

April 5, 2013

VIA EMAIL: secretary@dps.ny.gov

Honorable Jeffrey C. Cohen
Acting Secretary to the Commission
New York State Public Service Commission
Three Empire State Plaza
Albany, NY 12223-1350

**Re: CASE 03-E-0188, NYSERDA PETITION REGARDING UNENCUMBERED
CST FUNDS**

Dear Acting Secretary Cohen:

Enclosed for filing are the comments of the Vote Solar Initiative on the petition regarding unencumbered Customer-Sited Tier funds of the Renewable Portfolio Standard submitted by the New York State Energy Research and Development Authority on January 30, 2013.

Sincerely,

A handwritten signature in black ink that reads "Peter Olmsted". The signature is written in a cursive, flowing style.

Peter Olmsted
East Coast Solar Policy Advocate
The Vote Solar Initiative

BEFORE THE STATE OF NEW YORK
PUBLIC SERVICE COMMISSION

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

Case 03-E-0188

**COMMENTS OF THE VOTE SOLAR INITIATIVE ON
NYSERDA PETITION REGARDING UNENCUMBERED CST FUNDS**

On January 30, 2013 the New York State Energy Research and Development Authority (“NYSERDA”) submitted a petition to the New York State Public Service Commission (“Commission”) regarding its proposal for the allocation of unencumbered 2012 Customer-Sited Tier (“CST”) funds. The Vote Solar Initiative (“Vote Solar”) appreciates the opportunity to file these comments in support of NYSEDA’s petition.

Vote Solar is a non-profit, grassroots organization working to foster economic opportunity and mitigate climate change by making solar a mainstream energy resource across the United States. Since 2002, Vote Solar has engaged at the state, local and federal levels to remove regulatory barriers and implement the key policies needed to bring solar to scale.

The following comments support NYSEDA’s petition to reallocate unencumbered 2012 CST funds in recognition of the need to be responsive to changing market conditions. In particular, Vote Solar concurs with NYSEDA that reallocating the full amount of unencumbered Solar Thermal and Solar PV funds and a portion of unencumbered On-Site Wind and Fuel Cells funds to NYSEDA’s Solar PV program will provide the necessary market stability and support for the ambitious objectives of the NY-Sun Initiative (“NY-Sun”).

Additionally, this reallocation of unencumbered funds to the Solar PV program will help position NY-Sun for future expansion as was announced by the Governor in his 2013 State-of-the-State address. Vote Solar believes that an expanded NY-Sun program is essential for fundamentally transforming New York’s solar market and establishing a robust and sustainable solar industry.

Vote Solar is cognizant of market fluctuations for CST technologies as well as the fact that each of the CST technologies matures differently in the marketplace. We believe that NYSEDA’s reallocation proposal is wholly appropriate at this time and is sensitive to the market dynamics surrounding CST technologies. We appreciate NYSEDA’s ongoing monitoring of program demand and their responsiveness to the market conditions that warrant CST program adjustment. We look forward to working with

NYSERDA to ensure that CST funds are used prudently while also serving the program intent of market transformation.

However, Vote Solar agrees with other commenters that it may be more appropriate for NYSERDA to monitor market conditions and program demand during 2013 before the ultimate determination to reallocate unencumbered Fuel Cell and On-site Wind funds in 2013 to other technology categories. We also suggest that the scheduled 2013 program review would be an appropriate venue for discussing year-to-year program funding objectives and demand as well as program designs that will aid the goal of market transformation.

Vote Solar appreciates the opportunity to submit comments on this matter and is always available to answer questions the Commission may have regarding our written comments.

Respectfully submitted this day, April 5, 2013.



Peter Olmsted
East Coast Solar Policy Advocate
The Vote Solar Initiative
529 West Chestnut Street
Lancaster, PA 17603
peter@votesolar.org