

November 21, 2012

Jaclyn A. Brillling, Secretary
Public Service Commission
Three Empire State Plaza
Albany, NY 12223-1350

**SUPPORT of Petition on Case: 03-E-0188
filed October 2, 2012 by Distributed Wind Energy Association (DWEA)
and Sustainable Energy Developments (SED)**

VERGNET SA strongly supports the programmatic changes requested by DWEA and SED to the Renewable Portfolio Standard (RPS) as it specifically relates to On-Site Wind development in the Customer-Site Tier (CST). The requested changes will ensure a more level playing field for renewable technologies to compete in New York, so that the most cost effective and developmentally appropriate solutions are pursued.

We urge the Commission to collectively implement all of the following actions to maintain the diversity of renewable energy choices within the State.

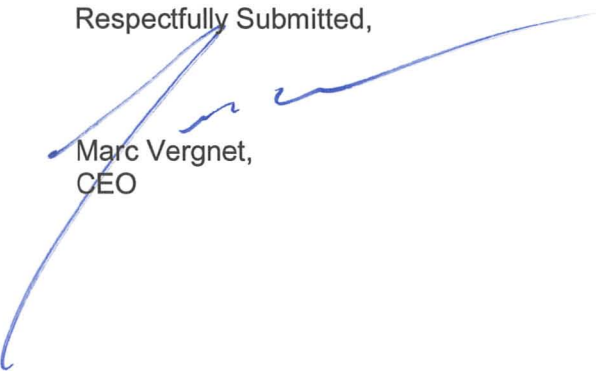
- Remove the \$400,000 funding cap for On-Site wind
- Establish a competitive solicitation for Customer-Sited wind similar to the structure proposed for the *NY Sun Initiative*
- Establish competitive access for customer-site and community wind energy projects in the main Tier of the PRS
- Implement the recently enacted Generation Attribute Tracking System as soon as possible

By enacting these suggested changes to the RPS, the Commission will strengthen New York's clean energy economic and develop a diversified portfolio of distributed generation projects. The *NY Sun Initiative* is positioned to radically increase solar power development in New York. The changes requested will result in similar success for distributed wind, as well as other clean energy technologies that will translate to job creation and increased economical growth within our business and the communities where we live and work.

Therefore, we urge the Public Service Commission to enact the requested changes to the RPS related to On-Site Wind development in the CST.

Thank you for your time and immediate attention to this matter.

Respectfully Submitted,



Marc Vergnet,
CEO