

Dear Chairman Brown,

Vanguard Energy is the green energy arm and a wholly owned subsidiary of Communications Specialists Inc, which has been in operation in New York for nearly 20 years. We work hard to promote clean energy, energy efficiency, a healthy environment and a strong economy for New York State. Vanguard Energy supports net metering for clean, on site power generation using renewable resources. Our primary market is Central Hudson's service territory. Being located in central Dutchess County, this net metering halt could be hazardous to our company's ability to succeed in a very competitive New York State.

We are submitting these comments to show our support of the petition filed by Hudson Valley Clean Energy, which requests that the Commission act expeditiously to order Central Hudson to raise the cap on the amount of net metered systems allowed to interconnect to its electric grid. We also request that the Commission act to ensure continuity for customers and installers in every utility territory and to prevent the halting of interconnections in the future through periodic reviews and increases in utility caps on net metered systems. This is especially important given the State's recent adoption of a program (NY-Sun) to increase the amount of solar energy systems installed in New York through 2016.

Central Hudson recently notified renewable energy system installers and customers in its service territory that it would no longer provide net metering since it has reached its cap of 12 MW (1% of its 2005 demand). If Central Hudson is to cease net metering it will have an immediate negative impact on our business in New York and our ability to sell solar systems. Our business relies on a continuous stream of projects, and a market disruption of this extent will be very difficult to overcome.

As a small business installing solar in New York, net metering is critical to the continued success of our business. Net metering is a simple, easily administered method of encouraging investment in solar technologies. Without net metering, our ability to sell solar systems is severely reduced.

Central Hudson has the discretion to continue offering net metering past the 12 MW cap. Additionally, Public Service Law authorizes the Commission to increase the ceiling on the total megawatts eligible for net metering from cumulative installations if the Commission determines that additional net metering is in the public interest. Vanguard Energy urges the Commission to act expeditiously to ensure continued availability of net metering within Central Hudson's territory. In addition, net metering caps for each utility should be raised significantly enough to cover the expected installations under the NY-Sun program. Continued increases in the use of solar generation benefits the public at large, helps consumers lower their electric bills and allows our business to continue to grow and add jobs.

Respectfully submitted,

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