
STATE OF NEW YORK
PUBLIC SERVICE COMMISSION

Petition of Sustainable Westchester for
Expedited Approval for the
Implementation of a Pilot Community
Choice Aggregation Program within the
County of Westchester

Case 14-M-0564

Proceeding on the Motion of the
Commission to Enable Community Choice
Aggregation

Case 14-M-0224

**AMENDMENT TO OUR PETITION FOR APPROVAL TO INTEGRATE OPT-OUT
COMMUNITY DISTRIBUTED GENERATION AS PART OF COMMUNITY
CHOICE AGGREGATION PROGRAM**

Background

The Sustainable Westchester, Inc. (SW) Community Choice Aggregation (CCA) program, Westchester Power, serves approximately 145,000 customers in Westchester County and was established pursuant to approval from the New York State Public Service Commission (the Commission) in 2015.¹ On April 21, 2016, the Commission established a framework for municipal CCA programs (CCA Framework Order).² The CCA Framework Order encouraged municipalities through their solicitations of, and negotiations with, energy suppliers to design CCA programs that include integration of distributed energy resources and procurement of clean energy, advancing the State's Reforming the Energy Vision goals.

¹ Case 14-M-0564, Petition of Sustainable Westchester for Expedited Approval for the Implementation of a Pilot Community Choice Aggregation Program within the County of Westchester, Order Granting Petition in Part (issued February 26, 2015).

² Case 14-M-0224, Community Choice Aggregation, Order Authorizing Framework for Community Choice Aggregation Opt-Out Program (issued April 21, 2016) (CCA Framework Order)

Sustainable Westchester has designed the Westchester Power Opt-out Community Distributed Generation offering to satisfy requirements outlined in the CCA Framework Order and all related subsequent orders.³

In August 2021, Sustainable Westchester submitted its Petition (Original Petition) for approval to integrate opt-out community distributed generation into Westchester Power as part of community choice aggregation program under Case 14-M-0224.⁴ Since submission of our Petition, the Commission has issued numerous orders relating to Community Distributed Generation, but has to date only authorized opt-out enrollment under the utility driven Statewide Solar for All (S-SFA) framework.⁵ Sustainable Westchester now requests the Commission to authorize opt-out enrollment through a locally tailored community choice aggregation program as a valuable complement to Statewide Solar for All.

Purpose Of Our Amendment

Through this Amendment to our Original Petition, Sustainable Westchester respectfully seeks the Commission’s approval to integrate Opt-out Community Distributed Generation into our Westchester Power program, focusing on households living in state-designated disadvantaged communities (DAC) who are not eligible for participation in Statewide Solar for All, because those households are not enrolled in the utility’s low-income energy affordability program (EAP) and have not qualified as Assistance Program Participants (APP).⁶

The proposal directs significant benefits to households in DAC communities who are

³ These subsequent orders include Case 15-E-0082, Proceeding on Motion of the Commission as to the Policies, Requirements, and Conditions For Implementing a Community Net Metering Program (“Joule Order”), as well as the Order Regarding Consolidated Billing For Community Distributed Generation (Case 19-M-0463, In the Matter of Consolidated Billing for Distributed Energy Resources) (“Net Crediting Order”) and the Order Establishing A Community Distributed Generation Program and Making Other Findings (Case 15-E-0082, Proceeding on Motion of the Commission as to the Policies, Requirements, and Conditions for Implementing a Community Net Metering Program) (“CDG Order”).

⁴ Our [“Westchester Power Master Implementation Plan Update August 2021”](#) was filed on the DMM on August 6, 2021.

⁵ Under Case Number 14-M-0224, the Commission’s Order Approving Statewide Solar for All Program with Modifications (“Statewide Solar for All order”) issued in May 2024 authorizes creation of utility managed CDG credits that are equally distributed to eligible low-income households already enrolled in the utility’s EAP program and residing in disadvantaged communities.

⁶ Here and throughout, we describe Disadvantaged Community (DAC) households as “APP households” to define those that qualify for the utility’s energy affordability program as an Assistance Program Participant (APP) and “non-APP households” to define those that do not qualify.

not served by the Statewide Solar for All program. The Opt-out CDG model targets non-energy affordability program (non-EAP, a.k.a. non-APP) households in DACs, significantly increasing the reach of renewable energy benefits. This automatic enrollment removes barriers such as the need for proactive application or understanding complex program details, which can be significant hurdles in low-income and disadvantaged communities. This approach directly supports the goals outlined in New York State's Climate Leadership and Community Protection Act, which mandates that a significant portion of the benefits from clean energy investments be directed toward DACs. The opt-out CDG model provides a policy tool that effectively targets these areas in a way that complements existing programs like Statewide Solar for All. By facilitating greater and faster enrollment, the amendment stimulates demand for new renewable energy production, which can accelerate the state's transition to a cleaner energy grid. This approach avoids the complexities of guaranteed savings requirements for APPs, leverages the CCA's framework, and focuses on households not benefiting from the utility's financial assistance programs.

