



20 July 2012

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

PETITION ON CASE 08-E-1305

To Request an Increase in the Net Metering Limit for Central Hudson Gas & Electric
under Public Service Law §66-j

Dear Secretary Brillling,

My company, Hudson Valley Clean Energy, Inc., sells, designs, and installs solar electric systems. We operate in New York State and Connecticut under the name Hudson Solar. We've been in business since 2002, employ about 40 New Yorkers, and have locations in Rhinebeck and Albany.

Yesterday, Central Hudson Gas & Electric notified renewable energy installers by email that their net metering limit of 12 MW had been surpassed and that net metering was now suspended for new applications. I am writing to request that the Commission increase the limit for Central Hudson to 36 MW. Furthermore, I request that the Commission immediately instruct and permit Central Hudson to continue accepting and processing net metering applications and interconnecting net metered systems in excess of the 12 MW limit to prevent the regional PV market from shutting down.

Public Service Law §66-j Section 2 (b) gives the Commission the authority to increase the net metering limit after January 1st, 2012 if it determines additional net metering is in the public interest. In January, Governor Cuomo announced the NY-Sun Initiative to aggressively expand the state's solar photovoltaic programs. This initiative and the NYSEERDA programs emanating from it will not be successful without net metering being available. To make its own investments to grow the state's PV market, the private sector needs a clear and unambiguous signal that a substantial amount of net metering capacity will be available for several years without question. A smaller increase, for example to 20 MW, would not provide the market with that longer term signal given the aggressive growth goals of the NY-Sun Initiative.

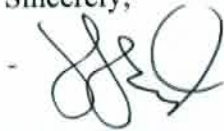
Public Service Law §66-j Section 2 (b) also permits Central Hudson to provide additional net metering without further action required by the Commission. I would hope

that the Commission encourages Central Hudson to do so and quickly. A delay of several months will have serious adverse effects on the regional market. It will cause a rapid drying up of the market as word gets out of the suspension of net metering and customers question the viability of PV. Even if the limit is eventually increased after several months, such disruptions have a lasting effect in consumers' minds.

As a local designer and installer, we not only directly employ skilled New York residents, but subcontract to local electricians, excavators, structural engineers, and electrical inspectors. We contribute directly to towns and villages through building permits and other fees, and purchase electrical and construction material from local suppliers. A slowing down of the market will result in immediate job losses in the Hudson Valley at a time when New York State can least afford it. The impact will be greatest on the many smaller designers and installers who operate exclusively in the Hudson Valley or in Central Hudson's territory. Many of these may not survive a delay of several months to get the net metering limit increased.

I urge you to act expeditiously to ensure that Central Hudson's customers and the private sector are given a clear signal that the net metering of solar electric systems will be permitted well into the future in order to prevent an adverse impact on the regional market and economy.

Sincerely,

A handwritten signature in black ink, appearing to read "J. Irish", written over a horizontal line.

Jeff Irish, PE
President
Hudson Valley Clean Energy, Inc.