March 26, 2018

VIA ELECTRONIC FILING

Hon. Kathleen H. Burgess
Secretary to the Commission
New York State Public Service Commission
Albany, New York 12223-1350

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

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

Dear Secretary Burgess:

The City of New York respectfully submits the *Reply Comments of the City of New York on the Proposed Modifications to the Standardized Interconnection Requirements* for filing in the above-referenced proceedings.

Respectfully submitted,

COUCH WHITE, LLP

Catherine L. Nesser

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Attachment
STATE OF NEW YORK
PUBLIC SERVICE COMMISSION

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

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

REPLY COMMENTS OF THE CITY OF NEW YORK ON THE PROPOSED MODIFICATIONS TO THE STANDARDIZED INTERCONNECTION REQUIREMENTS

Dated March 26, 2018

COUCH WHITE, LLP
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PRELIMINARY STATEMENT

The City of New York (“City”) respectfully submits these reply comments to respond to the initial comments submitted by the IPWG/ITWG on Staff’s proposed SIR.¹ The City generally supports the points made in the IPWG/ITWG’s initial comments, and adds an important refinement to the IPWG/ITWG’s proposal regarding payment milestones that would help facilitate more efficient interconnection for DG projects.

REPLY COMMENTS

In their initial comments, the IPWG/ITWG state that utilities should be named as additional insureds in the general liability policies of project developers and that project developers should be permitted to self-insure, provided they meet certain reasonable conditions. These comments align with the initial comments submitted by the City, subject to the City’s additional comment

that there should be symmetrical protection for project developers if a utility’s system causes damage to an interconnected facility. In its initial comments, the City also posited that there should be some symmetry in accountability for project developers and utilities to meet the milestones set forth in the SIR.

The IPWG/ITWG also proposes payment milestones to better align SIR payment milestones with local permitting processes. It is the City’s position that these proposed payment milestones are reasonable and would be a constructive addition to the SIR. However, the City believes that these provisions would be further improved if the utility were required to offer an electronic payment option for utility charges such as those for Coordinated Electric System Interconnection Reviews and for system upgrades. Allowing developers the option of electronic payment of charges owed to the utility would mitigate delays, reduce soft costs and improve the overall efficiency of the SIR process. Importantly, it may also avoid a scenario where the developer’s project is removed from the utility’s queue based on a mistaken belief that a required payment had not been made in a timely manner.

CONCLUSION

The City shares the interest of the Commission and other stakeholders in increasing the penetration of DG and in improving the SIR to achieve this end. The City maintains that i) there should be symmetry in the insurance requirements and accountability for deadlines between utilities and project developers and ii) the IPWG/ITWG’s payment milestones should be adopted along with a requirement that utilities offer an electronic payment option to improve the coordination and efficiency of the interconnection process.
Respectfully submitted,

/s/ Catherine L. Nesser

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Dated: March 26, 2018
Albany, New York

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Dated: March 26, 2018
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