Sustainable Westchester will enroll DAC households not eligible for Statewide Solar for All by targeting these potential customers at the census tract level. It will do so with a three-step process: (1) identifying the most vulnerable DAC census tracts in the municipalities already participating in our Westchester Power program, (2) estimating the CDG capacity needed for each tract, and (3) matching those DAC tracts with corresponding CDG project capacity from participating CDG sponsors.

Sustainable Westchester will draw lessons from the previously authorized Opt-out CDG offerings through a different Administrator in the Villages of Lima and Brockport.⁷ However, this Amendment presents significant differences with these existing offerings:

- (1) Our target area of the DAC census tracts represents a much larger and more demographically diverse service area.
- (2) Our implementation would take place within municipalities that already have well-established electricity supply offerings through Westchester Power.
- (3) Our Consolidated Edison service territory has higher electricity rates and therefore a correspondingly meaningful benefit in delivering guaranteed savings to DAC

⁷ For more see: <https://www.fingerlakescommunitychoice.com/>

households.

These distinctions and opportunities may advance learnings for the Commission in deliberating a broader implementation of Opt-out CDG through Community Choice Aggregation.

1. Opt-out CDG Complements Statewide Solar for All.

Sustainable Westchester supports Statewide Solar for All as a valuable state-directed, utility-managed program that will serve the poorest households who are enrolled in utility’s low-income energy assistance program, also known as Assistance Program Participants.

However, many households living in state-designated Disadvantaged Communities will not be eligible for Statewide Solar for All. Based on the latest American Community Survey 5-year data (2022), Sustainable Westchester has identified nearly 112,000 households within the five (5) municipalities participating in our Westchester Power (CCA) program that have the largest designated Disadvantaged Communities spanning 74 census tracts. Of that number, we estimate that circa 20,500 of these DAC households are eligible as potential APP households for the Statewide Solar for All and circa 91,600 of these households are not eligible for Statewide Solar for All, i.e. non-APP households.⁸ (See Table 1.)

Table 1. Top five Westchester Power participating municipalities with the largest number of Disadvantaged Community households				
Municipality	Number of DAC Census Tracts	Total DAC households	Estimated:	
			APP Households*	Non-APP Households**
City of Yonkers	45	62,832	13,287	49,545
City of New Rochelle	13	22,505	3,571	18,934
City of Peekskill	5	10,884	1,806	9,078
City of White Plains	9	13,219	1,233	11,986
Village of Sleepy Hollow	2	2616	594	2,022
Totals	74	112,056	20,491	91,565

⁸ Throughout this document “non-APP households” will refer to the DAC group that this offering proposes to target for opt-out CDG enrollment.

Source: American Community Survey, 2022, 5-year data for Westchester County NY (accessed July 2024, <https://www.census.gov/programs-surveys/acs>).

NOTE: **Municipalities in boldface** above have already adopted a revised local CCA law to enable Opt-out CDG as a Westchester Power offering.

* The estimate of APP households in DAC census tracts derives from the enrollment of households in Food Stamp or SNAP as a proxy.

**Within each DAC census tract, non-APP household counts are estimated by subtracting the estimated APP household count from the total number of DAC households.

Each of the Westchester Power municipalities in Table 1 is served by Consolidated Edison, which has among the highest electricity rates in New York State. Within the DACs in these municipalities, less than 20% of DAC households are estimated to be APP households and more than 80% are non-APP households. In short, in our most disadvantaged communities, the estimated number of households not eligible for Statewide Solar for All significantly outnumber the households eligible for APP that would be served through Statewide Solar for All.

We propose to begin serving the non-APP DAC households with a targeted Opt-out CDG offering under our Westchester Power community choice aggregation program.

The section below describes the methodology for identifying and executing the eligible customer cohorts for such an offering. This method enables establishment of rank ordered customer enrollment cohorts in a replicable and transparent manner.

