



SAVING THE LAND THAT MATTERS MOST

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October 3, 2012

**VIA E-MAIL**

Honorable Jaclyn A. Brillling  
Secretary  
New York State Public Service Commission  
3 Empire State Plaza  
Albany, NY 12223-1350  
secretary@dps.ny.gov

**RE: Case 12-E-0343**

Dear Hon. Brillling:

Scenic Hudson submits these comments in support of the petition filed by Hudson Valley Clean Energy requesting that the Commission order Central Hudson Gas & Electric to increase the Net Metering Limit under Public Service Law § 66-j. We further request that the PSC conduct a comprehensive review of the state's net-metering policy as a whole, and increase the Net Metering limit.

Scenic Hudson is a not-for-profit organization working to protect and restore the Hudson River as an irreplaceable national treasure and a vital resource for residents and visitors. An advocate for the valley since 1963, today we are the largest environmental group focused on the Hudson River Valley. Scenic Hudson combines land conservation, citizen-based advocacy and sophisticated planning tools to create environmentally healthy communities, champion smart economic growth, open up riverfronts to the public and preserve the valley's inspiring beauty and natural resources.

The Public Service Law authorizes the Commission to increase the ceiling on total megawatts eligible for net metering from cumulative installations if the commission determines that additional net metering is in the public interest. The installation of solar energy systems is an important part of the generation of clean and renewable power sources. Net metering provides a strong incentive to customers to install solar energy systems, which support local businesses and reduce stress on the grid at times of peak demand without contributing to the erosion of air quality.

Development of on-site renewable power is consistent with the State's energy policy, including the customer-sited tier of the Renewable Portfolio Standard (RPS), and the recent adoption of the NY-Sun program to increase the amount of solar energy systems installed in New York through 2016. Increased use of on-site renewable power is also consistent with state climate policy and New York's goal to reduce climate pollution 80% from 1990 levels by the year 2050.

Increasing the state's aggregate capacity limit would send a signal to the solar industry, electric utilities and future solar customers that the net metering program is not going anywhere. A halt to net metering



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will have a dramatic impact on the willingness of customers to install solar energy systems and, as a consequence, on the solar energy installers and their employees.

If the State is to continue to move toward the goals outlined in New York's energy policy and lead in solar technology jobs and innovation, the Commission must raise the net metering limit and conduct a review of the net-metering policy as a whole.

Respectfully submitted,

/s/ Hayley Carlock/  
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Scenic Hudson, Inc.