

Jaclyn A. Brillling,
Secretary, Public Service Commission
3 Empire State Plaza
Albany, New York 12223

September 28, 2012

RE: Petition of Hudson Valley Clean Energy, Inc. to Increase Central Hudson Gas & Electric Corporation's Net Energy Metering Limit, Case 12-E-0343 - Request for Public Comments

Comments of UTC Power

Dear Ms. Brillling:

UTC Power, a subsidiary of United Technologies Corporation, submits the following comments on Hudson Valley Clean Energy, Inc.'s petition to increase the net energy metering (NEM) limit for Central Hudson Gas & Electric under Case 12-E-0343.

Respectfully Submitted,



Lisa C. Ward
Government Business Development

STATE OF NEW YORK

PETITION OF CENTRAL HUDSON CLEAN ENERGY, INC. TO INCREASE CENTRAL
HUDSON GAS & ELECTRIC CORPORATION'S NET ENERGY METERING LIMIT

CASE 12-E-0343

COMMENTS OF UTC POWER**I. Introduction**

United Technologies Corporation (UTC) is a Fortune 50 corporation with more than 3200 employees and 43 facilities in the State of New York. UTC Power ("UTCP") is a United Technologies company located in South Windsor, Connecticut, employing 390 people in the development, design, production and service of fuel cell technology for use in stationary, transportation, and space and defense applications.

We offer the following as support for the increase of Central Hudson Gas & Electric (CHG&E) Corporation's net energy metering (NEM) limit. Additionally, we would implore the Public Service Commission to increase the state wide NEM limits to facilitate continued installation and operation of clean energy throughout the State.

II. Comments**A. Support for the increase of the net metering limit**

CHG&E recently announced they would no longer accept net metering customers because their limit of 12 megawatts had been met and exceeded. According to Public Service Law §66-j section 2(b), the Commission has the authority to increase the net metering limit after January 1, 2012 if it is in the best interest of the public. A direct public interest can be linked to the Governor's goals for clean energy installation in the State, which is directly linked to net metering. Therefore, to help avoid an interruption in the successful installation and operation of clean energy in New York State, the Commission should act quickly to either increase the amount of net metering allowed or eliminate the cap completely, not just in CHG&E territory, but Statewide.

Net metering is crucial to the deployment of clean technology in New York. Regardless of whether a technology receives the retail rate or the wholesale rate for the net metered energy, the financial benefits of net metering are essential to growing the clean energy industry. In either the retail or wholesale case, net metering reduces installation costs. Under net metering tariffs, the need for a grid-protection relay to prevent power export to the utility grid is nonexistent. Without net metering, the utility will not allow momentary export of power, thereby introducing the need for a certified relay.

The net metering tariff also allows clean energy generation to be fully utilized once installed. The flow of clean energy back to the grid through the use of net metering keeps clean technologies operating at their maximum output while completely meeting their customer's electricity demands. Without net metering capability, clean technologies may not be used at their full capacity. This can make clean technology projects financially challenging which can reduce overall deployment.

Net metering has a proven track record of helping end users in New York transition from sole reliance on central generation to clean, reliable and efficient distributed generation, such as fuel cell technologies. The program helps to support the State's clean energy, distributed generation and air quality targets by incenting the deployment of clean technologies, especially those supported by NYSERDA funding programs. The net energy metering program also helps cultivate New York's clean energy economy and job growth by promoting the use of distributed generation technologies.

III. Conclusion

Thank you for the opportunity to comment on Central Hudson Clean Energy, Inc.'s Petition to increase Central Hudson Gas & Electric (CHG&E) Corporation's net energy metering (NEM) limit, Case 12-E-0343. We would be pleased to provide you with additional information or clarification as needed.

Respectfully Submitted:



By: _____

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