



October 6, 2016

Re: (Case 15 E-0082) Petition to waive ten-member minimum requirement for community distributed generation projects sited on multi-family residential properties.

Dear Public Service Commissioners:

This letter of support is submitted on behalf of members of the New York Solar Energy Industries Association (NYSEIA), in response to the September 1, 2016 petition requesting a waiver of the minimum member requirement for community distributed generation projects (CDG) on multi-family residential properties. The petition was submitted by the City of New York, Solar One, Grid Alternatives, The Natural Resources Defense Council, the Association for Energy Affordability and the Environmental Defense Fund.

NYSEIA strongly supports the current CDG program, but agrees with the petition that as written, the ten-member minimum requirement for CDG currently discourages on-site distributed generation in dense urban settings, where more opportunities and options for deploying distributed generation are needed and desired. Due to density, property costs, and other barriers, opportunities to install on-site solar and other distributed generation in urban areas are inherently limited. Specifically, the current CDG program minimum member requirement prevents residents of small apartment buildings, with fewer than ten units, from straightforwardly installing solar panels and other clean distributed generation on their property.

NYSEIA recommends that the requested waiver of the minimum member requirement be granted so that residents of New York's urban population centers are encouraged as much as possible to participate in, and further, the state's clean energy objectives. NYSEIA agrees that, by waiving the ten-member minimum requirement to participate in CDG, the Commission can facilitate greater access to clean distributed energy. Specifically, the waiver would enable clean energy adoption by low and moderate income New York residents, one of the stated objectives of the CDG program¹. Waiving the minimum requirement for multi-family CDG projects will allow more residents to take advantage of economic savings while investing in their communities and advancing New York on the path to 50 percent clean energy by 2030.

NYSEIA strongly encourages the Public Service Commission to grant the request put forth in the September 1 petition to waive the ten-member minimum for CDG projects on multi-family residential properties.

Thank you for your consideration.

Sincerely,
Carlo P. Lanza
President, Board of Directors
New York Solar Energy Industries Association

¹ NY PSC July 2015 case 15-E-0082 Motion of the Commission as to the Policies, Requirements and Conditions for Implementing a Community Net Metering Program.