

Sullivan Alliance for Sustainable Development  
(SASD)

# Sullivan County Community Choice Aggregation

Case 15-E-0585

Sullivan County CCA Demonstration Project

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**Petition of Sullivan Alliance for Sustainable Development (SASD)** in connection with the implementation of a demonstration Community Choice Aggregation (CCA) program within Sullivan County, for an order requiring New York State Electric & Gas (NYSEG), Central Hudson Gas & Electric (Central Hudson), and Orange & Rockland Power (Orange & Rockland) to provide certain customer information to the petitioner, and for an order providing relief to petitioner from certain requirements of the Uniform Business Practices (UBP) related to allowing SASD's proposed opt-out approach for electric purchases.

SASD further petitions the Public Service Commission to permit Sullivan County Community Choice Aggregation (SCCCA) to impose surcharges to pay for the administration of the program and to support the introduction of Energy Efficiency (EE) measures and to build out local renewable energy systems that will ensure long term price stability, relieve pressure on the grid, and help New York State achieve its goal of reducing greenhouse gas (GHG) emissions. These revenue streams are described in detail elsewhere in the petition.

Finally, SASD petitions the Commission to order utilities to permit SASD/SCCCA to include 1,000 character messages, or inserts, in their monthly bills.

SASD is attaching copies of two resolutions adopted by the Sullivan County Legislature on June 18, 2015 and September 17, 2015 in support of SASD's application to develop a CCA program in Sullivan County and authorizing SASD to file this petition.

### **Project Overview**

On behalf of the ratepayers of Sullivan County, the 501(c)(3) not-for-profit Sullivan Alliance for Sustainable Development (SASD) proposes a countywide Community Choice Aggregation (CCA) demonstration project. SASD's application is in response to the New York Public Service Commission's (Commission) invitation for third parties and utilities to submit applications for demonstration projects that will further the goals of the Commission's Reforming the Energy Vision (REV) including "developing Distributed System Platform (DSP) functionalities, measuring customer response to programs and prices associated with REV markets, and determining the most effective implementation of Distributed Energy Resources (DER)."

The focus of the CCA proposed by SASD is energy planning and coordination that will achieve a maximum build-out of DER, manage impacts on the electric grid that serves the county during

a period of unprecedented economic transformation, lower costs of electrical energy, reduce greenhouse gases, and ensure more equitable access to best performance energy service. Emphasis will be placed on public engagement that makes the case that energy efficiency and renewable energy generation should be normative in Sullivan County. This CCA demonstration project will be developed with the support of the three utilities operating in Sullivan County (NYSEG, Central Hudson, and Orange & Rockland) as integral partners. In developing this proposed CCA, SASD will seek input from the Sullivan County Legislature and its departments, and town and village governments as well as financial, commercial, civic, residential and energy provider representatives.

### **About SASD**

Founded in 2004, SASD is a hybrid organization comprised of both grassroots volunteers and professional staff. The organization has had a contract with the county to develop sustainable energy policies and projects since 2009 and is deeply engaged with the community. Thus it is well positioned to perform the kind of public outreach that will ensure the success of a countywide CCA. (For more about SASD, see Appendix A.)

SASD board members and staff have extensively researched the operation of CCAs in other states and have had in-depth conversations with principals from Sustainable Westchester and Ulster County's Citizens for Local Power, the two New York not-for-profit organizations that have already sought Commission approval for CCAs. We gratefully acknowledge the groundbreaking work done by these two organizations and seek to adapt some of their ideas to meet the needs of Sullivan County.

### **About Sullivan County**

Sullivan is a rural county with a year-round population of around 77,000. As a rural county, Sullivan faces typical challenges that include high poverty rate, poor health outcomes and substandard housing conditions. The Sullivan County Legislature is firmly committed to a sustainable energy future and has taken a number of steps to move toward a more sustainable future. (See Appendix B for a detailed list of the actions the county has taken to chart a sustainable energy course.)

Because of the county's small population, and because of the county legislature's commitment to sustainability, we believe the county itself should be the controlling municipality for the CCA.

### **Division of Responsibility**

SASD will work with a professional project design team and legal counsel to develop the program structure and the community outreach program that will build public support for the project. SASD will also play an ongoing role as liaison between the county, SCCCA and its advisory board, and the community.

The SCCCA will issue a request for proposals (RFPs) for qualified professionals who will gather and analyze ratepayer data, and design and administer the program. The county will request and safeguard ratepayer data. (The county routinely and successfully manages proprietary and confidential information from a variety of sources including information about county employees, client information for recipients of several public welfare programs and third party vendors with county contracts.) The SCCCA will also issue RFPs to develop local renewable energy resources over time, to achieve the goal of robust Distributed Energy resources (DER) in Sullivan County. These resources may either be owned by independent energy providers or by the SCCCA. Finally, the SCCCA will ask the county to assist with public outreach, and review quarterly reports to provide oversight of the professional administration of the CCA.

SCCCA and its professional administrators will be responsible for analyzing customer data, maintaining an accurate database of customers and working with the utilities to ensure that billing is fair and accurate and that customer complaints are handled promptly. SCCCA will also be responsible to developing EE programs and identifying the most commercially viable renewable energy assets. As noted above, SCCCA may develop local renewable energy systems itself, or purchase power from commercially developed or consumer-sited renewable assets.

