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**MEMORANDUM IN SUPPORT OF
S.3521-A (Parker)/A.3805-A (Cusick)
In Relation to the transfer of bill credits associated
with the electricity produced by community
distributed generation facilities**

March 2021

The Alliance for Clean Energy New York (ACE NY) supports S.3521-A/A.3805-A and urges its immediate passage. This bill expands customer access to community distributed generation by creating a model tariff to provide for the transfer of bill credits associated with electricity produced by community distributed generation facilities in one electric utility territory to other utility territories.

This bill will direct the Public Service Commission (PSC) to authorize the transfer of community distributed generation (CDG) bill credits across utility service territories. Currently, a similar program exists to allow Energy Service Companies (ESCO) to serve customers in multiple utility territories. This will expand CDG access to any New Yorker served by a utility subject to PSC jurisdiction and would allow them to participate in a CDG project located anywhere in New York State. This will enable all New Yorkers to equally benefit from lower-cost solar, especially disadvantaged communities that lack rooftop access or larger developable sites.

Without Cross Utility Crediting, New York City and other urban areas are effectively barred from participating in community solar, given the lack of suitable rooftops and available land. Con Edison customers are billed to support the CDG program but cannot equally access its benefits. There are 4.8 GW of CDG in the upstate development queue, but only 198 MW in Con Edison or 4% of the total. That would serve less than 30,000 households in a city of 9 million people, which is only 0.3%.

Two goals of the Climate Leadership and Community Protection Act are to build 6 gigawatts (GW) of distributed solar generation by 2025 and to provide benefits to disadvantaged communities through the provision of low-cost renewable power. NYS cannot build the transmission infrastructure to achieve this first goal in time and faces further transmission "bottling" issues to deliver the accelerated expansion of renewable energy development to the 50 percent market penetration level by 2030. This bill would help achieve the state's ambitious solar goals without adding to the problem, by moving bill credits instead of electrons.

For the above reasons, the Alliance for Clean Energy New York supports this legislation. For more information contact Deb Peck Kelleher, Director of Policy Analysis & Operations, at (c) 518-698-3211.