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By Electronic Delivery

June 3, 2013

Honorable Jeffrey Cohen
Acting Secretary to the Commission
New York State Public Service Commission
Agency Building 3, Empire State Plaza
Albany, New York 12223-1350

RE: Case 03-E-0188: Proceeding on Motion of the Commission Regarding a Retail Renewable Portfolio Standard

Dear Acting Secretary Cohen,

Enclosed for filing are the comments of Alliance for Clean Energy New York (ACE NY) on the petition for reallocation of NY-Sun program funds submitted by the New York State Energy Research and Development Authority (NYSERDA).

Sincerely,

Valerie Strauss, Interim Executive Director
Alliance for Clean Energy New York, Inc.

Encl.

**COMMENTS OF ALLIANCE FOR CLEAN ENERGY NEW YORK
ON THE NYSERDA PETITION REGARDING
NY-SUN PV FUNDING**

I. Introduction

The Alliance for Clean Energy New York (ACE NY) respectfully submits the following comments in the Renewable Portfolio Standard (RPS) program proceeding. ACE NY is a nonprofit organization whose mission is to promote the use of clean electricity technologies and energy efficiency in New York State in order to increase energy diversity and security, boost economic development, improve public health, and reduce air pollution. Members of ACE NY include nonprofit environmental, public health and consumer advocacy organizations, educational institutions, and private companies that develop, produce and sell clean energy and clean energy technologies, as well as energy efficiency services, in New York.

These comments are provided to offer support for the petition submitted by NYSERDA to the Commission on April 5, 2013 requesting limited additional authority to transfer NY-Sun funds among the Competitive PV Program Zone Groups in order to allow the program to respond to marketplace demand and effectively support Governor Cuomo's NY-Sun goal.

II. The State Should Support Existing Market Demand At This Time

NYSERDA has proposed reallocating funds among individual Zone Groups based on an initial review of the most recently received round of proposals, which shows that unless NYSERDA is granted discretion to transfer funding from downstate Zones I-J, a large number of currently pending proposals in Zone Groups A-F and G-H will go unfunded, while a large balance of uncommitted funds will remain dedicated to Zones I-J. The overall goals of NY-Sun

will not be met without maintaining a stable market across the entire state. We support NYSERDA's request and believe it should be afforded the flexibility it needs to respond to fluctuations in the marketplace and realign Zone Group funds accordingly at this time.

III. NYSERDA Should Explore Decrease in Downstate Demand and Address Barriers

NYSERDA posits that decreased market demand in Zone Groups I-J is due in part to the widespread damage incurred during Superstorm Sandy, which may be causing consumers to forego participation in NY-Sun in lieu of more urgent infrastructure needs relating to storm cleanup and repair. However, we believe NYSERDA should make a concerted effort to substantiate this theory and determine whether or not any additional factors may be influencing the market in these specific zones, and explore ways to support returning Zone Groups I-J to their previous levels of demand.

IV. Conclusion

We support NYSERDA's petition to transfer funds among the Competitive PV Program Zone Groups this year. Doing so will ensure continued consumer and installer confidence in this program and facilitate market stability. NYSERDA should also seek to determine the reasons for decreased demand in Zones I-J and address any barriers that may be preventing the program from achieving robust levels of participation in these zones in the future.

Respectfully Submitted,

A handwritten signature in black ink, appearing to read "Valerie Strauss". The signature is fluid and cursive, with a long horizontal stroke extending to the right.

Valerie Strauss, Interim Executive Director
Alliance for Clean Energy New York, Inc.
Albany, NY
June 3, 2013