### **Sullivan County is an Appropriate Site for a Demonstration Project**

Sullivan County has demonstrated a strong commitment to GHG reduction, energy efficiency and the development of renewable energy resources by creating an Office of Sustainable Energy, designating a sustainability working group across departments and divisions (Public Works, Planning, Public Health, Procurement and General Services, and Emergency Planning), developing a Climate Action Plan (CAP) that includes ambitious goals for GHG reduction in county operations, and supporting public outreach and education for energy planning at the town and village level. The development of a CCA program for Sullivan County provides opportunities to study the challenges and benefits of a countywide CCA model.

Sullivan County's project will focus on three particular challenges:

**The first relates to seasonal population patterns** and the high percentage of second homes in the county. Statewide, the number of households is equivalent to 89 percent of the total housing stock, but in Sullivan County the number of households accounts for only 60 percent of the housing stock.<sup>1</sup> In part, this can be attributed to the fact that many Sullivan County homes are occupied only on weekends or during the summer, and dual residence homeowners frequently respond to census queries from their primary residences, not their vacation homes. Thus many second homes in Sullivan County are not recorded as "households".

A [2008 study](#) conducted by the Sullivan County Division of Planning found that second home ownership increased by 65 percent between 2001 and 2007 when there were 10,085 second homes in the county. That is equivalent to 21 percent of the total housing stock and 26 percent of the total number of households, including second homes.

This abundance of housing stock in Sullivan County that is only intermittently occupied offers an extraordinary opportunity to reduce grid load by instituting energy efficiency measures such as installing smart thermostats that can act as DER. In this petition, SASD is requesting funding to update the 2007 inventory of housing stock to determine which units are actually vacant and which units are occupied on a seasonal or part-time basis.

In addition to the second homeowners who populate Sullivan County every summer, the county also experiences an influx of tourists, and residents of camps and bungalow colonies. Based upon the best available data, it is estimated that the population of the county more than triples between July 4 and Labor Day. The increased demand for electricity due to increased population coincides with periods of peak demand due to seasonal increased reliance on air-conditioning.

For the above reasons, SCCCA could provide important information about how a CCA that improves energy efficiency and builds out local renewable energy resources can stabilize electric rates and ensure reliability during periods of peak demand in regions with large seasonal changes in population. Reduced grid load in Sullivan County would also ease

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<sup>1</sup> U.S. Census figures for 2009 - 2013 show that New York State has 8,126,026 housing units and 7,234,743 households, while Sullivan County has 49,304 housing units and 29,531 households.

congestion in the adjacent Hudson Valley capacity zone, which is a constrained capacity zone, with what we believe to be unidirectional transmission congestion (upstate to Zone J) during these peak hours.

**Second, Sullivan County is on the cusp of rapid economic development** due the construction of a one billion dollar casino resort and several other large tourist-related projects. These projects alone are on such a scale that they could exert significant pressure on the neighboring capacity zone. Historically, energy costs and grid instability/unreliability have presented serious barriers to economic growth in the county. SCCCA could provide valuable information about how a CCA can employ energy efficiencies and build out energy infrastructure to support an expanding economy.

**Third, full-time Sullivan County residents offer a distinct contrast to the second homeowners referenced earlier, and present a different set of challenges.** According to the 2010 census, 18.2 percent of Sullivan County residents live below the poverty line compared to the statewide rate of 15.3 percent. Low and moderate-income (LMI) full-time residents are more likely to live in older, poorly weatherized housing. More than one half of the county's occupied housing was built before 1970 (per the American Communities Survey), and would benefit from energy retrofits. However, available programs to address these needs are not always a good match for the rural housing conditions common in Sullivan County. For example, many of these structures have crawl spaces or stone foundations that require complex remediation methods that are not covered by Green Jobs-Green NY.

SCCCA will include an analysis of these problems and develop strategies for addressing them. This will align with the REV goals of making energy efficiency retrofits and renewable energy resources more available to low and moderate income New Yorkers.

Sullivan County also has a growing non-English speaking population, including a Hispanic/Latino population that increased from 9.25 percent in 2000 to 13.6 percent in 2010. Effective outreach on CCA will need to address language barriers in this community. We believe the SCCCA will yield valuable information and strategies for energy efficiency and educational outreach for community choice aggregation that could be extrapolated for other rural counties.

## **Local Support for SCCCA**

The project has the unanimous support of the Sullivan County Legislature, which passed Resolution 262-15 in June 2015 and Resolution 349-15 in September 2015 to support SASD's application (attached). We are seeking letters or resolutions of support from Town and Village Boards throughout the county. If the Commission authorizes SCCCA, SASD will launch an extensive educational campaign to build broad-based public support for the program. SASD staff and volunteers will present at Town and Village Board meetings throughout the county and hold public forums in a variety of community spaces.

SASD has already begun building public awareness of CCA by co-sponsoring a public forum featuring Paul Fenn and members of Ulster County's Citizens for Local Power to discuss their CCA process; arranging informational presentations by Sustainable Westchester before the Sullivan County Legislature, and presenting SCCCA to county legislators, town supervisors, village mayors at a September 1<sup>st</sup> Council of Governments meeting of legislators, town supervisors and village mayors at the request of the Chairman of the Sullivan County Legislature. SASD board members and staff have published a number of articles and broadcast radio programs about the subject.

## **Program Design**

Like other CCAs around the country, SCCCA will be an opt-out program that will include both residential and business ratepayers that do not have contracts with energy service companies (ESCOs.) Potential CCA customers will be informed of their right to opt out of the program both through a public outreach campaign and by direct mailing. All potential customers (including consumers already contracted with an ESCO) will be permitted to opt in or opt out of the program without penalty during the first year of operation. SCCCA will endeavor to maintain a policy that permits customers to opt out without penalty at any time but will, at minimum, permit customers to opt out without penalty for one month each year. No customer currently purchasing energy from an ESCO will be solicited to join SCCCA or enrolled in the program by default, but ESCO customers will be permitted to opt into the program.

