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September 9, 2013

BY ELECTRONIC DELIVERY

Hon. Kathleen H. Burgess
Secretary to the Commission
New York State Public Service Commission
Empire State Plaza
Agency Building 3
Albany, NY 12223-1350

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

Dear Secretary Burgess:

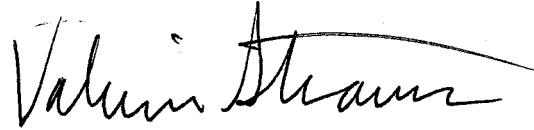
The Alliance for Clean Energy New York (“ACE NY”) submits this brief correspondence in the above-referenced proceeding in response to the notice soliciting comments on the *Petition for Rehearing of H.Q. Energy Services (U.S.) Inc.*, published by the New York State Public Service Commission (“Commission”) in the July 24, 2013 edition of the *New York State Register*. ACE NY encourages the Commission to reject the petitioner’s request for rehearing of the *Order Modifying Renewable Portfolio Standard Program Eligibility Requirements* (“Order”), issued May 22, 2013, and uphold the Order’s directive limiting eligibility for participation in the Main Tier of the Renewable Portfolio Standard (“RPS”) to projects located within New York State.

ACE NY submitted both initial and reply comments supporting the petition of the New York State Energy Research and Development Authority (“NYSERDA”) requesting that the Commission issue an order revising the RPS program rules to limit its solicitation and procurement of RPS attributes from Main Tier renewable energy projects to those located within New York State. Our stance remains unchanged and we view the Order as consistent with the multiple goals of the RPS and overall state energy policy.

NYSERDA recently submitted to the Commission its *Renewable Portfolio Standard Main Tier 2013 Program Review*, which demonstrates a substantial positive impact of the Main Tier on the state’s economy and environment. We believe that the in-

state eligibility requirement further enhances the economic development component of the RPS by ensuring the continuation of direct investments in New York State.

Respectfully Submitted,

A handwritten signature in black ink, appearing to read "Valerie Strauss". The signature is fluid and cursive, with a long horizontal flourish extending to the right.

Valerie Strauss, Interim Executive Director
Alliance for Clean Energy New York