

**STATE OF NEW YORK
PUBLIC SERVICE COMMISSION**

**Proceeding on Motion of the Commission as to the
Policies, Requirements and Conditions For
Implementing a Community Net Metering
Program.**

Case 15-E-0082

Pace Energy and Climate Center

Dated: October 14, 2016

Comments in Support of Joint Request Waiver

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On September 1st, 2016, the City of New York, Solar One, GRID Alternatives, Natural Resources Defense Council (NRDC), The Association for Energy Affordability, and Environmental Defense Fund (collectively, “Petitioners”) submitted to the New York Public Service Commission (the “Commission”) a request for a waiver of the current ten-member minimum for Community Distributed Generation (“CDG”) projects located on properties with multiple residential units.¹ The Pace Energy and Climate Center (“Pace”) provides these comments in support of the Petitioners’ waiver request.

Pace has been a leading voice for increased DG penetration and access for customers in New York for many years. In addition to commenting on the Staff Straw Proposal for a Net Metering Program, Pace has published numerous reports and analyses on deployment of DG and microgrids in New York State,² and has commented and testified before the Commission on the value of DG to the grid in numerous rate cases, including Consolidated Edison’s, Central Hudson Gas and Electric’s, and Orange and Rockland Utilities’. Two of our staff, Karl Rábago and Jordan Gerow, served on the Study Committee for the Shared Clean Energy Facilities report by the Connecticut Academy of Science and Engineering delivered to the Connecticut General Assembly in April 2015. Pace also houses the Northeast Solar Energy Market Coalition (NESEMC), a project of the U.S. Department of Energy’s SunShot Initiative, bringing together solar energy business associations and other stakeholders in the Northeast to harmonize regional solar energy policy and advance the solar energy market. The Coalition tracks solar policy

¹ Case 15-E-0082, Proceeding on Motion of the Commission as to the Policies, Requirements and Conditions For Implementing a Community Net Metering Program, Joint Request of the City of New York, Solar One, Grid Alternatives, Natural Resources Defense Council, The Association for Energy Affordability and Environmental Defense Fund to Waive the Minimum Membership Requirement for Community Distributed Generation Projects Sited at Properties With Multiple Residential Units (September 1, 2016).

² See, e.g., “Valuing and Supporting the Expanded Deployment of Grid-Connected Distribution Generation in New York State,” published July 2011, or “Deployment of Distributed Generation for Grid Support and Distribution System Infrastructure,” published 2011, both available at energy.pace.edu/publications.

developments, identifies gaps and opportunities in state solar policy, educates policymakers on sound solar policy, and engages stakeholders across the region.

Pace commends the Commission on its implementation of CDG as described in the July 17th, 2016 Order approving the program.³ As Pace and others initially commented, the benefits of CDG are numerous. CDG allows all electricity consumers to share the benefits of clean distributed generation when they otherwise would not be able to support traditional onsite generation for financial and property related reasons. In addition to households that physically cannot support onsite generation, many low and moderate income households rent their housing and therefore face large obstacles and disincentives to procuring onsite generation such as rooftop solar—even when the location may be suitable for distributed generation like rooftop solar PV. CDG offers a pathway for these households to control their energy future and participate in the clean energy economy being fostered by New York State.

Pace believes the Petitioners' waiver request will only improve the State's already strong CDG Program and further increase access to clean distributed energy for households that may otherwise not be able to obtain it. As Petitioners' state, the current 10-member minimum precludes many small and moderate-sized multi-family buildings from participating in this program. While such buildings could technically enroll customers from outside the building to participate and meet the minimum, recruiting customers may be more onerous outside the natural community of a single multi-family building. In addition, the building may not be able to support generation large enough to supply the minimum 1,000 kWh per year needed for a 10-member subscription size. By granting a waiver to the ten-member minimum rule for multi-family CDG projects, the Commission would be consistent with the original intent of the CDG Order, which recognized unique barriers for households in multi-unit buildings when it provided important provisions for participation by consumers located in master metered multi-unit buildings.⁴

Granting Petitioners' waiver request will also serve to help New York State meet its ambitious clean energy goals set forth in innovative programs and initiatives including the Clean

³ Case No. 15-E-0082, Proceeding on Motion of the Commission as to the Policies, Requirements and Conditions for Implementing a Community Net Metering Program, Order Establishing a Community Distributed Generation Program and Making Other Findings (issued July 17, 2015) ("CDG Order").

⁴ See CDG Order at 14.

Energy Standard (“CES”), Reforming the Energy Vision (“REV”), and NY-Sun Program. The CES lays the groundwork for achieving 50% renewable energy by 2030 in New York State, and the NY-Sun Program is set to deploy more than 3,000MW of solar capacity in the state by 2023. Improving access to distributed clean energy for households in smaller multi-family buildings will move New York closer to both of these deployment goals. Under REV, the State aims to animate markets for distributed energy resources in part to reduce costly congestion in the State’s transmission and distribution networks. CDG projects that would become allowable if this waiver request is granted would be predominately located in high density urban areas, which also tend to be where transmission and distribution constraints are greatest. Allowing smaller multi-family buildings to more easily host on-site generation in these areas would contribute to REV’s ultimate goals.

For the reasons described above and set forth in Petitioners’ Request for Waiver, Pace strongly encourages the Commission to grant the request to waive the 10-member minimum for CDG projects located on multi-family residential properties. Thank you for your consideration.

Respectfully submitted,

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On Behalf of Pace Energy and Climate Center