SCCCA will be designed to both reduce and stabilize the rates that consumers pay for electricity and also to develop DER within the county. The development of DER such as smart thermostats, wind, solar, biomass combined heat and power and hydroelectric power can create good local jobs in an economically depressed region of the state. A countywide CCA can yield other economic benefits as well: money that county ratepayers invest in locally produced power

will stay within the county, and reliance on local energy sources should help to stabilize electric rates over the long-term. The extent to which the cost savings achieved through aggregation will be used to provide consumers with immediate cost savings in terms of lower electric rates, and the extent to which those savings will be used to develop local energy resources will be a subject of public discussion—and one way in which CCA can actively engage the public in the REV process.

Local responsive consumption and local power generation will also reduce transmission loss and grid load. It should be noted that all members of the community, even those who do not participate in CCA, will benefit from greater reliability associated with decreased grid load. In general, the transition to renewable energy sources will also reduce pollution and improve public health.

It is our view that larger-scale businesses, for example G3 customers, should be permitted to participate in SCCCA because it will offer them the opportunity to actively engage in a program that will bring material benefits to the community that they serve. Nevertheless, SASD and Sullivan County are prepared to proceed with SCCCA should the Commission determine that relief from UBP should be limited to residential and “small non-residential customers” and should that be defined by the Commission as “non-demand customers”.

SCCCA will be committed to offering either a default electric rate that is lower than the prevailing rate, or a fixed rate that is lower than the average prevailing rate during the preceding twelve months. Language to this effect is contained in SC Legislative Resolution 349-15, adopted in September 2015. SCCCA may also offer, at a premium, a “light green” energy mix comprised of at least 33 percent renewables, and a 100 percent renewable energy option.

### **Strategies to Reduce Electric Rates**

SASD proposes to utilize the existing capacity Demand-Response (D-R) revenue stream (approximately \$30-40/ kW for four to twenty hours) secured with measured and verifiable Small Customer Aggregation submitted to New York Independent Systems Operators (NYISO) to deploy smart meters and smart thermostats and to perform data analysis research to enhance efficiency savings. SASD intends to submit further Petitions to the Commission, to propose specific tariff changes for homes equipped with remotely controlled smart thermostats. (SASD recognizes that smart meters and smart thermostats are controversial in some quarters

because they are perceived as posing health risks. For this reason, smart meters will only be installed in homes or businesses with the consent of the residents or managers.)

Additionally, beyond this potentially available revenue stream we will seek savings on customer capacity tags by measuring performance of DER resources in random samples, and/or by directly measuring residential DER performance in geographically confined areas (e.g. micro-grids operating in parallel).

The Sullivan County villages of Liberty and Monticello have been awarded NY Prize feasibility studies for micro-grid development. These villages have the county's greatest concentration of low to moderate income families. Each has attractive wind and solar exposure that can be developed for the micro-grids, and this locally generated electricity can be sold into the grid when not in island mode. The synergy between CCA and NY Prize micro grid development provides a robust opportunity to leverage investment dollars and benefit both projects.

### **The Development Process**

As noted earlier, SASD is reaching out to town and village boards to secure letters of support and formal resolutions in support of the SCCCA; however, it is our view that under New York State law a county is a municipality and, as such, has the legal authority to establish a CCA without the explicit approval of every town within its jurisdiction. If the petition to establish SCCCA is approved, we will immediately seek an advisory opinion from the office of the New York State Attorney General (NYS AG) on this matter. If the NYS AG determines that a county cannot create a CCA without the explicit approval of the towns within its jurisdiction, SASD will pursue a multi-municipal CCA at the town level. If it is determined that a referendum is required, Sullivan County will comply with that requirement.

## Sullivan County CCA Preliminary Timeline Month 1 to Launch

TASK	Month 1	Month 2	Month 3	Month 4	Month 5	Month 6	Month 7	Month 8	Month 9
1 Adopt Local Law	█	█							
2 Establish SCCCA as a legal entity			█						
3 Request aggregate data from utilities			█						
4 Develop/Award RFP for contractor to design/manage			█	█					
5 Develop/issue RFPs for ESCOs/PPAs					█				
6 SCCCA signs contract for ESCO/PPA						█			
7 Notify customers re opt-out							█		
8 Request customer data from utilities								█	
9 Launch SCCCA									█
10 Inventory renewable resources	█	█	█	█	█	█	█	█	█
11 Public information/education campaign	←	█	█	█	█	█	█	█	→

**Month 1- Month 2** Upon authorization, Sullivan County will adopt a local law authorizing the creation of SCCA. (Task 1)

**Month 3** SCCCA will be set up as a legal entity. (Task 2)

**Month 3** Sullivan County will request aggregated consumer data from NYSEG, Central Hudson and Orange & Rockland, the three utilities delivering electricity to customers in Sullivan County. SASD requests that the utilities be required to provide this information within thirty days. (Task 3)

**Month 3—Month 4** SCCCA will immediately begin work to develop a request for proposals (RFPs) inviting contractors to submit proposed terms of service contracts that may include project design, data analysis, and legal work. All contracts will be awarded by the SCCCA in accordance with best practices in procurement policy. (Task 4)

**Month 5** SCCCA will develop and issue RFPs to ESCOs and evaluate proposals for Power Purchase Agreements (PPA). All PPAs may require ESCOs to seek to buy competitively priced, locally produced power and to offer customers a greener energy mix and one hundred percent renewable energy at a premium. (Task 5)

**Month 6** Contracts with an ESCO (or ESCOs) are to be signed within six months of the granting of this petition. (Task 6)

**Month 7** Once the terms of the PPA are known, potential SCCCA customers (county ratepayers without ESCO contracts) will be notified through a communication from SCCCA by direct mail that they will be bundled into the CCA unless they choose to opt out without penalty within thirty days. Opt-outs will be accepted either by phone, online or by mail. (Task 7)

In order to help the potential customers make informed choices, they will be provided with information about past and prevailing electric rates, including the rates offered by SCCCA for various fuel choices as described elsewhere in this petition.

