



October 30, 2014

Hon. Kathleen H. Burgess
Secretary to the Commission
New York State Public Service Commission
Agency Building 3
Albany, NY 12223

RE: Case 14-E-0422, Petition of Solar Energy Industries Association, Alliance for Clean
Energy New York, the Vote Solar Initiative, the Natural Resources Defense Council and the Alliance for Solar
Choice to Clarify the Process for Utilities to Seek Relief from Net Metering Caps

Case 14-E-0151, Petition of Hudson Valley Clean Energy, Inc. for an Increase to the Net Metering Minimum
Limitation at Central Hudson Gas & Electric Corporation

Dear Secretary Burgess,

On behalf of Dynamic Energy Solutions, LLC, I am writing to express our support for the above-referenced petitions regarding New York State's net metering program. As detailed in these two petitions, net metering is a critical component of the state's growing renewable energy market and is an imperative tool for New Yorkers to take greater control over their energy choices. We appreciate the opportunity to voice our support for these petitions and urge the Public Service Commission ("Commission") to move forward with their approval.

As exemplified by New York's thriving solar and renewable energy industries, net metering is one of the most effective policies for supporting customer generation of renewable energy. The simplicity and understandability of net metering have been pivotal in reducing barriers to consumer uptake of energy technologies such as solar, and it is arguably one of most successful market transformation policies for renewable energy markets. For net metering to be an effective policy, however, it is essential that it be designed with sufficient horizon to support sustainable growth of customer-sited renewable energy deployment. Equally as important is that net metering is aligned with other state policies and programs that encourage customer adoption of solar and renewable energy; in the case of New York, most prominently the NY-Sun Initiative ("NY-Sun"), which is expected to support the development of approximately 3,500 MW of solar across the state by 2023 if not sooner.

These two petitions before the Commission address immediate concerns with the certainty and visibility of net metering in the state. First, the Hudson Valley Clean Energy ("HVCE") petition draws attention and requests resolution with respect to the impending net metering limitation in Central Hudson Gas and Electric service territory. HVCE posits that without raising Central Hudson's 3% net metering limitation, to the suggested 12% of 2005 peak load, solar penetration will hit this 3% threshold in the very near future thereby causing significant market disruption. The Solar Energy Industries Association ("SEIA") et al. petition similarly describes the need for certainty and a stable regulatory framework around net metering in order to ensure that New York maintains its positive solar market momentum. Accordingly, this petition requests that the Commission direct the utilities to seek



relief from their respective net metering limitations once reserved capacity reaches 90%. The petition further requests the Commission to direct utilities to modify these program limitations in order to provide stable net metering horizon at least through the implementation of utility-specific plans as part of the Reforming the Energy Vision ("REV") proceeding.

We strongly agree with the arguments set forth in both of these petitions and believe that their requests offer a reasonable approach for ensuring market certainty for renewable energy industries and consumers alike. As the Commission has previously stated, while deliberations continue regarding New York's regulatory framework and clean energy programs, they expect that utilities will continue accepting applications for customer-sited generation. We believe that the two petitions being considered here are fully consistent with that intent and we urge the Commission to effectuate this intent through the approval of these petitions.

With more than 415 solar companies at work through the value chain in New York employing approximately 5,000 individuals, it is imperative that foundational programs such as net metering are able to continue supporting the state's clean energy economy and opportunity. We strongly believe that net metering can continue to serve this important purpose while the stakeholders deliberate the future of New York's regulatory paradigm.

We sincerely appreciate the opportunity to submit our support for these petitions and further appreciate the Commission addressing this very important issue.

Sincerely,

A handwritten signature in black ink that reads 'Scott Starr'.

Scott Starr

Vice President of Business Development

Dynamic Energy Solutions, LLC

63 Putnam Street, Suite 202

Saratoga Springs, NY 12866

(518) 894-8002