



December 17, 2012

Via E-Mail [secretary@dps.ny.gov](mailto:secretary@dps.ny.gov)

Honorable Jaclyn A. Brillong  
Secretary  
New York State Public Service Commission  
Three Empire State Plaza  
Albany, New York 12223

**RE: Case 03-E-0188: Proceeding on Motion of the Commission Regarding a Retail Renewable Portfolio Standard**

Dear Secretary Brillong:

The Pace Energy and Climate Center (“Pace”) appreciates the opportunity to file these comments in general support of ACE NY’s comments<sup>1</sup> on the Distributed Wind Energy and Sustainable Energy Developments request for programmatic changes to the Renewable Portfolio Standard.<sup>2</sup>

Pace recognizes the economic and environmental imperative to aggressively scale up renewable resources in the state—including on-site wind projects. In order to be as effective as possible, programs need to evolve to reflect changing market conditions and technology developments. We concur with ACE NY in their support of “the exploration of how best to provide incentives to small and community wind projects that currently cannot participate in the Customer-Sited Tier”. Also consistent with ACE NY’s position, we support removing the \$400,000 cap that has to date impeded the deployment of these installations.

Finally, Pace has long supported the development of a generation attribute tracking system in New York. With the recently enacted legislation, we are pleased to see the state moving forward with this long overdue step. Doing so will not only cultivate the market for distributed wind, but all technologies supported by the RPS. We look forward to actively participating in that process, and urge NYSERDA to initiate it without delay.

Respectfully submitted,

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<sup>1</sup> [ACE NY Comments RE: Case 03-E-0188: Proceeding on Motion of the Commission Regarding a Retail Renewable Portfolio Standard](#). Submitted December 17, 2012

<sup>2</sup> [Distributed Wind Energy and Sustainable Energy Developments requests to offer programmatic changes to the Renewable Portfolio Standard](#). Submitted October 2, 2012