It is our intention to maintain a no-penalty opt-out policy throughout the life of the CCA, but if there are to be any late-stage exit costs (cancellation fees), they will be disclosed along with all other information deemed to be pertinent by SCCCA and/or the Commission. With Commission authorization, customers will receive this information by way of one-page (or 1,000 character) inserts included with customer's monthly utility bills. The cost of such inserts is included in the proposed budget accompanying this petition. Customers with online accounts with the utilities will receive this information online at no cost to SCCCA.

**Month 8** Five days after the thirty day opt-out period expires, the utilities will provide (via Electronic Data Interchange) account numbers, service addresses, and precise consumption data, including capacity tag obligations, for all SCCCA customers who have not affirmatively opted out of the program, to the SCCCA's designated ESCO. This information will be protected by the ESCO's current data protection policies, including cyber insurance. The timing of the above-outlined process is designed to ensure that all required information is in place for the next step to succeed, without requiring utilities to provide any personally specific or identifying information prior to notification of all individuals that they may preserve privacy through opting out of the process. (Task 8)

**Month 9** SCCCA implements the program. (Task 9)

**Month 1—Month 9** SASD will work with the SCCCA to assess the opportunity to achieve demand-side savings, and to complete an inventory of renewable energy resources in the county. (Task 10)

A countywide survey of wind resources undertaken in 2005 identified five possible sites for medium scale wind farms. A subsequent USDA-funded study further advanced these projects by completing preliminary designs for a 4MW wind farm, and a 2MW wind turbine as part of a proposed energy district project. The site for the 2MW turbine is well-situated on county-owned land and could be readily developed as an SCCCA-owned renewable asset. The 4MW site is on private land and the owners of the site signed a letter of interest in seeing the project go forward. This site could be developed as either a public-private partnership, or commercially developed to provide SCCCA with local, sustainable energy.

A 2014 inventory of county-owned land identified sites capable of producing 7.05 MW of solar electric. SCCCA will need to complete a broader inventory of all possible sites within the county suitable for medium-scale solar farms, small-scale hydro, and the biomass combined heat and power (CHP) resources of our largely agricultural county.

It is our view that this energy inventory can be undertaken without SEQR, but SASD will contact the New York State Department of Environmental Conservation as well as consult with private legal counsel for an opinion on this matter.

**Ongoing** Our effort to build interest in, and promote awareness of CCA will be robust and ongoing. It will include educational forums around the county and presentations before town boards and in other public venues. SASD's public awareness campaign will continue with ongoing presentations and forums to educate the public about energy issues and promote sustainable energy policies. (Task 11)

### **Additional Terms and Conditions**

1. We respectfully request that all data being provided by utilities be provided at no cost to the SCCCA, or at no more than 7 cents per record.
2. While it is our intention to minimize access to customer information, the SCCCA administrator may request and retain a list of customers. All personnel with access to this data will be required to sign confidentiality.
3. SCCCA will comply with all applicable New York State Public Service Law and regulatory requirements including but not limited to the Home Energy Fair Practices Act and the implementing regulation, 16 NYCRR Part 12.

4. SASD requests that the SCCCA be approved for a 4-year term. This will provide sufficient time to bring local, renewable energy systems online and to institute energy efficiencies.
5. Administrative fees of the SCCCA will be limited to up to one tenth of a penny per kilowatt hour (kWh) to cover day-to-day operations, including legal fees and communications. We request that SCCCA also be permitted to apply a portion of these monies to the RR/EE Fund.
6. SASD also requests permission for SCCCA to impose other fees so long as they do not interfere with the ability of the CCA to provide consumers with electricity that is priced below the prevailing rate or below the average prevailing rate during the preceding twelve months.
7. If the Commission provides relief from Uniform Business Practices related to allowing an opt-out approach to CCA, and if the Commission directs the utilities to provide the necessary data, then SASD and Sullivan County will proceed with the program.

### **Service Operations**

Throughout the life of SCCCA, the program administrator will continue to monitor the electric rates, both those offered by the CCA and those offered by regional utilities. As prescribed by the purchase agreements with ESCO(s), prices will be adjusted to reflect market conditions and to ensure that CCA rates remain competitive. As noted earlier, any set-asides for a RR/EE Fund will, if need be, adjusted downward or cancelled altogether to ensure that SCCCA electric rates remain competitive with the prevailing rate offered by the regional utility.

The program administrator will ensure that the charges for electricity on utility bills and customer payments are both accurate. The administrator will provide customer support and resolve customer complaints regarding the CCA portion of utility bills.

### **Revenue Streams**

This application has identified four revenue streams that could be used to fund SCCCA.

1. We will work with our three local utilities (NYSEG, Orange & Rockland and Central Hudson) to develop demand-response programs to deploy smart thermostats and smart meters.
2. A one tenth of a penny per kWh set aside to fund CCA administration and the RR/EE Fund.

3. Additional surcharges (that do not interfere with the ability of SCCCA to provide customers with favorably priced electricity) to fund DER, EE and RE development.
4. We are asking the three utilities that serve Sullivan County to fund the following development costs totaling \$325,215 in Year 1 from the funds they have set aside for such programs.

