May 23rd, 2018
180 Main Avenue
Wynantskill, NY 12198

SUBJECT: Case 15-E-0751, Case 15-E-0082, & Matter 17-01276

To the Hon. Kathleen H. Burgess, Secretary

Please see our comments below in response to the Notice Soliciting Comments on Staff Proposal and Related Matters issued on May 22nd, 2018.

1. Interzonal Crediting - Should a DER, eligible for and receiving compensation based on the VDER value stack tariff, be permitted to apply the credits it receives to the bills of customers in the same utility territory as the DER but a different New York Independent System Operator (NYISO) load zone, either through CDG or through single customer remote crediting?

DER should be eligible for interzonal crediting within the same utility territory independent of NYISO load zones. This eligibility should not just be offered to those DER that are receiving VDER value stack compensation, but for all DER that were previously installed and grandfathered under NEM compensation, especially monetary remote net metering. There are clients of High Peaks Solar’s that need this to be allowed in order to utilize all of their current on site solar generation, so this issue is especially important to them.

Also, in the nascent CDG market, our company has found it difficult to sell CDG subscriptions in the various geographical load zones. Our base is in load zone F, while we have developed CDG projects throughout the entirety of New York State. Being able to sell those subscriptions locally would expand our growth within the CDG market by allowing more flexibility within the customer pool. It would also reduce soft costs for many companies, while allowing the goals of REV to be achieved more rapidly.
We strongly support the removal of the interzonal crediting barrier for those DER within the same utility territory, despite being in different NYISO load zones.

2. CDG Subscription Sizes – Currently, each CDG member must take a percentage of the DER facility’s output that amounts to at least a minimum of 1,000 kWh annually. Should this subscription size be lowered to facilitate the participation of customers who wish to take smaller subscriptions?

High Peaks Solar feels removing the minimum subscription level for CDG participation is important. Turning these groups of customers away from CDG participation is counter intuitive. Speaking from experience, there have been many customers that have approached us about CDG participation, but we have had to turn them away.

More importantly, however, is the participation of those within the customer pool that already have a net metered DER on their property as a behind the meter system. Often, High Peaks Solar has installed systems on customer’s property where they are unable to physically fit all of the solar panels that they would require to offset 100% of their annual consumption amount. This deficit, however, is unable to be offset through solar farm participation. Allowing those customers to offset any deficits through CDG participation would allow New York State to achieve its REV goals more quickly.

Please consider our comments when reviewing this proceeding.

Thank you.

Sincerely,

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