

July 27, 2012

Jaclyn Brilling, Secretary
Public Service Commission
Three Empire State Plaza
Albany, NY 12223-1350



RE: Case 08-E-1305, Petition to Request an Increase in the Net Metering Limit for Central Hudson Gas & Electric under Public Service Law §66-j

COMMENTS OF THE VOTE SOLAR INITIATIVE

Dear Secretary Brilling,

The Vote Solar Initiative (Vote Solar) respectfully submits the following comments in strong support of the petition submitted by Jeff Irish, President of Hudson Valley Clean Energy, Inc. On July 20, 2012, Mr. Irish submitted a petition to the Public Service Commission (Commission) requesting an increase in the net metering limit for Central Hudson Gas & Electric (Central Hudson).

Vote Solar is a non-profit 501(c)(3), grassroots organization with active members throughout New York and the U.S. Vote Solar's mission is to promote a healthy environment and foster economic development by bringing solar energy into the mainstream. Since 2002, Vote Solar has been helping to address market barriers and enable effective policies that will spur sustainable growth of solar markets, drive down costs and broaden participation in the solar energy economy. Having worked in over 20 states as an active stakeholder, Vote Solar has a broad understanding of the policies and programs that support solar market development.

Having focused over the past several years in helping make New York a solar leader, Vote Solar has a particular interest in ensuring that the foundations of the state's solar market continue to support further growth. New York's net energy metering law is one such foundation that is imperative to the growth of the local market and creation of clean energy opportunities. Now in place in 43 states, net metering has enabled electricity customers across the country and in New York to generate their own electricity cleanly and efficiently. Without exception, significant deployment of clean, customer-sited

distributed generation occurs only in states with strong, transparent and stable net metering policies in place.

As described in the petition of Mr. Irish, we understand that Central Hudson has surpassed their net metering limit of 12 megawatts and that they have suspended their net metering program for new applications. As Mr. Irish rightly identifies, suspension of Central Hudson's net metering program will have deleterious effects on the solar market and local companies such as his. Without increasing the net metering limit, future opportunity for customer-sited clean energy will cease to exist for Central Hudson electricity customers and local solar businesses will suffer without addition demand.

A suspended net metering program will also shake the confidence of the solar industry and New Yorkers looking to invest in solar. With a nascent solar industry that desires a long-term market signal to invest and plan for growth, net metering program suspensions will undermine the public policy goals of expanding the state's solar economy both in Central Hudson's service territory and around the state.

Raising Central Hudson's net metering limit is clearly in the public interest considering customer-sited generation helps reduce the need for expensive peak generation, reduce electricity losses due to transmission and distribution, and lessens the strain on utility distribution systems. Distributed energy generation such as solar provide customers with an option for stable-priced electricity while also contributing to local economic activity and the improvement of air quality in New York state.

Recognizing these benefits, the state has prioritized the increased deployment of solar energy through NYSERDA programs and, more recently, through the adoption of Governor Cuomo's NY-Sun Initiative. With clear objectives to stimulate the state's solar market over the next several years, these programs will build momentum towards a sustainable solar energy economy in New York. It is therefore imperative to ensure that New York's suite of clean energy policies and program work in concert. It is in this respect that net metering serves as a vital component of the state's clean energy goals.

We therefore strongly support Mr. Irish's petition to increase Central Hudson's net metering limit, and urge the Commission to use their authority under Public Service Law §66-j to increase this limit as soon as possible. We further urge the Commission to

increase this limit to a level that will enable steady and sustainable deployment of clean energy resources.

In addition to addressing Central Hudson's net metering limit, we encourage the Commission to consider net metering limits for each utility in the context of expected solar development under the NY-Sun Initiative. With a goal of ensuring balanced geographic distribution of solar development throughout the state, it is essential to maintain active net metering programs to fulfill this purpose.

Respectfully submitted,

Peter Olmsted

/s/ Peter Olmsted

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