### **Funding Request and Budget**

SASD will ask the three utilities operating in Sullivan County to fund the following development costs of SCCCA from the funds they are required to set aside for such programs.

#### **Budget**

Project Management	\$78,000
CCA Planning and Development Consultants	75,000
Legal	7,500
Community Forums (20) and Town Meetings (21)	10,500
Website Development and Maintenance	5,000
Printed material for outreach	3,000
Updated Inventory of housing stock	10,000
Inventory of in-county renewable energy resources	8,000
Aggregated Electric Usage Procurement	3,500
Customer Electric Usage Data	29,250
Analyze Electric Usage Data	40,500
Data Hosting and Cyber Insurance	14,400
Direct mailing 50,000 postcards (including printing and postage)	8,000
Travel including airfare for consultants and mileage allowances	4,800
Office Supplies, Telephone	1,200
<u>Contingency (10%)</u>	<u>27,065</u>
<b>Total Costs</b>	<b>\$325,215</b>

### **Notes on the Project Plan, Funding and Budget**

SASD and Sullivan County are seeking authorization and funding for certain aspects of SCCCA, but are prepared to continue developing the SCCCA even if these requests are denied. We are developing strategies to enable us to proceed.

- It is our intention to develop the CCA even if the Commission does not permit the insertion of SCCCA communication material into monthly utility bills.
- If the three utilities (NYSEG, Orange & Rockland and Central Hudson) serving Sullivan County decline the request for start-up costs, it is likely that a single contract will be awarded to a developer/administrator willing to perform the work in anticipation of future profits derived from the sale of electricity.

- Administrative fees of the SCCCA will be limited to up to one tenth of a penny per kilowatt hour (kWh) to cover day-to-day operations, including legal fees and communications.
- We request that SCCCA also be permitted to apply a portion of these monies to the RR/EE Fund, but will proceed with the pilot even in the event we are not granted this flexibility.
- To help achieve renewable energy and energy efficiency goals, the SCCCA will include a SCCCA-administered Renewable Resources/Energy Efficiency (RR/EE) Fund that earmarks a portion of the cost savings achieved through aggregation to accomplish these goals. If market conditions permit, surcharges may be imposed to fund the build out of local, renewable energy systems and to fund the installation of energy efficiency upgrades and systems. These surcharges will not be permitted to interfere with SCCCA's commitment to launch offering an electric rate that is less than the prevailing rate, or is fixed below the average rate during the preceding twelve months.

Respectfully submitted,



Carol Roig                      Stephen Stuart  
Co-Executive Directors, Sullivan Alliance for Sustainable Development (SASD)  
October 1, 2015

**Attachments:**

Appendix A: More about SASD  
Appendix B: Sullivan County's Steps toward Sustainability  
Resolution 262-15: County Resolution in Support of SASD's application to the PSC  
Resolution 349-15: County Resolution in support of SASD's application to the PSC  
Town of Highland Resolution 76-2015 in support of SASD's application to the PSC  
Town of Tusten Letter of Support for SASD's application to the PSC  
Catskill Citizens for Safe Energy Letter of Support

**HYPERLINKS**

<http://webapps.co.sullivan.ny.us/docs/dpem/resources/secondhomeownerstudy.pdf>

## **Appendix A: More about SASD**

Our mission is to promote a new standard for mindful development that is environmentally responsible, socially equitable and economically just; to inspire the residents of Sullivan County to embrace the principles and practices of sustainability as personal and civic values; and to make energy efficiency and renewable energy accessible for all. We pursue our mission by guiding energy and sustainability policy at the municipal and regional level; initiating and advocating for renewable energy projects and energy efficiency for residential, commercial and municipally-owned buildings and facilities; researching and disseminating information on building science, state of the art energy technologies and new funding and investment mechanisms to the general public and to municipal and civic leaders.

**Policy Initiatives and Energy Projects:** SASD has facilitated solar installations at two County facilities and the development of a comprehensive Climate Action Plan for addressing the causes and impacts of climate change, which was adopted by the County legislature in 2014. In 2015, SASD is also working with six Sullivan County towns to develop individualized energy and climate action strategies through the Climate Smart Communities Program, and continues to recruit additional towns and villages to participate in the program. Most recently, we guided the County through its first Power Purchase Agreement for a 2MW solar installation, and worked with the global engineering firm Booz Allen Hamilton to develop proposals for micro grid demonstration projects in Liberty and Monticello. The micro grid projects have been approved for funding for feasibility studies through the New York Prize program. SASD identified critical infrastructure, convened meetings of key stakeholders, gave informational presentations to town and village boards, and secured letters of support from potential participating institutions and town, state and national leaders.

All of these projects involve deep cooperation among a range of stakeholders. For example, the Sullivan County Climate Action Plan represents collaboration between SASD and various legislators, town and village officials, and County divisions and departments, including the Divisions of Planning and Public Works, the Departments of Purchasing and Central Services, Public Health Services, and Emergency Management/Homeland Security. Fifteen community leaders with broad professional experience served on the Sullivan County Climate Action Planning Advisory Board, which met monthly for more than a year to establish policies and goals. SASD is experienced at convening and managing collaborative efforts on the scale of the proposed Sullivan County CCA.

SASD's advocacy, counseling and outreach efforts have helped attract more than \$4.5 million to Sullivan County that has been invested in sustainable energy projects including feasibility studies, energy audits and retrofits, and wind, solar electric and solar-thermal installations. SASD has also helped secure more than \$1.6 million in federal funding to help schools, small businesses and farms install photovoltaic systems. In addition to generating economic activity at the local level, these projects have helped reduce GHG emissions and achieve substantial energy cost savings for Sullivan County stakeholders.

