

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

JU MM DRAFT – PROPOSED REVISIONS

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)

JU MM DRAFT – PROPOSED REVISIONS (CONT'D)

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.