

**STATE OF NEW YORK
PUBLIC SERVICE COMMISSION**

**Interconnection Requirements and Application Process For
New Distributed Generators 5 MW or Less Connected in
Parallel with Utility Distribution Systems**

Case 16-E-0560

**COMMENTS OF DISTRIBUTED SUN LLC
IN RESPONSE TO JOINT PETITION FOR MODIFICATIONS TO THE NEW YORK STATE
STANDARDIZED INTERCONNECTION REQUIREMENTS AND APPLICATION PROCESS FOR NEW
DISTRIBUTED GENERATORS 5 MW OR LESS CONNECTED IN PARALLEL WITH UTILITY
DISTRIBUTION SYSTEMS FILED BY THE NEW YORK STATE SOLAR ENERGY INDUSTRY
ASSOCIATION ON SEPTEMBER 30, 2016**

Dated: December 2, 2016

**CHASE WEIR
DISTRIBUTED SUN LLC
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PRELIMINARY STATEMENT

Distributed Sun LLC applauds the Interconnection Policy Working Group (IPWG) for its efforts upon which is based the New York State Solar Energy Industry Association's (NYSEIA) petition for modifications to the New York Standardized Requirements and Application Process for New Generators 5 MW or Less Connected in Parallel with Utility Distribution Systems (the "SIR"). As a signatory to the petition, Distributed Sun believes that adoption of these recommendations will enable the Utilities to streamline interconnection queues and will provide a more balanced economic framework via the cost sharing mechanism for interconnection upgrades where applicable. While Distributed Sun comments provided herein represent our own position regarding the petition, and not necessarily that of the IPWG or NYSEIA, we believe from our participation in the IPWG working sessions that many developers share this position.

COMMENTS

THE STANDARDIZED PROPERTY OWNER CONSENT AND SITE CONTROL FORM SHOULD NOT BE REQUIRED FOR PROJECTS UNDER DEVELOPMENT AT THE TIME OF THE ISSUANCE OF THE ORDER FOR QUEUE MANAGEMENT AND COST SHARING

To streamline the interconnection process, the NYSEIA petition¹ recommends the requirement for developers to prove site control via a Statewide Standardized Property Owner and Site Control form ("owner consent form") unless an interconnection contract has been executed and any construction payments for an application have been received. Projects that meet the exception criteria may attach a copy of an agreement or contract signed by the property owner in lieu of the owner consent form. Draft versions of the owner consent form have been circulated, but the final document are not anticipated to be released until the issuance of an Order.

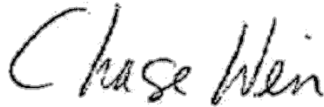
¹ Case 16-E-0560, Joint Petition for Modifications to the New York Standardized Requirements and Application Process for New Generators 5 MW or Less Connected in Parallel with Utility Distribution Systems, Appendix A, New York State Energy Industry Association (filed September 30, 2016)

Distributed Sun supports the requirement for the owner consent form once it is approved and published. However, the requirement to sign an additional form provides the site owner the opportunity to renegotiate terms in existing agreements which could negatively impact the business case underlying investments already made.

CONCLUSION

Distributed Sun is in general agreement with NYSEIA's petition but suggests that the retroactive requirement for the owner consent form be waived for projects that demonstrate site control through a signed agreement, or an option to: purchase or lease property from the respective property owner.

Respectfully submitted,

A handwritten signature in black ink that reads "Chase Weir". The signature is written in a cursive, flowing style.

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