In 2010-2012 SASD conducted a countywide survey of potential sites for medium scale wind farms and in 2013-2014, assembled an inventory of County-owned properties with significant solar resources.

**Education and Outreach:** SASD's staff and board members have professional expertise in building science, renewable energy systems, environmental policy, finance, emergency planning, communications, and public information campaigns. SASD's outreach has included scores of free forums, workshops, presentations to town boards and citizen groups, publications, and promotion of free home energy audits and residential energy retrofits through NYSERDA. In February 2014, SASD's Climate Change Symposium brought together artists and scientists from many disciplines to explore positive actions to reduce the impact of climate change.

## **Appendix B: Sullivan County's Steps toward Sustainability**

Sullivan County has been working since 2005 to establish environmentally responsible policies and practices in County operations and to provide information and technical guidance to towns, villages and the general public. Major benchmarks in this process include:

**2005** The Sullivan County Division of Planning and Environmental Management introduced the Sullivan 2020 initiative and published the Sullivan 2020 Toolbox, which addressed needs, set goals and objectives, and outlined best practices for land and water use, farmland protection, forestry, zoning, parks and recreation, information technology, composting, recycling, emergency management, housing, historic preservation, revitalization of villages and hamlets, diversification of agriculture, workforce development, tourism, arts and cultural development, facilities planning, health and human services, and education.

The county commissioned a study of wind resources by Sustainable Energy Developments, of Ontario, NY. The study, entitled Market Assessment for Wind Energy in Sullivan County, NY, is available on the SC Division of Planning and Environmental Management web page.

**2007** The County Charter was amended to “follow and adhere to sustainable energy and sound environmental principles and processes in all of its policies and operations.”

The county legislature adopted Resolution 429-07, the County's *Green Vision Statement*, which included commitments to:

- Promote energy efficiency and resource conservation by requiring future County facilities to meet LEED or equivalent sustainable principles, practices and technologies.
- Provide technical assistance and education to municipalities regarding green building standards, renewable energy, and other best practices.
- Operate county buildings in a sustainable manner, conduct regular energy audits, decrease energy needs, increase energy efficiency, encourage alternative energy production.
- Establish benchmarks for measuring the County's progress on sustainability goals, review the benchmarks annually and modify them to reflect progress and appropriate changes.
- Develop incentive programs with the Sullivan County Industrial Development Agency (IDA) to encourage sustainable industries and projects.

- Coordinate with the Sullivan County Division of Health and Family Services to identify areas where environmental health and sustainable practices can be incorporated into their mission, educational programs and service delivery plan.

**2008** The county adopted Resolution 343-08 directing the County Manager to establish an Office of Sustainable Energy (OSE) to:

- Develop administrative directives to reduce the County’s energy consumption in all county facilities, and those policies shall assist the county with the realization of maximizing the potential savings in utility costs, and to reduce the county’s overall carbon footprint.
- Recommend measures for renewable energy generation for County facilities.

**2009** The county installed a 15kW photovoltaic system at the Mobility Management Center in the Town of Bethel, New York.

The County established a Sustainability Policy Committee through L.L. No. 8-2009 to address:

- Sustainable principles, practices and technologies in future county facilities.
- “Green” building standards, renewable energy, and other “best practices.”
- Sustainable policies in current county facilities.
- County fleet review of hybrid and alternative fuel vehicles.
- Environmental health and sustainable practices of the Department of Public Health.
- Benchmarks for measuring progress on sustainability goals.
- Oversight of external education of sustainability policies.

The legislature adopted Resolution 225-09 to contract with Sullivan Alliance for Sustainable Development (SASD), a County-based 501(c)(3), to provide consultation to the Sullivan County Office of Sustainable Energy (OSE) on energy management and sustainability policy for further implementation of the County’s “Green Vision.”

**2010** The county adopted Res. 53-10, the *Climate Smart Communities Pledge*, and subsequently joined the International Council for Local Environmental Initiatives (ICLEI), now known as ICLEI- Local Governments for Sustainability.

**2011** SASD launched an in-depth analysis of County buildings and facilities and review of existing energy audits to identify cost saving measures; began a County-wide information

campaign for Green Jobs-Green NY home energy audits and retrofits through NYSERDA, funded through the American Recovery and Investment Act; and SASD staff co-chaired the MidHudson Regional Sustainability Planning Consortium Energy Working Group.

**2012** SASD presented a *Roadmap for Climate Action Planning for Sullivan County*, outlining a rationale and work plan for fulfillment of County Resolution 53-10, the Climate Smart Communities Pledge. The Legislature subsequently adopted Res. 140-12 to create the *Climate Action Planning Advisory Board*, and appointed 15 Sullivan County residents to serve on the Board, with administrative support from SASD.

The County installed a 49.92kW photovoltaic system at the Robert B. Travis Building on the County's Public Health campus in Liberty New York. During its first year of operation the system produced 80,000 kWh of electricity and saved the County \$8,000 in electricity costs

**2013** The county legislature's Agriculture and Sustainable Policy Committee approved the formation of an informal "Interdepartmental Sustainability Working Group" to collaborate on the development of shovel-ready projects to reduce greenhouse gas (GHG) emissions in county operations while addressing the pressing needs of the County Department of Public Works. The Working Group includes staff of the Divisions of Public Works and Planning, the SC Department of Grants Administration, and staff of SASD acting as advisors.

SASD assembled an inventory of County-owned properties with significant solar resources.

