



August 28, 2019

Hon. Kathleen H. Burgess, Secretary
Public Service Commission
3 Empire Plaza Albany, N.Y. 12223

Re: Case 19-M-0463

Hon. Secretary Burgess:

Citizens for Local Power strongly supports utility consolidated billing for Community Distributed Generation (CDG) projects. We believe consolidated billing is vital to encourage the widespread adoption of community solar, and that scaling up community solar is essential to achieve New York State's goals of producing 70 percent of the state's electricity from renewable sources by 2030 and reducing GHG emissions 40% by 2030 and 85% by 2050.

Citizens for Local Power has been an active participant in developing New York's Community Choice Aggregation (CCA) program from its outset. We have consistently advocated for CCA as an important mechanism to drive local renewable energy production.

In 2016-2017, we participated in the CCA Subgroup of the Voluntary Investment in Other Market Development (VIOMD) Working Group of the Clean Energy Advisory Council (CEAC). One of our primary recommendations as part of that Subgroup was that consolidated billing be adopted in order to allow CCA programs to enroll participants in community solar and other renewable CDG programs on an opt-out basis.

Our experience in promoting community solar within our communities and fielding questions



from both residents and municipalities about community solar programs indicates that there are many informational barriers to community solar adoption by local residents and small businesses. At the same time, customer acquisition costs remain one of the largest barriers to CDG project success. Enabling opt-out renewable CDG through CCAs is a key strategy to increase the accessibility of renewable generation to customers and greatly increase local renewable generation.

However, dual-billing represents a barrier to opt-out CDG. CCA programs cannot risk the customer confusion that dual bills would create. A PSC regulation requiring consolidated billing will allow existing CCAs and those in formation to achieve their promise of dramatically increasing local renewable energy generation.

The scale and speed at which we need to increase local renewable generation in order to reach State goals is both daunting and urgent. We cannot afford to leave a strategy like this on the table. We urge the PSC to act quickly to remove the barrier of dual billing and enact required consolidated billing for CDG projects.

Sincerely,

A handwritten signature in blue ink that reads "Susan H. Gillespie".

Susan H. Gillespie

President of the Board

Citizens for Local Power