October 19, 2009

**COM MENTS REGARDING DRAFT NEW YORK STATE ENERGY PLAN FROM GREENLOGIC ENERGY**

Thank you for the opportunity to submit GreenLogic Energy's comments on New York State's draft Energy Plan. GreenLogic Energy is a value-driven, New York-based renewable energy integrator offering best-in-class alternative energy solutions, world-class customer service and triple bottom line business results for a variety of clients throughout Nassau, Suffolk and Queens, with headquarters in in Southampton and offices in Roslyn and several other Long Island locations.

According to research firm New Energy Finance, governments have spurred much of the growth in renewable energy implementation through a myriad of policy tools such as tax programs, subsidies, renewable portfolio, and technological standards. That this fact is very much the opportunity now at hand for NYS leadership is underscored by the credible work of Alliance for Renewable Energy (ACE) and Renewable Energy Long Island (RELI) on the topic of enhancing renewable energy policy in our state. We reiterate their positions that New York State must take immediate, real, actionable, measurable, and accountable steps to deliver on the promises of a renewable future.

In the company of our esteemable colleagues, GreenLogic submits seven key inputs for New York State's consideration in developing its energy plan.

1. **MANDATE RENEWABLE ENERGY IMPLEMENTATION**

- **First, if New York is to achieve the level of applaudable energy goals set forth by the Governor in previous pronouncements, we believe it is crucial to establish policies and mandates, to the degree possible and where such control exists, for specific renewable energy implementation targets.**

According to Clean Edge research, "the alignment of economic, political, and environmental interests is catalyzing an industry-wise revolution which will re-engineer the way energy is generated, transmitted, bought/sold, and consumed." Given that policy mandates are the single most significant contributor to renewable energy growth in our country at the present moment, it is clear that New York State, where possible, must mandate targeted rates of

renewable energy generation at public sites where state control and oversight exists.

New York's energy plan is especially crucial to that growth and we believe the state should adopt more rigorous policies that not only suggest but also mandate strides in renewable energy implementation, where state oversight and control exists in this regard. For example, we believe New York State should consider requiring all schools, public agencies, public facilities such as hospitals and community centers, as well as county and local municipal offices to implement RE projects that reduce conventional energy consumption by specific measurable amounts. We believe that reduction amount should be on the order of 8-12 percent annually for the next 10 years so that by 2020, all state buildings will effectively "zero out" their conventional energy usage.

2. **ALLOCATE RENEWABLE ENERGY FUNDING THAT SUPPORTS LOCAL UTILITY INCENTIVES**

- **Second, we believe incentives for renewable energy at the local utility level must remain in place at robust levels for the near term and that NYS should consider funding some part of these in order to ensure their viability.**

Thanks to a generous and ongoing commitment to renewable energy by our local utility, LIPA has one of the most successful customer sited programs in the country, as evidenced by the 2000-plus installations that have occurred thus far on Long Island. Yet managing to fluctuations in LIPA's rebate program creates one of the largest operational challenges for our company.

Each time GreenLogic confronts a decision regarding investing in our business (bringing onboard incremental staff, purchasing additional vehicles, formulating new manufacturing partnerships), we must always ponder whether LIPA's program will still be in force, which directly impacts our ability to grow, hire, and guarantee the sustainability of our business and commitment to serving the renewable energy needs of Long Islanders.

We recommend New York State consider a funding commitment to guarantee that the incentive program has certainty for at least the next five years so that consumers can continue to rely on this source in their renewable energy purchasing decisions.

3. **EMPHASIZE CUSTOMER-SITED RENEWABLE ENERGY DISTRIBUTED GENERATION**

- **Third, we believe a greater concentration of distributed-generation programming will serve to grow the amount of renewable energy utilized and thus be directly translatable into a sustainable Long Island green economy.**

The value of utility-scale generation notwithstanding, the more distributed generation power sited at customer locations, the more renewable energy watts we install and therefore the more jobs we create. Given its density and relatively new construction, Long Island has an abundance of available distributed generation locations on rooftops across our region and state policies should underscore this methodology going forward. By definition, distributed generation allows far more participation by smaller and medium-sized integrators, given that this scale is within the financial capabilities of more companies, including the size of GreenLogic.