**2014** The County legislature voted unanimously to accept the Sullivan County Climate Action Plan, which sets specific targets for GHG reduction in county operations and outlines specific goals and strategies for energy, transportation, materials management, land and water use, emergency management and public health.

The County signed an agreement with Solar City to develop a 2MW solar installation through a Power Purchase Agreement (PPA) at the County's Public Health and Community Services campus in Liberty.

**2015** The county passed 2 resolutions in support of SASD's application and petition to the PSC to form a countywide CCA as a demonstration project under the PSC's REV initiative.

**RESOLUTION NO. 262-15 INTRODUCED BY THE EXECUTIVE COMMITTEE TO SUPPORT SASD'S APPLICATION TO THE PUBLIC SERVICE COMMISSION TO DEVELOP A DEMONSTRATION PROJECT FOR COUNTY- WIDE COMMUNITY CHOICE AGGREGATION (CCA) FOR RESIDENTIAL AND COMMERCIAL ELECTRICITY PURCHASE.**

**WHEREAS**, the Public Service Commission (PSC) of the State of New York has issued a call for demonstration projects that will be an important step in implementing Reforming the Energy Vision (REV); and

**WHEREAS**, Community Choice Aggregation (CCA) is a platform that allows for aggregating electric consumers to seek bulk power purchase rates; and

**WHEREAS**, the County of Sullivan is familiar with the rate savings that can be achieved through energy aggregation because of the County's participation in the Municipal Electric and Gas Association (MEGA); and

**WHEREAS**, CCA holds the potential to lower residential and commercial electric rates; and

**WHEREAS**, locally produced clean energy from solar, wind, biomass and micro hydro can help develop a clean energy economy for Sullivan County; and

**WHEREAS**, Sullivan County is on the cusp of major economic growth with projects such as the Adelaar Resort and Montreign Casino, and Veria Life Style and it is anticipated that this expanded economic growth will also animate the second home market in Sullivan County; and

**WHEREAS**, this expanded growth in the Sullivan County economy will require additional electric generation capacity; and

**WHEREAS**, Sullivan Alliance for Sustainable Development (SASD) has the desire and capacity to move a CCA application to the Public Service Commission; and

**WHEREAS**, Sullivan County intends to explore the pros and cons of implementing a Local Law to authorize CCA formation on a county-wide basis

**NOW, THEREFORE, BE IT RESOLVED** that the Sullivan County Legislature supports SASD's application to the PSC and for SASD to be the initiating organization.

**BE IT FURTHER RESOLVED** that this action will hold Sullivan County Legislature free from incurring any expense of this application.

**BE IT FURTHER RESOLVED** that SASD will return to the Sullivan County Legislature in one month's time to present specific actions requested of the County, and upon consideration of these specific facts the Legislature shall provide a clear indication of its commitment to the program, subject to all legal requirements.

**Moved by Mr. Benson, seconded by Ms. Vetter., put to a vote with Mrs. Gieger absent, unanimously carried and declared duly adopted on motion June 18, 2015.**

**RESOLUTION NO. 349-15 INTRODUCED BY THE EXECUTIVE COMMITTEE TO SUPPORT SASD'S APPLICATION TO THE PUBLIC SERVICE COMMISSION TO DEVELOP A DEMONSTRATION PROJECT FOR COUNTY- WIDE COMMUNITY CHOICE AGGREGATION (CCA) FOR RESIDENTIAL AND COMMERCIAL ELECTRICITY PURCHASE.**

**WHEREAS**, the Public Service Commission (PSC) of the State of New York has sought demonstration projects to enable it to implement the Governor's Reforming the Energy Vision (REV); and

**WHEREAS**, Community Choice Aggregation (CCA) is a program that allows for aggregating electric consumers to seek bulk power purchase rates; and

**WHEREAS**, the County of Sullivan is familiar with the rate savings that can be achieved through energy aggregation because of the County's participation in Municipal Electric and Gas Association (MEGA); and

**WHEREAS**, the Legislature believes CCA programs have the potential to lower residential and commercial electric rates throughout the county; and

**WHEREAS**, Sullivan Alliance for Sustainable Development (SASD) has prepared a CCA application for submission to the Public Service Commission and has sought the Legislature's willingness to participate in a county-wide pilot project; and

**WHEREAS**, on June 18, 2015 the Legislature adopted Resolution 262-15, which provided the opportunity for SASD to present the specific details of its proposed application, and SASD has now done so.

**NOW, THEREFORE, BE IT RESOLVED** that the Sullivan County Legislature supports SASD's application to the PSC for a county-wide CCA pilot; and

**BE IT FURTHER RESOLVED**, the County of Sullivan shall not incur any expense in relation to SASD's application before the PSC; and

**BE IT FURTHER RESOLVED** that if an electric rate that is lower than or equal to the average last twelve month rate cannot be negotiated through the Sullivan County CCA, that this resolution shall be null and void; and

**BE IT FURTHER RESOLVED** that, upon the PSC's approval of SASD's application, the Legislature shall, subject to legal authority and requirements, undertake its obligations to pursue a CCA program in the County, including the request for necessary data from utilities, the passage of a local law and assistance with the creation of a CCA corporate entity; and

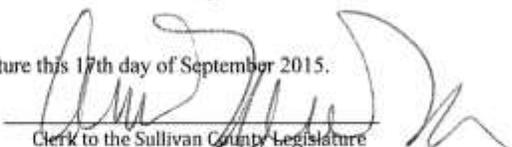
**BE IT FURTHER RESOLVED** that, upon approval of the SASD application, the County Manager is hereby authorized to sign agreements to bring the CCA to fruition, subject to approval by the County Attorney's office.

