



**BEFORE THE NEW YORK
PUBLIC SERVICE COMMISSION**

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

Case 03-E-1088

**Comments of Pace Energy and Climate Center Regarding
NYSERDA's NY-Sun Petition**

April 16, 2012

Introduction

The Pace Energy and Climate Center (Pace) and Natural Resources Defense Council (NRDC) appreciate this opportunity to comment on the NYSERDA proposal for “NY-Sun”.

Pace is a non-profit organization with a twenty-five year track record of addressing environmental interests in the production and use of energy. Within this focus, we promote energy efficiency, renewable energy and clean distributed generation technologies—options that are cost effective means to reduce the negative climate, air, water, land and human health impacts from current patterns of electricity production and consumption. Using research, education, and negotiation, we work with individuals, institutions and governments involved in energy decision making. We participate in regulatory proceedings, engage policymakers, and work with a diverse community of business, labor and environmental stakeholders to support the advancement of clean energy technologies.

With over 98,000 members and e-activists residing in the State of New York, the Natural Resources Defense Council (NRDC) is one of the nation’s largest and most respected groups

protecting and defending our environment, and it has been working on energy policy in New York for forty years. In addressing the most pressing environmental issue of our time – global climate change – we seek to implement rapidly scalable clean energy policy solutions that do no or minimal harm to our existing natural resources – air, water, soil, and protecting wild land and wildlife.

As we understand the matter, NYSERDA’s four-year proposal in this petition is to transfer Main Tier funds to solar programs for the first two years, and leave the source of funds for the remaining two years of the solar program to be decided in 2013. Although we are principally opposed to the transfer of funds from the Main Tier to the CST, we recognize that as a practical matter, the proposed reallocation does not appear to have an adverse impact on the Main Tier given current financial issues for Main Tier resources and the timeline for development of those resources.

While we believe that the NY-Sun proposal is a worthy start, we urge the Commission, NYSERDA, Governor Cuomo and all other relevant policymakers to establish solar development goals that go further—demonstrating the long-term commitment, regulatory certainty and scale necessary to ensure New York State is truly ‘open for business’. Doing so will benefit New York’s citizens and businesses, enabling them to tap this clean and renewable source of energy. As demonstrated by states around the country, the tenets of certainty, scale and longevity are needed to attract the scale of investment that will drive the numerous benefits that solar generates.

Conclusion

We commend Governor Cuomo and NYSERDA for recognizing the shortcomings of New York’s existing solar policies, and for advancing the NY-Sun petition to begin addressing those shortcomings. As mentioned above, this is a positive first step, but much more needs to be done to attract a long-term, robust solar energy industry to New York.

Pace and NRDC appreciate the opportunity to submit these comments. We look forward to continued participation in RPS-related proceedings at the Commission, as well as working with the State to ensure New York becomes a solar leader.

Respectfully submitted on this 16th day of April, 2012.



Jackson Morris

Director of Strategic Engagement

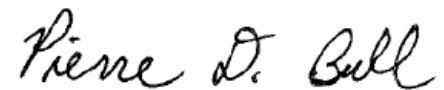
Pace Energy and Climate Center

744 Broadway

Albany, NY 12207

914.539.1985

jmorris@law.pace.edu



Pierre D. Bull

Policy Analyst

NRDC

40 W. 20th St, 11th Fl.

New York, NY 10011

212.727.2700

pbull@nrdc.org