2. Our methodology enables census tract level prioritization for Opt-out CDG enrollment.

We have identified the ten (10) DAC census tracts within the twenty-nine (29) municipalities participating in our Westchester Power program with the highest Statewide Combined Percentile Rank developed by the Climate Justice Working Group. (See Table 2.)

The Combined Percentile Rank considers both Environmental Burdens and Population Vulnerability scores.⁹ One of these DACs is in the City of Peekskill and the remaining nine are in the City of Yonkers. With this information, we can project the CDG capacity needed on an individual DAC census tract level. To estimate the CDG capacity needed to serve the non-APP DAC households in each tract, we assume an average capacity

⁹ For more, see <https://climate.ny.gov/resources/climate-justice-working-group/>

per household of 4 kilowatts AC.¹⁰

Table 2. Top ten DAC census tracts in our Westchester Power participating municipalities with estimated CDG capacity needed for each

<i>Order</i>	<i>DAC Census Tract GEOID</i>	<i>Municipality</i>	<i>Statewide Combined Percentile Rank</i>	<i>Burden Score Percentile</i>	<i>Vulnerability Score Percentile</i>	<i>non-APP DAC Households</i>	<i>CDG capacity needed (MWAC)</i>
1	36119014100	City of Peekskill	98.28%	98.41%	84.49%	2,252	9.01
2	36119001000	City of Yonkers	98.20%	86.04%	98.47%	277	1.11
3	36119000401	City of Yonkers	97.76%	97.89%	83.70%	2,254	9.02
4	36119014200	City of Peekskill	97.57%	97.04%	85.50%	1,293	5.17
5	36119000300	City of Yonkers	97.38%	83.79%	97.13%	916	3.66
6*	36119000403	City of Yonkers	97.28%	95.02%	87.61%	1,010	4.04
7*	36119000404	City of Yonkers	97.28%	95.02%	87.61%	829	3.32
8**	36119000501	City of Yonkers	97.26%	79.80%	97.74%	436	1.74
9**	36119000502	City of Yonkers	97.26%	79.80%	97.74%	523	2.09
10	36119001600	City of Yonkers	96.99%	94.62%	87.28%	1,430	5.72
					totals	11,220	45

* Census tract 4.02 was split into tract 4.03 and 4.04

**Census tract 5.00 was split into two tracts 5.01 and 5.02

*** Source: Adapted from ACS 2022 5 Year data, NY DAC data, and Sustainable Westchester’s internal data on DAC household electricity use, (accessed July, 2024) to estimated CDG capacity needed to serve non-EAP households in each DAC census tract.

We will prioritize census tracts designated as Disadvantaged Communities (DACs)

¹⁰ In Sustainable Westchester’s experience with enrolling low- to moderate-income households on an Opt-in basis to community distributed generation projects in 2023-2024, we found the average allocation of CDG project capacity was c. 4 kWAC based on annual electric use of c. 5,000 kWh.

with the highest Statewide Combined Percentile Rank. Should a combined rank not be available for a given DAC, the Burden score will be used.

In sum, prioritizing census tracts based on the Statewide Combined Percentile Rank coupled with the estimated non-EAP households present in those neighborhoods will enable us to offer a transparent, replicable process to prioritize enrollment of Disadvantaged Community households in long term, guaranteed savings via Opt-out Community Distributed Generation.

3. Efficiencies of our approach

The establishment of an Opt-out CDG offering within a CCA requires a process with multiple steps involving numerous parties from the municipalities to the CDG asset sponsors. As the administrator of the pre-existing, successful Westchester Power program, Sustainable Westchester has developed its approach to embed additional efficiencies specific to serving households in our most disadvantaged communities. The efficiencies flow from a few factors including documentation we have already prepared, our prioritization methodologies and our experience and familiarity with the compliance requirements for community choice aggregation administrators.

a) Document preparation:

Local Law Amendment

Each municipality that wishes to participate in an Opt-out CDG offering must adopt a local law enabling Opt-out CDG as an offering within a CCA program. Municipalities with existing CCA local laws need to amend those laws. Sustainable Westchester has already prepared and circulated redlines of the existing CCA laws to its municipalities participating in Westchester Power to expedite the local law amendment process. Upon the Commission's approval of this Amendment, we would immediately re-engage in the local law amendment process with the municipalities with DACs with the highest Statewide Combined Percentile Ranks. (For example, see the sample in Table 2 above.) We estimate that this local law amendment process will take two to three months. Note that two of the five municipalities with DACs listed in Table 1, White Plains and New Rochelle, have already amended their local

CCA laws to enable the Opt-out CDG offering through Westchester Power.