Moved by Mr. Benson, seconded by Mr. Sorensen, put to a vote with Mrs. Gieger and Mrs. Edwards absent, unanimously carried and declared duly adopted on motion September 17, 2015.

COUNTY OF SULLIVAN )

I, ANNMARIE MARTIN, Clerk to the Legislature of the County of Sullivan, do hereby certify that I have compared the foregoing copy of a resolution with the original thereof now on file in my office and that the same is a correct transcript therefrom and of the whole of said original.

WITNESS my hand and seal of said Legislature this 17th day of September 2015.

  
Clerk to the Sullivan County Legislature

**RESOLUTION 76-2015**

THE TOWN OF HIGHLAND TOWN BOARD on September 8, 2015  
At the Regular Town Board Meeting the Town Board authorized the following:

WHEREAS, the Public Service Commission (PSC) of the State of New York has issued a call for demonstration projects that will be an important step in implementing Reforming the Energy Vision (REV); and

WHEREAS, Community Choice Aggregation (CCA) is a platform that allow for aggregating electric consumers to seek bulk power purchase rates; and

WHEREAS, CCA holds the potential to lower residential and commercial electric rates, which will provide a significant benefit to residents and business owners in the Town of Highland; and

WHEREAS, locally produced clean energy from solar, wind, biomass and micro hydro can help develop a clean energy economy for Sullivan County; and

WHEREAS, Sullivan Alliance for Sustainable Development (SASD) has the desire and capacity to move a CCA application to the Public Service Commission  
NOW, THEREFORE, BE IT RESOLVED that the Town of Highlands supports SASD's application to the PSC for a county-wide CCA and for SASD to be the initiating organization.

Motion Councilman Scott Hallock, seconded by Councilman James Gutekunst motion carried all ayes.

Supervisor Andrew Boyar	Aye
Councilman James Gutekunst	Aye
Councilman Fred Bosch	Aye
Councilman Scott Hallock	Aye
Councilman Jeff Haas	Aye

Motion carried, all ayes.

I, Doreen Hanson Town Clerk of the Town of Highland, do hereby certify that this is a true copy of the resolution passed by the Town of Highland Town Board.

September 8, 2015

*Doreen Hanson*

Doreen Hanson, Town Clerk





**Office of the Supervisor  
Town of Tusten  
210 Bridge Street  
P.O. Box 195  
Narrowsburg, NY 12764  
(845)252-7146 ext 1000  
Fax (845) 252-7509  
supervisor@tusten.org**

September 29, 2015

Hon. Kathleen H. Burgess  
Secretary to the Commission  
NYS Public Service Commission  
Three Empire State Plaza  
Albany, NY 12223-1350

Dear Secretary Burgess:

I am writing on behalf of the Town Board of the Town of Tusten in Sullivan County to express our support for the petition of Sullivan Alliance for Sustainable Development (SASD) to establish a Community Choice Aggregation (SCCCA) program in Sullivan County.

We understand that the SCCCA will achieve the following:

- Aggregate residential and commercial electricity users,
- Negotiate lower electricity prices for County residents and businesses,
- Foster the development of local renewable energy generation, and
- Facilitate implementation of smart technologies to help residents and businesses operate more efficiently.

We embrace the goals of SCCCA as vital to the health and prosperity of our residents and businesses. We believe it is very important that the SCCCA be a county-wide initiative, and that the County lead the way by serving as the aggregator in order to secure the broadest participation and most advantageous negotiating position on behalf of all ratepayers in the County. [We will be interested in participating in the SCCCA for our municipal operations.]

We look forward to working with SASD and Sullivan County to create the SCCCA, and we urge the Public Service Commission to approve SASD's application and work with us to ensure a successful CCA for Sullivan County.

Sincerely,

Carol Ropke Wingert, Supervisor  
Town of Tusten



PO Box 103  
Fremont Center, New York 12736

September 12, 2015

Hon. Kathleen H. Burgess  
Secretary to the Commission  
NYS Public Service Commission  
Three Empire State Plaza  
Albany, NY 12223-1350

Dear Secretary Burgess:

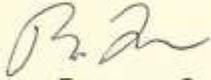
Catskill Citizens for Safe Energy is an all-volunteer grassroots organization with 15,000 members headquartered in Sullivan County, New York. It supports the American Clean Energy Agenda as part of its mission to promote 100% sustainable energy for all Americans.

Catskill Citizens enthusiastically supports the petition submitted on behalf of the Sullivan County Legislature seeking authorization for a countywide Community Choice Aggregation (CCA) demonstration program. Our support is based on our belief that the proposed program not only has the potential to reduce the cost of electricity for small businesses and residential customers, but will also promote the use of renewable energy in the county, and, by way of example, the entire state. This in turn will help both the county and New York State meet their stated goals of reducing greenhouse gas emissions.

We urge the Commission to permit a Sullivan County CCA to set aside a portion of the cost savings it achieves through aggregation to fund the build out of local renewable energy resources and to institute energy efficiencies. These measures will relieve grid load, decrease reliance on polluting fossil fuels, and stimulate economic activity in a county that has typically lagged behind much of the rest of the state in job creation and *per capita* income. Importantly, community-owned, local power generation will help insure that the money customers spend on utilities will stay within the county.

Community-controlled, decentralized, renewable energy production is consistent with New York's Reforming the Energy Vision, the mission of Catskill Citizens for Safe Energy, and the American Clean Energy Agenda.

Sincerely,

A handwritten signature in black ink, appearing to read 'B. Ferguson', written in a cursive style.

Bruce Ferguson, Co-Director