



February 15, 2013

**New York State
Public Service Commission
Case 03-E-0188**

Proceeding on Motion of the Commission Regarding a Retail Renewable Portfolio Standard

**COMMENTS OF RIDGELINE ENERGY ON THE PETITION FOR MODIFICATION OF RENEWABLE PORTFOLIO STANDARD MAIN
TIER PROGRAM ELIGIBILITY**

Introduction:

Ridgeline Energy LLC (Ridgeline) is a renewable energy developer with a number of projects in operation and under development across the United States. With an office in Albany, Ridgeline is developing Community Scale wind projects that connect to the State's sub-transmission voltage lines and are sited inside transmission constrained areas. Community Scale projects are designed to best serve the communities in which they are located, bringing substantial economic development while helping the State meet its renewable energy goals. Community Scale wind projects provide economic benefits to the local community at a level disproportionate to their relatively modest size, and create jobs and direct commercial opportunities for the surrounding region and the State of New York.

Comments on NYSERDA December 14th 2012 Petition for Modification of Renewable Portfolio Standard Main Tier Program:

NYSERDA's petition correctly points out that economic benefits are one of the primary objectives of the Renewable Portfolio Standard (RPS). Along with economic benefits other objectives of the RPS include the promotion of environmental improvement, energy supply security and resource diversity. As reiterated in the Renewable Energy Assessment of the 2009 State Energy Plan, these objectives are to be achieved at a reasonable cost to ratepayers. As the Central Procurement Administrator for the RPS, NYSERDA is tasked with contracting for Renewable Energy Certificates (RECs) in the most cost effective manner given its mandate. Occasionally out-of state facilities have won contract awards through the competitive Main Tier Solicitations operated by NYSERDA.

Granting NYSERDA's petition to exclude out of state projects could put pressure on prices by limiting supply. Offering longer term contracts would help mitigate the potential for increase in average REC prices resulting from excluding operating out-of-state facilities. Increasing contract terms from 10 years to 20 years would allow NYSERDA to pay less for each MWh it contracts, regardless of where a facility is located. Long term contracts to all award recipients will yield the best return on ratepayer investment, consistent with the goals of the RPS program.

Sincerely,

A handwritten signature in blue ink that reads "Owen Grant". The signature is fluid and cursive, with the first name "Owen" and last name "Grant" clearly distinguishable.

Owen Grant
Project Manager