

George M. Pond  
Partner

July 17, 2018

Hon. Kathleen H. Burgess  
Secretary  
New York State Public Service Commission  
3 Empire Plaza  
Albany, New York 12223

**RE Proceeding on Motion of the Commission to Implement a Large-Scale  
Renewable Program and a Clean Energy Standard  
Case 15-E-0302**

Dear Secretary Burgess:

On July 14, 2017, the Commission issued an Order Modifying Compliance Payment (the “July 14 Order”) in the above-mentioned proceeding for Liberty Power Holdings, LLC (“Liberty”) and approved a 35% reduction in the amount of Zero Emissions Credits (“ZECs”) that Liberty was required to purchase from the New York State Electric Research and Development Authority. While we greatly appreciate the Commission’s findings in the July 14 Order, Liberty, unfortunately, continues to experience further declines in its retail load in New York State since the issuance of the July 14 Order. Accordingly, in the attached request, Liberty respectfully submits a request to the Commission to exercise its discretion and order a further reduction in Liberty’s ZEC obligation.

If you have any questions regarding this matter, please do not hesitate to contact the undersigned directly.

Respectfully submitted,

/s/ George M. Pond

George M. Pond

*Attorney for Liberty Power Holdings LLC*

cc: Garson Knapp, Esq.