

Hon. Kathleen H. Burgess  
Secretary to the Commission  
New York State Public Service Commission  
Three Empire State Plaza  
Albany, New York 12223-1350

Re: Case 19-M-0463 – Consolidated Billing for Distributed Energy Resources

December 2, 2019

Dear Secretary Burgess,

We would like to register our concern at the content and potentially damaging impact of the supplemental comments submitted by the Joint Utilities on September 13, 2019 in Case #19-M-0463 concerning excluding Community Choice Aggregation from the Consolidated Billing for Distributed Energy Resources.

As stressed by members of this group previously, enabling community-scale (“opt-out”) participation in Community Distributed Generation (CDG) projects is crucial for the achievement of the nation-leading clean energy mandates established in New York’s Climate Leadership and Community Protection Act of 2019 (CLCPA); namely the environmentally critical standards of reaching 70% renewable electricity supply by 2030 and 6,000 MW of distributed solar by 2025.

Today, customers must sign up one at a time for solar, creating a slow and often complex sales process, and market growth is therefore critically delayed. Indeed, the NYS CDG program was launched over three years ago and as yet only 102 MW have been completed.[1]

Therefore, meeting NY renewables objectives, without the instrument of consolidated billing, through opt-out CCA programs will be impossible. Only this method allows entire municipalities to sign up and support the new build of solar farms through one negotiated contract on an opt-out basis for their communities. This critical enabler must remain a part of Case 19-M-0463, or it will undermine one of the key purposes of the bill – to enable New York State to meet its own stated standards.

Dozens of New York State municipalities, several of which are actively pursuing community-scale partnerships with CDG projects, are working to create Community Choice Aggregation (CCA) programs in which CDG subscription with guaranteed monthly savings is integrated with the default offering to residents. Consolidated billing for CDG is an essential mechanism to streamline this integration and removing this opportunity would undermine the purpose of these public initiatives.

It is clearly stated in the CCA rulemaking issued by the Commission, that CCA is intended to serve as a municipal authority that extends well beyond simple electricity commodity procurement; as a programmatic venue for several integrated Distributed Energy Resources offerings and partnerships with local CDG projects. To restrict this now, would undermine the market design established by the Commission itself, and punish the state-leading communities that have already operationalized clean energy CCA programs. These communities have plans to expand the breadth of their programs as opportunities to expand and enhance consumer value through CDG and other community energy partnerships.

As evidenced by the many public comments in support of an opt-out CCA+CDG model, this sort of scale is precisely why the prospect of consolidated billing is so potentially powerful.

We therefore request that the Commission guards the original intent of their own market design, namely to enable the deployment of renewables and the empowerment of local communities through CCA programs. Meeting our renewables targets will not be possible without a significant increase in uptake – impossible without the integration of Unified Billing and Community Choice Aggregation.

Sincerely,  
Alliance for CCA and Consolidated Billing

Mike Gordon, CEO, Joule Community Power, a division of Joule Assets  
Jessica Azulay, Executive Director, Alliance for a Green Economy  
350NYC.org  
Mark Dunlea Chair, Green Education and Legal Fund



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[1] According to NYSERDA data updated November 15, 2019. Full dataset can be found at:  
<https://data.ny.gov/Energy-Environment/Solar-Electric-Programs-Reported-by-NYSERDA-Beginn/3x8r-34rs>