
ALLIANCE FOR CLEAN ENERGY NEW YORK • CITIZENS CAMPAIGN FOR THE ENVIRONMENT • ENVIRONMENTAL ADVOCATES OF NEW YORK • NATURAL RESOURCES DEFENSE COUNCIL • NEW YORK FARM BUREAU • NEW YORK INTERFAITH POWER & LIGHT • NEW YORK LEAGUE OF CONSERVATION VOTERS • NEW YORK SOLAR ENERGY INDUSTRIES ASSOCIATION • PACE ENERGY AND CLIMATE CENTER • RENEWABLE ENERGY LONG ISLAND • THE SOLAR ALLIANCE • THE VOTE SOLAR INITIATIVE

January 8, 2010

Commissioner Garry A. Brown, Chairman
Commissioner Patricia L. Acampora
Commissioner Robert E. Curry, Jr.
Commissioner Maureen F. Harris
Commissioner James L. Larocca
New York State Public Service Commission
Empire State Plaza
Agency Building 3
Albany, NY 12223-1350

Dear Commissioners,

We were pleased to see the Commission act in December of 2009 to ensure the main tier of the State's Renewable Portfolio Standard (RPS) can continue without a gap in funding; however, the customer-sited tier (CST) was left in limbo with one program (solar) operating on a very limited budget, and the others (wind, digesters and fuel cells) shut down for lack of funds.

As organizations committed to the development of a robust clean energy economy in New York State, we are writing to express our concern over the current lack of continued funding for the customer-sited tier technologies of the RPS program.

We strongly urge the Commission to take immediate action to authorize continued operation of all CST programs and to indicate long-term support for these programs commensurate with the timeline for the overall RPS.

While we understand that the Commission has a number of issues and possible program changes, many of which we support, to explore before a final decision on the CST programs in general, this disruption and uncertainty is having an immediate negative impact on many small businesses and customers. The gap in program funding threatens the ability to reach the State's long-term goals for the clean energy sector (the Governor's "45 by 15" initiative), and therefore achievement of our environmental goals as well, including Executive Order 24 and the activities of New York's Climate Action Council.

We believe the Commission can take interim measures at the January session to:

- Immediately authorize “bridge” funding to ensure continuation of the programs while the Commission makes further decisions on longer term funding and possible program changes; and
- Publicly state its intention to continue the programs through 2015, with funding at least commensurate with previous levels, to instill confidence in the program and to allow businesses to make investments in employees and equipment and to market their services.

The CST is a critical component of the RPS and the State’s overarching goals of combating climate change, increasing long-term energy security and price stability, improving air quality, and growing our clean energy economy. The current lack of program continuity is not only a source of frustration to those participating in the program, but also to businesses, farms, schools, nonprofits, and homeowners wishing to take advantage of the opportunity to invest in green technology.

We appreciate the opportunity to bring these concerns to the attention of the Commission.

Sincerely,

Carol E. Murphy, Executive Director
Alliance for Clean Energy New York, Inc.

Marcia Bystryn, Executive Director
New York League of Conservation Voters

Adrienne Esposito, Executive Director
Citizens Campaign for the Environment

Ron Kamen, President
New York Solar Energy Industries Association

David Gahl, Policy Director
Environmental Advocates of New York

James Van Nostrand, Executive Director
Pace Energy and Climate Center

Pierre Bull, Policy Analyst
Natural Resources Defense Council

Gordian Raacke, Executive Director
Renewable Energy Long Island

Jeff Williams, Deputy Director
Division of Public Policy
New York Farm Bureau

Carrie Cullen Hitt, President
The Solar Alliance

Nicola Coddington, Executive Director
New York Interfaith Power & Light

Shaun Chapman, East Coast Campaigns
Director
The Vote Solar Initiative

CC: Francis J. Murray, Jr., President and CEO, NYSERDA
Thomas Congdon, Deputy Secretary for Energy, NYS Executive Chamber