Administration Agreement

Each municipality that wishes to participate must also execute an administration agreement between the municipality and Sustainable Westchester. We already have recently renewed Electricity Service Agreements in place with each participating municipality in Westchester Power for electricity supply that authorize Sustainable Westchester as administrator of that offering. Hence, our municipalities have been repeatedly comfortable with and supportive of approving our administration of energy-related offerings for their residents. Our 2021 Master Implementation Plan, Section 4.2.9, CDG Asset procurement, describes the process as follows:

“Sustainable Westchester will enter into an Opt-out CDG Administration Agreement with each Participating Municipality defining customer participation, CDG savings rate and term length among other subjects. Sustainable Westchester will provide Participating Municipalities with the CDG solicitation so they will know the terms being sought on their behalf. Upon reviewing the CDG responses and final awards, Sustainable Westchester will enter into CDG Project Contracts with CDG Sponsors to enroll customers into the production of Net Meter Credits from CDG Assets with terms consistent with the Administration Agreement between Participating Municipalities and Sustainable Westchester.”

Solicitation for CDG Capacity

To succeed, the administrator must secure commitments from CDG project sponsors at a meaningful scale to serve the number of households eligible for participation. Due to our active Opt-in CDG program, we have existing service agreements with more than a dozen CDG developers through which we have been providing customer enrollments in opt-in CDG credit offerings. Each of the developers has expressed strong interest in the prospect of participating in an Opt-out enrollment offering. Sustainable Westchester has

prepared a draft solicitation that will circulate to CDG developers immediately upon approval of an Opt-out CDG offering. We anticipate that CDG developers will respond within one month with project capacity available for this offering.

Bilingual materials

We have English and Spanish frequently asked questions, presentations, and other education and outreach collateral already prepared for the opt-out CDG offering, available upon request. Additionally, due to our ongoing efforts to enroll low- to moderate-income households via opt-in CDG, we have a greater library of English and Spanish language education and outreach materials, from slide presentations to short videos and social media posts. These materials have already been filed with NYSERDA on behalf of developers seeking the NYS Inclusive Community Solar Adder incentive. These will be adapted, as needed, for Opt-out CDG education and outreach campaigns. We also have full-time bilingual staff to assist non-English speaking customers.

b) Prioritization methodology

The methodology that Sustainable Westchester will use is efficient, transparent and replicable over time and comprises two steps:

Identifying vulnerable census tracts

Using the state designated DAC scores to identify the most vulnerable and most burdened census tracts creates a prioritized list of DACs to target for inclusion. (See for example the sample in Table 2 above.) That order will determine the sequence with which the census tracts will be served, starting with the most vulnerable. Note: The final order of service will be restricted to DACs in those Westchester Power municipalities that have amended their local CCA law and signed the Administration Agreement. As of this writing, the DACs in New Rochelle and White Plains may be sequenced ahead of those in Yonkers as the former two have already adopted the amended local CCA law. If Yonkers adopts an amended local CCA law and signs the Administration Agreement before we commence enrollment cohort selection,

then Yonkers' DACs in this sample would take priority over the other cities based on the scores in Table 2.

Estimating CDG capacity needed

For each vulnerable census tract, Sustainable Westchester will estimate the number of non-APP DAC households. In Sustainable Westchester's experience in 2023-2024 with enrolling low- to moderate-income households on an Opt-in basis to community distributed generation projects, the average allocation of CDG project capacity per household was c. 4 kWAC, representing an average annual electric use of c. 5,000 kWh. As shown in Table 2 above, the average CDG capacity per census tract needed to serve the non-EAP household in these ten most vulnerable census tracts is c. 4.5 MWAC of CDG capacity, or a total of 45 MWAC for all ten tracts.

Matching DAC census tracts with CDG projects

Sustainable Westchester will match CDG project sponsors with sufficient project capacity to serve specific DAC census tracts. In our analysis of the non-APP households in DAC designated census tracts, the CDG capacity needed to serve that population is often in the 1 to 9 MWAC range. (See Table 2.) This size pairs up nicely with the capacities of projects in the CDG pipeline. This coincidental closeness-of-fit between supply and need offers an opportunity for an "Adopt-a-solar neighborhood" initiative in which CDG developers pick a specific census tract to which to dedicate a fleet of CDG projects to enroll eligible DAC customers. Such a connection between a CDG developer's projects and a community of subscribers offers other location-based benefits, such as recruiting from that neighborhood for workforce development, etc. Such hyper-localized opportunities would be unique to this Opt-out CDG approach over the Statewide Solar for All program. The commercial operation date for each CDG project will determine the timing of the Education and Outreach period for each DAC census tract. When commence operation dates are closely clustered in time, the Education and Outreach campaign may cover multiple DAC census tracts simultaneously.

c) Prior Experience

Sustainable Westchester has ample experience with the compliance requirements for community choice aggregation through the existing Westchester Power program.

