SIR Update Needs: Material Modifications

NYSEIA/Solar Developers
IPWG meeting
October 2018
MATERIAL MODIFICATIONS: BACKGROUND

• Status Quo: Lack of clarity regarding what modifications to an existing facility or application in progress will trigger a new IX application ("material" modification/MM)

• Per April/May 2018 IPWG Meetings: Solar developers to draft proposal regarding pre-PTO MM criteria, JUs to draft post-PTO criteria proposal

• Solar developer initial proposal: Base definition of MM on cumulative 60-day business day threshold/study time

• Bilateral discussions w/JUs (10/5) indicated issues with business day/study time concept, leading NYSEIA/solar developers to revert to propose revisions to initial JU (National Grid) document pertaining to MMs
1. Replace “significant” and “moderate” material modification with “material” (requiring new application/moves project out of place in queue), or “non-material”.

2. For pre-PTO projects - addition of ESS if it will not increase overall AC output of system should NOT be considered Material.

3. For both pre- and post-PTO projects - change in operating characteristics or schedules, such as operating mode and smart inverter settings should NOT be considered Material.

4. For pre-PTO projects - change wording about change in POI to "a change in POI to a location served by a different circuit"; add language about how SIR reqs pertaining to Landowner Consent, Site Control continue to apply (i.e. any change in land area would be Material and necessitate re-application)
5. Removal of language pertaining to "the utility reserves the right to make the final determination as to whether a proposed change is a Material Modification."

6. For both pre- and post-PTO projects, classification of any reduction in AC capacity of system as non-material.

7. Additional section for Non-material Modifications list for systems under 25kW.