March 12, 2018

Kathleen H. Burgess  
Secretary  
State of New York  
Public Service Commission  
Three Empire State Plaza  
Albany, NY  12223

Re:  Case 18-E-0018 – In the Matter of Proposed Amendments to the New York State Standardized Interconnection Requirements (SIRs) for Small Distributed Generators; and

Case 15-E-0751 – In the Matter of the Value of Distributed Energy Resources

Initial Comments of the IPWG/ITWG Commenters to the Commission’s Notice Soliciting Comments on Proposed Modifications to the Standardized Interconnection Requirements (SIR)

Dear Secretary Burgess:

On behalf of Consolidated Edison Company of New York, Inc., Orange and Rockland Utilities, Inc., Central Hudson Gas & Electric Corporation, Niagara Mohawk Power Corporation d/b/a National Grid, New York State Electric & Gas Corporation, and Rochester Gas and Electric Corporation (collectively, the “Joint Utilities”) and the New York Solar Energy Industries Association, BQ Energy, LLC, Clean Energy Collective, Monolith Solar Associates, Cypress Creek Renewables, Borrego Solar Systems, Inc., CleanChoice Energy, Hudson Valley Clean Energy, Inc., d/b/a Hudson Solar, Taitem Engineering, PC, Montante Solar, Suncommon NY, and Distributed Sun LLC, the Interconnection Policy Working Group (“ITWG”) and Interconnection Technical Working Group (“ITWG”) (collectively, the “IPWG/ITWG Commenters”), enclosed please find (1) Initial Comments of the IPWG/ITWG Commenters to the January 11, 2018 New York Public Service Commission’s (“Commission”) Notice Soliciting Comments on the Proposed Modifications to the Standardized Interconnection Requirements (SIR) (the “Notice”) and (2) tracked changes (i.e., redlines) to the clean version of the Department of Public Service Staff (“Staff”) proposed amendments to the SIR filed with the

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1 Cases 18-E-0811 et al., In the Matter of Proposed Amendments to the New York State Standardized Interconnection Requirements (SIRs) for Small Distributed Generators (“SIR Proceeding”), Notice Soliciting Comments on the Proposed Modifications to the Standardized Interconnection Requirements (SIR) (issued January 11, 2018)(“Notice”).

*Admitted only in New Jersey
Commission on December 20, 2017\(^2\) ("IPWG/ITWG Commenters’ SIR Redlines") except for Appendix G (Preliminary and Supplemental Screening Analysis). The IPWG/ITWG Commenters’ Redlines are self-explanatory and most were the subject of discussions within the IPWG and/or ITWG.

While the IPWG/ITWG Commenters were able to reach consensus on most of the Staff’s Proposed SIR Modifications, consensus could not be reached on Appendix G (Preliminary and Supplemental Screening Analysis) such that separate comments will be filed under separate cover today by the Joint Utilities and other stakeholders.

Please contact me if there are any questions. Thank you.

Very truly yours,

Susan Vercheak

Enclosures

\(^2\) SIR Proceeding, Staff Submittal of Proposed Amendments to the Standardized interconnection Requirements (SIRs) for Small Distributed Generators (filed December 20, 2017)(the “Proposed SIR Modifications”).