VIA ELECTRONIC FILING

October 22, 2018

Hon. Kathleen Burgess
Secretary to the Commission
New York State Public Service Commission
Empire State Plaza
Agency Building 3 Albany, NY 12223-1350

Re: Case #15-E-0751 – Value of Distributed Energy Resources

Dear Secretary Burgess:

New York State needs a solar valuation policy that will support a robust array of solar projects in different utility territories and ensure that low and moderate income New Yorkers are able to access renewable energy. Right now, the Value of Distributed Energy Resources (VDER) policy is making community solar inaccessible to all but a small number of communities, and it is undercutting the Governor’s promise to make solar power accessible “regardless of income or zip code.” As organizations that care about both equity and renewable energy, we encourage you to extend the VDER Market Transition Credit (MTC) to all customers of community renewable energy projects, to raise the MTC values to levels that makes it possible for community renewable energy developers to finance and build projects, and to provide each community project the option to choose between VDER or the simpler net metering valuation.

Respectfully,

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