In addition to more extensive company participation, distributed generation solutions offer other potential benefits. For example, distributed generation is more secure, allows for greater reliability and more flexibility in managing peak demand, offers less loss of power through transmission, promotes more engagement of property owners in their individual energy futures, delivers greater exposure to renewable energy, and ultimately leads to greater use, acceptance, and adoption of environmentally friendly energy solutions.

4. **UTILIZE NABCEP-CERTIFIED EXPERTISE, THE INDUSTRY GOLD-STANDARD**

- **Fourth, NYS must closely analyze the quality of work performed at its public sites and insist that all installations at these locations be overseen by NABCEP-certified experts.**

NABCEP (North Americann Board of Certified Energy Professionals) is the gold-standard of quality control. Certification requires considerable hours in training and education and assures the integrity, safety and security of installed renewable energy systems, which enhances the well-being and peace of mind of public clients and consumers. Currently, no such requirement exists within LIPA and RELI territories, which potentially jeopardizes the quality of project installation as well as the relatively nascent reputation of the renewable energy industry.

5. **SOURCE LOCALLY**

**Fifth, to the greatest extent possible, large renewable utility scale projects should be sourced and executed by Long Island resources or at minimum New York-based (and certainly U.S.-domiciled) organizations**.

Large-scale renewable projects are to be applauded, but those that are executed by foreign multinationals do very little to enhance our state and/or local economy and help us build our own industry of non-exportable jobs. GreenLogic Energy estimates that for every one MW of renewable energy installed, our company adds approximately 30-40 jobs, half of which are professional positions. The possibilities for job growth through sourcing locally are enormous.

GreenLogic recommends that when state and local entities do engage in utility scale projects, bidders should be required to comply with a variety of standards, including stipulating that at least 70 percent of jobs to be filled locally. This would advantage economic development in the region and contribute greatly to building New York's indigenous renewable energy capabilities vs. shipping highly desired, well-paid job opportunities, intellectual capital, and competitive work product to large, non-New York and even foreign multinational companies.

6. **TAP REGION-SPECIFIC R&D EXPERTISE**

**Sixth, New York State ought to leverage a jewel in its the crown: Long Island's incomparable legacy of high-technology research and development**.

Job creation in the realm of manufacturing in upstate New York is a worthy endeavor and certainly carries on a great industrial tradition that harkens to our state's roots in heavy production. Taking that one set further, collaborations between upstate manufacturers and regional integrators have the potential to create the ultimate model in build local/buy local. At the same time, the case must be made that exponentially greater numbers of jobs can be created over the longer term that are not limited by fixed costs, product competitiveness, price sensitivities and the potential for outsourcing. When it comes to renewable energy, substantial economic development can be achieved in New York through a concerted effort to build expertise in the design, sale, service, installation, and support aspects of the industry at local levels throughout the state.

To that end, we believe greater investments in renewable energy education through grants allocated to employers hiring and training renewable energy workers will serve to create a deeply educated, ready-for-action workforce and management bench, as well as a much more aware consumer.

The longer-term benefits of this action to New York State will accrue from locally filled and trained jobs that demand experienced skill sets, provide opportunities for advancement, cannot be exported, produce knowledge workers who will spend, live and invest locally, and can be monetized in the form of consulting assignments against locally acquired intellectual capital. This move will help to create a more competitive workforce and allow New York-based companies to participate in all ranges of the renewable energy competitive procurement processes.

Moreover, with SUNY Stony Brook and other noted research institutions and business education centers located here on Long Island, we believe state investments in renewable energy R&D in our own backyard – just as industry, federal and state government invested in Long Island's aerospace industry in prior decades -- will serve New York's economic needs well.

