessity with light regulation in Sept 2016 (15-E-0516) and the plant was reactivated in May 2017.

According to the NYISO Gold Book, since reactivation, the plant has operated at 17.8%, 21.8% and 6% capacity factor in 2017, 2018, and 2019 respectively.

The current petitions do not specify the operating load of the cryptocurrency tenant; however it is clear from the description that the plant will operate at a much higher capacity factor than has occurred since the plant was reactivated. In describing the economic viability of the proposed plan to house up to 30 data center trailers on the Greenidge site, the petition states "...because the Greenidge Facility will be **operating in base load mode**, it will be available to ramp its remaining output up or down rapidly to respond to NYISO's ever-changing power needs."¹

The extent of Greenidge Coin's ambitions is revealed on their website:

The site has several attributes that make it highly competitive globally, including ... access to the cheapest natural gas in the United States through its connection to the Empire Pipeline System²

Access to natural gas from the Empire Pipeline System and an in-house natural gas power plant enable Greenidge's mining operation to secure fixed energy pricing for the foreseeable future... With institutional backing, strategic industry partnerships, enterprise-level operational excellence, a real estate of 150 acres on site and a power plant capable of generating over 100MW of clean energy an hour, Greenidge's scalability is limited only by imagination.³

Clearly, under the Greenidge cryptocurrency proposal, this inefficient fossil-fuel plant will be operating at a significantly higher capacity factor, resulting in a marked increase in greenhouse gas emissions.

Fossil Free Tompkins asserts that the increased reliance on fossil-fuel generation from an inefficient, single-cycle plant, and the resulting increase in greenhouse gas emissions from the Greenidge cryptocurrency operation are inconsistent with the greenhouse gas reduction and renewable energy goals prescribed in the Climate Leadership and Community Protection Act. Hence, we ask that the Greenidge petitions be removed from the June 11th consent agenda to allow further consideration of these concerns within the dockets.

Further, we note that there are multiple data center projects being proposed at old power plant sites in upstate NY, each with significant load projections. The Greenidge decision could establish precedent for subsequent data center projects, thus compounding the emission concerns.

¹ 20-E-0044, [Petition Of Greenidge Generation LLC For A Declaratory Ruling Concerning The Furnishing And/Or Sale Of Unmetered Electric Power To Tenants](#) p. 15

² Greenidge Press Release, March 5, 2020 <https://greenidgellc.com/press-releases/greenidge-generation-announces-data-center-for-digital-currencies>

³ Greenidge Website, Blockchain page <https://greenidgellc.com/blockchain>

The CLCPA recommends the formation of an advisory group to address the needs of energy intensive industries, as well as an advisory group to address transition plans for legacy electric generating facilities. We suggest the time might be ripe to begin such discussions.

Thank you for consideration of these concerns.

With much appreciation for the work you do.

Sincerely,

/s/

Irene Weiser
Coordinator, Fossil Free Tompkins
Ithaca, NY
irene32340@gmail.com
607.435.3010

cc: George M. Pond, Esq.
Attorney for Greenidge Generation LLC