Notification letters

Whereas Westchester Power supply offering notification requires thousands of letters be prepared and sent all at once, we anticipate that the Opt-out CDG methodology outlined here will produce smaller mailings to eligible customers in individual census tracts as CDG projects approach commercial operation. Our Westchester Power program may have customers eligible for Opt-out CDG already enrolled in an electricity supply offering. However, the Opt-out CDG enrollment is independent of any participation in our other offerings and will be subject to its own notification letter. Mailing of opt-out CDG notification letters will target eligible customers in each DAC.

Municipal filing

Through its Westchester Power supply contract renewals, Sustainable Westchester is well acquainted with the municipal filing requirements for CCA administrators, including the local law, the request for proposal (for Opt-out CDG, this would be the Solicitation for CDG capacity), the Energy Service Agreement (for Opt-out CDG, this would be the CDG administration agreement and CDG agreement with developer(s)), the notification letter, and Education and Outreach information.

4. Opt-out CDG leads to lower soft costs

It is our view that the additional marginal soft costs for this offering would be lower than those for Opt-in enrollment, permitting a reduction in the Inclusive Community Solar Adder when applied to CDG assets that employ Opt-out enrollment.

Specifically, we propose a 25% reduction in the Inclusive Community Solar Adder for Opt-out CDG projects committed to a Westchester Power offering. For example, this reduction would result in the following three-tiered structure of incentives for CDG projects in the Consolidated Edison service territory. (See Table 3.)

Table 3. Proposed Adder rates for Opt-out CDG via CCA for Consolidated Edison service territory

Method	Target customers	NYS incentives (\$/watt DC)		
		Community Adder Tranche 1	ICSA	Total
Opt-in	Non-APP/ non-DAC/ non LMI Households	\$0.20	None	\$0.20
Opt-in	DAC Households	\$0.20	\$0.20	\$0.40
Opt-out	DAC Households	\$0.20	\$0.15	\$0.35

If implemented, the net impact would leave more Inclusive Community Solar Adder funds available for Opt-in CDG projects for which customer acquisition is more costly.

In all cases, it is assumed that base incentives would remain unchanged. It is also assumed that subsidies associated with a Statewide Solar for All program would not be greater than those for Opt-out CDG as both employ the same efficiencies of an opt-out enrollment path.

5. Opt-out CDG greatly accelerates enrollment of disadvantaged community customers over Opt-in enrollment.

Opt-in CDG programs to enroll low- to moderate-income households suffer from low enrollment rates, limiting their impact in disadvantaged communities. Switching to an Opt-out model would significantly boost enrollment, ensuring that the benefits of clean energy reach a larger portion of these communities more effectively and equitably.

Significant barriers of language, technology, and social trust require intensive, time-consuming effort to achieve robust engagement of community advocates and partners and enrollment of LMI and DAC customers.

Our recent opt-in customer acquisition work targeting LMI and DAC customers has met the needs of the CDG sponsors for those projects. Yet the cumulative results have been

modest. Fewer than 200 of our current CDG accounts are LMI or DAC customers, representing about 5% of our entire CDG customer base. The conversion rate of potential LMI/DAC customers targeted to CDG customer agreements executed is very low under Opt-in methods.

An Opt-out process for CDG would permit the rapid scale-up of LMI and DAC customer enrollment, with savings flowing almost immediately to thousands of vulnerable New York households.

6. Opt-out CDG Will Stimulate New Renewable Energy Production

Developers paused many projects from the twin disruptions caused by the COVID pandemic and the changes in the NY-SUN incentive program and anticipation of the new federal Inflation Reduction Act incentives. Now that those factors have been clarified, the existing pipeline will grow aggressively as previously paused projects are revived and new projects are launched based on all the recent lessons being learned and incentives on offer.

Today, developers are eager to work with an Opt-out CDG enrollment path. CDG project sponsors are particularly excited to learn they could have access to thousands of mass market low- to moderate-income enrollees in an efficient and cost-effective opt-out customer acquisition process. This interest is especially high among CDG developers who are committed to serving DAC households and have up to now experienced difficulties of doing so under opt-in enrollment methods.