According to Alice Rush, author of Green Careers: Choosing Work for a Sustainable Future, some of the greatest opportunities for career growth today

are found within green companies leveraging stimulus at the national, state, and local levels. "There are plenty of opportunities for employees with all levels of skills, from all kinds of backgrounds, in the green industry. Companies that build to that will have a hand in creating the green army of the future," says Ms. Rush.

Indeed, New York State's Energy Plan could contribute greatly to our region's immediate employment recovery, putting to work thousands of skilled professionals and technicians across the state. To the degree that sustainable energy solutions stimulate demand for a highly skilled workforce trained in the design, development, management, financing, marketing, installation, permitting and ongoing care of environmentally sensitive new technologies and services, we are collectively building THE renewable economy of the future.

7. **INVEST IN MORE CONSUMER EDUCATION AND PROMOTION**

**Seventh, we believe broader consumer education and promotion of New York's sustainable energy goals, plans and programs is necessary to continue to educate greater numbers of taxpayers, residents, business owners and all potential RE users and decision-makers.**

New York State could take the lead in designing and kicking off a comprehensive communications effort that would seek to educate both government and public sector users and private sector consumers in the benefits of renewable energy of all types. Solar PV is usually the first consideration for most consumers. However, many neighborhoods are now drawing up guidelines for wind energy generation. What's more, there is increasing interest in solar thermal and geothermal technologies. However, more efforts are required to educate government and municipal leaders and consumers in the range of renewable energy choices.

Ad campaigns, web-based initiatives, public service programming, school-driven events, and news coverage of the benefits and ease of implementing renewable energy will go a long way towards stimulating action**.**

## ABOUT GREENLOGIC ENERGY

Thanks to a robust partnership with Long Island Power Authority, a laser-focused business plan and highly skilled implementation, GreenLogic Energy has grown to become one of Long Island's fastest growing and largest installers of renewable energy systems. With headquarters in Southampton, New York, a large office in Roslyn and satellite sales offices in Fire Island, Manorville, Cutchogue and East Hampton, we are responsible for the generation of approximately 2MW of renewable energy at our customer sites and are on track to continue an astounding growth rate in the coming year.

Our professional service, high quality engineering and design, and all in-house installation and maintenance methods translate into an enviable 100

percent growth rate since GreenLogic's founding in 2004. Our client base includes schools, municipalities, commercial and residential clients and our pace of installations demands that we add approximately two employees every month. We are proud of our work on behalf of clients such as Mattituck-Cutchogue School District, Manhasset Schools, U.S. National Parks at Fire Island National Seashore, East Hampton Village Emergency Services, Amaden-Gay Agency, The Maidstone Club, and for hundreds of showcase residences constructed by internationally noted builders. To accomplish this work, we now employ about 41 highly skilled, well-paid, college-educated individuals who are fast becoming active members of Long Island's "green army."

We attribute this growth to customer demands for our services as well as the myriad incentives available at the federal, state, and local utility level, which continue to make renewable energy options viable choices, even amidst our current recessionary market conditions. What is remarkable about our successful trajectory is that it has occurred in spite of a lack of participation in large-scale bids, many of which are typically structured to suit the capabilities of large multinational, mostly offshore corporations. GreenLogic Energy is illustrative of the dynamic occurring across New York State: smart-growth regional players filling enterprise needs in specific coverage areas. We believe that speaks volumes about Long Islanders collective commitment to preserving our region's beautiful natural resources – the heartbeat of our local economy – combined with the power of utility incentives, industry promotion, and statewide policy facilitation.

New York's energy plan offers tremendous potential to transform our state into the nation's first "Greenpire State," a globally competitive renewable energy enterprise zone and nexus of *greenomic* investment activity that could stretch from Niagara Falls to Montauk Point. The state energy plan holds enormous potential to stimulate significant regional and local economic activity, foster development of PV technologies, build intellectual capital, stimulate sustainable employment, and potentially export proprietary knowledge, skills and capabilities on solar power and other types of renewable energy to domestic and international customers.

Once again, we applaud New York State in its efforts to drive renewable energy usage to greater heights in our state and we thank you for the opportunity to provide input into this crucial statewide energy plan.

Sincerely,

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