



July 31, 2012

The Honorable Garry A. Brown, Chairman
The Honorable Patricia L. Acampora, Commissioner
The Honorable Gregg C. Sayre, Commissioner
The Honorable Maureen F. Harris, Commissioner
The Honorable James L. Larocca, Commissioner
New York State Public Service Commission
Empire State Plaza-Agency Building 3
Albany, NY 12223-1350

RE: Hudson Valley Clean Energy Inc. Petition to Request an Increase in the Net Metering
Limit for Central Hudson Gas & Electric- Case No. 08-E-1305

Dear Mr. Chairman and Commissioners:

On behalf of the 1,000 member companies of the Solar Energy Industries Association (SEIA) I am writing in strong support of the Hudson Valley Clean Energy Inc. (Hudson Valley) petition to request an increase in the net metering limit for Central Hudson Gas & Electric Corporation (Central Hudson). SEIA is the national trade association of the United States solar industry, encompassing all solar technologies and all points in the solar value chain from manufacturing to project development to installation.

SEIA was very concerned to learn that on July 19, 2012, Central Hudson notified Hudson Valley and other solar installers that net metering was suspended for new applications in their service territory because a net metering limit of 12 MW had been reached. The precipitous shutdown of the net metering market by Central Hudson is extremely damaging to the solar market and will cause the loss of the substantial public interest benefits of additional net metering. It is also completely unnecessary because the New York State Public Service Commission (Commission) has concluded that under existing law electric utilities such as Central Hudson may take on additional net metering

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customers notwithstanding any limit.¹

Central Hudson's suspension of net metering is also completely contrary to the NY-Sun Initiative launched by Governor Cuomo just a few months ago. The NY-Sun Initiative seeks to double the amount of customer- sited solar power installed annually in New York, and quadruple that amount by 2013. For this initiative to accomplish its goals a broad series of solar policies must all be vigorously implemented, including net metering. What we need from Central Hudson to accomplish the NY Sun goals is leadership, not foot dragging.

Even a delay in net metering installations for weeks or a few months can have a devastating and longstanding negative impact on the market, with the smallest solar companies going out of business for good. Consequently, it is absolutely vital that the Commission act expeditiously, through whatever means are necessary, to immediately triple the Central Hudson net metering cap as suggested by Hudson Valley.

Thank you for your consideration of this request.

Sincerely,



Daniel M. Adamson
Vice President of Regulatory Affairs & Counsel
Solar Energy Industries Association

cc: Carrie Cullen Hitt, Vice President State Affairs, SEIA

¹ CASE 08-E-1305 pg. 7, note 4 (August 21, 2009)