7. Sustainable Westchester is well suited to conduct this advancement of New York State's Climate Justice goals.

Sustainable Westchester is unique among New York's community choice aggregation administrators in offering a broad portfolio of separately funded programs targeting New York State's greenhouse gas emission reduction goals from residential energy efficiency to commercial building decarbonization. Our municipal members rely upon us to deliver information about all our services to constituents.

In this role as a local trusted source, our staff have thousands of interactions each year with Westchester County residents regarding these other programs. As our largest program, Westchester Power generates the largest volume of interactions.

Each resulting conversation represents an opportunity to assist the inquiring

constituent with questions about heat pumps, electric vehicles, solar energy, battery storage, electrifying lawn care, demand response, composting and the list goes on. (See Table 4.)

Table 4. Sustainable Westchester’s programs	
Program	Funding source
Westchester Power (electricity supply)	Energy Service Companies
Commercial Building Decarbonization	US DOE Renewing America’s Nonprofits
Energy Smart Homes	NYSERDA Clean Energy Hubs
GridRewards™ (residential and small commercial demand response)	Utility (Consolidated Edison)
Community Solar (customer acquisition and management)	CDG developers
Solar & Energy Storage (project origination)	CDG developers
Recycle Right	Participating Municipalities
Solar Technical Assistance for Affordable Multi-family Providers	NYSERDA PON 3414 grant

Our Request

We hereby petition the Commission to authorize Sustainable Westchester to proceed with Opt-out Community Distributed Generation within our existing Westchester Power program focusing on households in Disadvantaged Communities who are not eligible to participate in Statewide Solar for All offering. This would enable us to test assumptions, refine financial models, further gauge developer interest, and otherwise acquire valuable lived experience that could inform subsequent State decision-making.

NOTE: This amendment describes a methodology to serve non-APP DAC households. Should the Commission wish the Opt-out CDG offering to serve APP households ahead of any non-APP households, Sustainable Westchester will amend the process by adding the APP cohorts ahead of non-APP households in the DAC prioritization process. This approach is fully compatible with the dual participation authorized by the Commission in 2022, enabling Solar for All participants to also participate in one other

distributed solar program.¹¹

Conclusion

In consideration of the above, Sustainable Westchester respectfully requests the Commission approve our Petition to integrate Opt-out Community Distributed Generation into the Westchester Power program as augmented by the information presented in this Amendment to the original Petition.

In advance of such approval, Sustainable Westchester further requests that the Commission require Sustainable Westchester to submit a revised Master Implementation Plan incorporating the information presented in this Amendment and any revisions the Commission may request, as well as any documentation that the Commission deems necessary for such approval to proceed.

Date: October __, 2024

Respectfully submitted on behalf of Sustainable Westchester, Inc.

Noam Bramson, Executive Director
Sustainable Westchester, Inc
40 Green Street
Mount Kisco, NY 10549
(914) 242-4725 ext. 124
noam@sustainablewestchester.org

Enclosure: Appendix

¹¹ Under Case Number 19-E-0735, the Commission's Order Modifying Expanded Solar for All Program with Modifications issued in September 2022 authorizes dual participation as follows: "the Commission hereby modifies the E-SFA program EAP customers may simultaneously participate in the E-SFA program and in one other distributed solar program like CDG, Remote Crediting, or RNM." (Order at page 2.)

Appendix

The following documents are available upon request.

1. Updated Master Implementation Plan (incorporating the information in this Amendment).
2. Template local legislation enabling a community choice aggregation to offer supply and distributed generation products.¹²
3. Draft Administration Agreement between Sustainable Westchester and participating municipalities.
4. Template Notification Letter to Eligible Customers and accompanying CDG Standard Disclosure Form.
5. Request for CDG Capacity for CDG developers.
6. Draft educational and outreach materials including offering web page content, informational handout, frequently asked questions, customer communication and municipal outreach templates and documentation of multilingual support.

¹² The following municipalities have already updated their local law for Community Choice Aggregation to incorporate Opt-out CDG based on the 2021 version of that language developed with DPS staff input: City of New Rochelle, City of White Plains, Town of Ossining, Town of Bedford, Town of North Salem, Town of Yorktown, Village of Ardsley, Village of Hastings-on-Hudson, Village of Larchmont, Village/Town of Mount Kisco, Village of Ossining, Village of Tarrytown.