



NYSERDA

ANDREW M. CUOMO
Governor

RICHARD L. KAUFFMAN
Chair

ALICIA BARTON
President and CEO

January 9, 2018

ELECTRONIC FILING

Hon. Kathleen H. Burgess
Secretary to the Commission
New York State Public Service Commission
Three Empire State Plaza
Albany, New York 12223-1350

Re: Case 15-E-0302 Proceeding on Motion of the Commission to Implement a Large-Scale Renewable Program and a Clean Energy Standard

Dear Secretary Burgess:

On December 18, 2017 the New York State Energy Research and Development Authority (NYSERDA) filed its comments in response to the petition filed by Astral Energy, LLC (Astral) on September 29, 2017 in the above-referenced proceeding. It has since come to our attention that the narrative description of the calculation that would be used to determine the fixed-dollar per MWh zero-emission credit (ZEC) payments was incorrect.

NYSERDA apologizes for the confusion but hereby revises its comments with respect to the calculation by deleting the following paragraph, from page 2:

The CES Order established a process to determine the ZEC price for tranche one and each succeeding tranche and the maximum number of ZECs to be purchased by NYSERDA; the amount of required collections is the multiplicative product of the two. Because each LSE's obligation is based on the percentage of the statewide load that the LSE serves, to implement the alternative approach, NYSERDA and Staff would need to determine the appropriate estimate of statewide electrical load forecast for each year to calculate the dollar per MWh rate. Using the ratio of the maximum number of ZEC's to be purchased by NYSERDA divided by the estimate of statewide electrical load would yield the ZEC Volumetric Charge for a given year, a fixed dollar per MWh, to be applied to each MWh that is provided by LSEs to retail customers. The LSE's ongoing obligation would consist of the dollars per MWh rate multiplied by the number of MWh purchased.

And, inserting the following paragraph in its place:

The CES Order established a process to determine the ZEC price for tranche one and each succeeding tranche and the maximum number of ZECs to be purchased by NYSERDA; the amount of required

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collections is the multiplicative product of the two.¹ Because each LSE's obligation is based on the percentage of the statewide load that the LSE serves, to implement the alternative approach, NYSERDA and Staff would need to determine the appropriate estimate of statewide electrical load forecast for each year to calculate the dollar per MWh rate. Using the amount of required collections divided by the estimate of statewide electrical load would yield the charge for a given year, a fixed dollar per MWh, to be applied to each MWh that is provided by LSEs to retail customers. The LSE's ongoing obligation would consist of the dollars per MWh rate multiplied by the number of MWh purchased.

Again, our apologies for the confusion. If you have any questions regarding this filing, please contact me at 518.862.1090, ext. 3366.

Sincerely,

A handwritten signature in black ink, appearing to read "Peter Keane". The signature is fluid and cursive, with the first name "Peter" and last name "Keane" clearly distinguishable.

Peter Keane
Deputy General Counsel
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Attachment.

¹ Case 15-E-0302 – Proceeding on Motion of Commission to Implement a Large-Scale Renewable Program and Clean Energy Standard, *Order Adopting a Clean Energy Standard* (“CES Order”) Effective August 1, 2017, p. 129-141.