



April 8, 2013

Via E-Mail [secretary@dps.ny.gov](mailto:secretary@dps.ny.gov)

Honorable Jeffrey C. Cohen  
Acting Secretary to the Commission  
New York State Public Service Commission  
Three Empire State Plaza  
Albany, NY 12223-1350

**Re: CASE 03-E-0188, NYSERDA PETITION REGARDING UNENCUMBERED CST FUNDS**

Dear Acting Secretary Cohen:

The Pace Energy and Climate Center (“Pace”) appreciates the opportunity to file these comments in support of NYSERDA’s petition to reallocate unencumbered 2012 customer-sited tier (CST) funds.

Reallocating these funds as proposed will allow NYSERDA to strategically increase technology category budgets to fit changing market demands and maximize the effectiveness of the CST. Furthermore, the reallocation can help prevent uncommitted funds from sitting idle in technology category budgets with lower than expected participation.

NYSERDA’s proposed reallocation will enlarge the Solar PV 2013 budget by more than 30%, an increase of \$11.6 million.<sup>1</sup> Pace agrees with this decision to use unencumbered funds to boost the Solar PV budget, as it will help meet the bold targets set forth in Governor Cuomo’s NY-Sun initiative. The additional funding for Solar PV will also lead to increased stability in New York’s solar market and is expected to result in 15 MW of additional installed solar capacity.<sup>2</sup>

At the same time, we recognize the importance of sustained, robust support for *all* of the CST technologies in order to ensure the state’s RPS drives the adoption of a diverse universe of renewable resources. As proposed, we support the NYSERDA reallocation, as it successfully balances this need to support multiple technologies with the need to respond to fluctuating demand in the marketplace.

Respectfully submitted,

Adam Cohn, Energy Analyst  
Pace Energy and Climate Center  
78 North Broadway White Plains, NY 10603  
[acohn@law.pace.edu](mailto:acohn@law.pace.edu)

---

<sup>1</sup> Case 03-E-0188, Proceeding on Motion of the Commission Regarding a Retail Renewable Portfolio Standard, *NYSERDA Petition Regarding Unencumbered CST Funds*, Issued January 30<sup>th</sup>, 2013

<sup>2</sup> *Ibid*