



**Doosan Fuel Cell America, Inc.**  
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State of New York Public Service Commission

In the Matter of the Implementation of a Large-Scale Renewable Program

Case 15-E-0302

Doosan Fuel Cell America, Inc.

August 12, 2015

Via Electronic Mail

The Honorable Kathleen H. Burgess  
Secretary  
New York State Public Service Commission  
Three Empire State Plaza  
Albany, New York 12223-1350

Dear Secretary Burgess:

Doosan Fuel Cell America, Inc. appreciates the opportunity to provide comments on the Implementation of a Large-Scale Renewable Program in the New York Public Service Commission's Case 15-E-0302. Doosan strongly supports the comments filed by the Alliance for Clean Energy New (ACE-NY) and other clean energy industry association in this proceeding in response to the Notice Instituting Proceeding, Soliciting Comments and Providing for Technical Conference, issued June 1, 2015.

Doosan Fuel Cell America, Inc. is a global leader in providing clean, continuous-duty, cost-competitive stationary fuel cell energy systems. Our combined heat and power (CHP) PureCell<sup>®</sup> systems operate 24/7 with high efficiency and ultra-low emissions, allowing our customers to generate their own electricity and heat on-site while reducing their utility expenses and environmental emissions. With over 12 million fleet operating hours, PureCell<sup>®</sup> phosphoric acid fuel cell (PAFC) systems have demonstrated unparalleled durability and reliability.

Doosan Fuel Cell America, Inc. is a new fuel cell company founded on the strength of the people and technology developed at United Technologies over the past fifty years. In July 2014, Doosan Corporation acquired the assets of ClearEdge Power (formerly UTC Power). We are building on the value of the organization and aspire to be the technology and market leader in the fuel cell industry. Our headquarters are in South Windsor, CT at the site of our world-class fuel cell R&D and manufacturing facilities.

The State of New York is one of the most important markets for the emerging fuel cell sector, and fuel cells are contributing greatly to New York's goals of reducing greenhouse gas emissions, reducing peak load, and improving the reliability of the electric utility system. Doosan fuel cells operate at fourteen customer sites across New York State, supplying 9.2 MW of clean and secure power to a diverse set of customers in a variety of industries.



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Doosan is concerned that New York's Renewable Energy Portfolio Standard (RPS) Main Tier is expiring. With this new proceeding, New York State has a tremendous opportunity to build on and improve the RPS, and to fully develop its clean energy resources. Decisions made now will have long-lasting economic and environmental impacts. To ensure the success of the State's new large-scale renewables policy, we urge the Commission to heed the recommendations put forth by ACE-NY. New York State has been successful in bringing fuel cells and other clean, continuous, distributed generation to energy consumers and therefore we fully support the continuation of fuel cells as a renewable technology in the Main Tier program.

Clean energy technologies like wind, solar and fuel cells are already working to diversify New York's energy portfolio and stabilize energy prices, creating new jobs, and supporting the tax base of local communities. A recommitment to promoting grid-tied renewable energy, especially one that is aggressive and long-term in scope, will send an important signal to our industry that New York is still ripe for investment and ready for business.

As discussed in more detail by ACE-NY, we believe the best design for a successful LSR program will include:

- A target-driven approach that requires utilities to procure a specified percentage of renewable energy by specified dates, to ensure an investment level designed to achieve the new 50% by 2030 renewable energy goal;
- A utility obligation to enter into long-term, bundled power purchase agreements;
- Support for diverse technologies, in order to realize the technical potential – and obtain the economic and environmental benefits – of the full range of clean energy technologies;
- Consideration of both new and existing LSR, and
- Incorporation of Long Island into the program's geographic scope.

Further, while we wholeheartedly support the recommendation for a long-term deployment strategy, we call on the State to make a stronger funding commitment than is embodied in the Options Paper thus far.

Doosan would additionally make a strong case that fuel cell technology be explicitly recognized to maintain its status as a renewable energy technology in New York State's long-term RPS program. By operating with no combustion, fuel cells have negligible emissions of criteria air-pollutants such as NO<sub>x</sub>, SO<sub>x</sub>, CO, VOCs, and particulate matter. Also by operating with high electrical and overall CHP efficiencies, and with high reliability and capacity factor, fuel cells can contribute a significant reduction in GHG emissions for the State. In fact, a 10 MW fuel cell installation can result in approximately 4 times more annual GHG savings than a 10 MW installation of solar photovoltaic systems, while occupying up to 300 times less land area.

We appreciate the opportunity to weigh in on this critical dialogue and look forward to working with the Commission and other stakeholders as this proceeding continues. Our company remains interested in the New York market for renewable energy and we look forward to increasing our presence in New York within the framework of a new strong, long-term, and innovative large-scale renewable program.



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Respectfully submitted:

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