September 21, 2015

TO:
Honorable Kathleen H. Burgess
Secretary to the Commission
New York State Public Service Commission
Empire State Plaza, Agency Building 3
Albany, New York 12223-1350
secretary@dps.ny.gov

FROM:
Richard Umoff
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State Affairs
Solar Energy Industries Association
Phone: 202-556-2877
Email: rumoff@seia.org

RE: Case 15-E-0082 – Proceeding on Motion of the Commission as to the Policies, Requirements and Conditions for Implementing a Community Net Metering Program

Dear Secretary Burgess,

Please find the Solar Energy Industries Association's Comments in support of the Joint Utilities' recommended reconfiguration of the allocation of excess credits in their Petition for Reconsideration.

Sincerely,
/s/ Richard Umoff
Richard Umoff
Counsel and Regulatory Affairs Manager
State Affairs
Solar Energy Industries Association
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STATE OF NEW YORK
PUBLIC SERVICE COMMISSION

RE: **CASES 15-E-0082**

Dear Secretary Burgess,

The Solar Energy Industries Association (SEIA) respectfully submits these comments in regards to the Joint Utilities' (JU) Petition for Reconsideration in Case 15-E-0082 related to the Community Net Metering Program (also referred to as the Community Distributed Generation (CDG) Program).[1]

Established in 1974, SEIA is the national trade association of the United States solar energy industry and is a broad-based voice of the solar industry in New York. Through advocacy and education, SEIA and its 1,000 member companies are building a strong solar industry to power America. There are 70 SEIA member companies in operation in New York working in all market segments – residential, commercial, and utility-scale. SEIA member companies provide solar panels and equipment, financing, and other services to a large portion of New York solar projects. In addition, SEIA is a party in the above referenced proceeding.

1. SEIA Supports the Program Design Recommendation Put Forth in the JU Petition for Reconsideration Regarding Allocation of Excess Credits

On August 17, 2015, the JU filed a Petition for Clarification and Reconsideration, which the Commission determined to be a Petition for Reconsideration in the Community Net Metering docket (the Petition),[2] recommending reconfiguration of how excess credits between sponsors and subscribers are distributed.

The JU assert an improved process for distribution of excess credits to more efficiently and effectively implement the CDG Program.[3] The JU suggest that all credits on the CDG Sponsor's

[1] The comments herein represent the views of SEIA and not any individual member company.
[2] Case 15-E-0082
[3] Id. at 3

account be allocated to subscribers on a percentage basis each month, according to percentages set forth by the CDG Sponsor. Further, excess credits held in reserve on the CDG Sponsor's account should be carried forward for accounts not fully subscribed in a manner similar to remote net metering credits until 100 percent allocation is reached. Additionally, the JU recommend credits that have been allotted to subscriber accounts remain on those accounts until used, and not returned to the corresponding CDG Sponsor account at the end of the year. SEIA takes this final recommendation to mean that, once allotted to subscriber accounts, credits will remain on those accounts in perpetuity. SEIA agrees with this approach.

SEIA supports the JU's recommendations for distribution of excess credits and urges the Commission to implement the CDG program on schedule to ensure the program's success.

Respectfully Submitted,

/s/ Richard Umoff
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