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March 10, 2010

Hon. Jaclyn A. Brilling
NYS Department of Public Service
3 Empire State Plaza
Albany, NY 12223-1350

Dear Secretary Brilling:

I am writing to comment on the Central Hudson rate case, 09-E-0588. I am hoping to affect changes in Central Hudson's tariffs that will help resolve an issue I am having regarding my net metered solar system. Specifically, I am requesting that the utility's tariffs permit net metered customers to choose their anniversary month.

The financial benefit of a net metered residential solar system is maximized by accumulating credits for excess generation in the higher producing summer season and then using these credits in the lower producing winter time. This is possible when the net metering anniversary date is in the spring. On the other hand, having an anniversary date in the fall, results in a customer not having credits available for the winter, then accumulating credits in the summer which are then zeroed out in the fall at lower avoided cost.

I have asked Central Hudson to change my anniversary date to the spring, but the utility has refused. They state that they cannot change the anniversary date because it is set in their tariffs. Looking under the portion they specified, Leaf 166, did not reveal a passage which prohibits changing the anniversary date. Leaf 167.1 does not state the net metering anniversary date corresponds to twelve months after the net metering service was initiated. Central Hudson says that moving my anniversary date would mean that it no longer corresponded to my net metering service commencement, and therefore, they cannot change it.

Many PV customers are already net metering more effectively and with a better return on their investment than I am, because they had the good fortune of having their systems installed in the spring. This is unfair discrimination among utility customers and should be corrected. Obtaining optimum net metering should not depend on what time of the year an installation takes place.

The solution is to allow customers like me to choose the month of their anniversary date regarding of the installation date. I am asking the PSC to consider this when reviewing the Central Hudson rate case. I understand that Central Hudson's tariffs will be revised, and I hope the PSC will change the language of Leaf 166-167 so that all customers can choose the month of their net metering anniversary date.

Thank you for your consideration.



DAVID A. SEARS

DAS:klg

cc: Senator, Steve Saland
Assemblyman, Marcus Molinaro