



NY GEOTHERMAL ENERGY ORGANIZATION

June 9, 2020

John B. Rhodes, Chair, NYS Public Service Commission
Empire State Plaza
Agency Building 3
Albany, NY 12223-1350

Re: Geothermal for Low and Moderate income and Small Commercial & Industrial Ratepayers

Dear Chair Rhodes and Commissioners:

The New York Geothermal Energy Organization (NY-GEO) is writing to request the Commission to reconsider National Grid's KEDNY and KEDLI request for a REV 2.0 project to install and own geothermal ground loops for LMI and C&I customers as presented in case 19-G-0309/10.

With the Williams pipeline off the table and the Commission needing to address the heating needs of National Grid's customers, this REV 2.0 project is timely and can be part of the long-term solution to National Grid's downstate gas capacity issues.

Small C&I customers and LMI customers are two currently underserved markets for heat pumps, and allowing third party ownership of ground loops will help increase adoption and lower first costs to these customers. Additionally, third party utility ownership of ground loops provides a utility endorsement of the technology, removing barriers and risks typically associated with geothermal systems.

Removing the ground loop up-front cost of the installation will bring the first costs of geothermal more in line with other heating and cooling technologies and will help accelerate their adoption.

This limited program would allow up to 900 participants to convert to geothermal, doubling the size of the local LMI and C&I markets overnight, and would do so in a cost-effective manner – approximately \$440 per year, for the fixed monthly charge.

NY-GEO looks forward to being part of the conversations about how to best implement this program, providing technical resources to design energy efficient ground loops, and helping these two underserved markets convert to geothermal heating and cooling systems.

Sincerely,

Bill Nowak
Executive Director, NY-GEO
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The New York Geothermal Energy Organization (NY-GEO) is a non-profit trade association representing geothermal heat pump (GHP) installers, manufacturers, distributors, drillers, consultants and industry stakeholders from throughout New York State and beyond.

Cc: Commissioner Diane X. Burman
Commissioner James S. Alesi
Commissioner Tracey A. Edwards
Commissioner John B. Howard
Peggie Neville, Deputy Director of Clean Energy, NYS Department of Public Service