



August 26, 2020

Honorable Michelle Phillips, Secretary  
New York State Public Service Commission  
3 Empire State Plaza, 19th Floor  
Albany, NY 12223-1350

**RE: Case 19-M-0463 – In the Matter of Consolidated Billing for Distributed Energy Resources**

Dear Secretary Phillips:

Navisun LLC is a CDG sponsor, currently the owner of two projects, Marathon Solar Farm LLC, and Marathon Solar Farm II LLC, in Lenox, NY – National Grid Zone E. We believe there is an opportunity to simplify and realize cost savings as Utility Consolidated Billing (UCB) is implemented. New York is a leader in the community solar movement and some small changes to the proposal presented by the Joint Utilities at the July 23, 2020 stakeholder meeting will benefit the growth and long term economic and environmental impact of community solar.

Specifically, the credits that a consumer generates each month should all be recognized on the consumers' bill in that month. This will avoid customers needing to keep track of "banked" credits and provide a more seamless experience for the utility customer. This approach allows the customer to logically understand how the CDG process works, and provides an easier to understand bill. The utilities should benefit by simplified accounting thus lowering administrative costs of the program.

Navisun is excited about the implementation of UCB and the potential that it represents to bring community solar to a broader range of customers. A couple of small changes will simplify and enhance the program for all stakeholders involved. Navisun supports BlueWave's alternative proposal that was presented at the stakeholder meeting on August 13, 2020.

Please don't hesitate to reach out to me if you would like to discuss in more detail.

Sincerely,

*Carl Engelbourg*

Carl Engelbourg  
Navisun, LLC  
508.395.1338