



VIA ELECTRONIC MAIL

March 18, 2010

Honorable Jaclyn A. Brillig
Secretary to the Commission
New York State Public Service Commission
Empire State Plaza
Agency Building 3
Albany, New York 12223-1350

Re: Petition of NYSEIA for Solar Thermal Technology to be RPS Eligible, SAPA Notice 03E1088SP23

Dear Secretary Brillig,

The Alliance for Clean Energy New York (ACE NY) fully supports the petition of the New York Solar Energy Industry Association requesting that solar thermal technologies be eligible under the state's Renewable Portfolio Standard (RPS). ACE NY is a nonprofit organization whose mission is to promote the use of clean, renewable 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 renewable energy and renewable energy technologies as well as energy efficiency services in New York.

Solar thermal technology was not included in the original list of RPS technologies, presumably because it does not produce electricity. It also was excluded from the Energy Efficiency Portfolio Standard (EEPS), where ACE NY believes it would have been entirely appropriate for inclusion. ACE NY supports its inclusion in the RPS however, and believes it should be considered equal with the other technologies in the Customer-Sited Tier of the RPS since it can displace the need for "brown" power, just as the others do. Funding to support this newly eligible technology should be in addition to adequate funding for the originally eligible RPS technologies given that solar thermal is not clearly a substitute for those technologies which produce electric power for on-site use and, in fact, can be a useful technology to install in conjunction with the other eligible technologies.

Solar thermal installations are efficient and non-polluting and have the potential to offset a significant amount of fossil fuel use in New York State. We encourage the Commission to act on this petition immediately and in conjunction with approval of broad Customer-Sited Tier program funding, such that it can be incorporated into funding allocations and program management.

Respectfully,

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

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