**DG Material Modifications**

(As applicable to the New York State Standardized Interconnection Requirements.)

**Definitions:**

“Modification” means a change to the ownership, equipment, equipment ratings, equipment configuration, operating conditions to the interconnection site of the distributed energy resource facility proposed at any time by the interconnection applicant.

After receiving notification by the utility that the application is complete and is eligible for interconnection, the modification can be classified as “material” or “non-material”.

“Material”: A modification whose study and/or incorporation of application revisions adversely impacts the project and/or other queued interconnection requests beyond the thresholds outlined below for the proposal and evaluation of modifications

“Non-material”: any modification not determined to be material.

**Purpose:**

The purpose of this policy is to ensure the proper review of significant modifications to existing interconnection applications as well as to prevent these modifications from unfairly impacting subsequently queued interconnection applications. While an interconnecting customer may reasonably request the flexibility to make modifications in response to changing market conditions, equipment availability, and site composition among other items, this flexibility must be balanced with the interest of all interconnection applications to 1) experience timely progress through the SIR process, 2) not experience unfair delays due to the action of other interconnecting customers in the interconnection queue, and 3) maintain relative certainty as to the cost of any necessary system modifications.

A proposed modification may alter the impact of a project to the distribution system. This impact to the distribution system is studied and evaluated either in the standard SIR CESIR process or in the modification evaluation process described below. A utility’s study of the modification is needed to determine if the proposed modification is a material or non-material modification. The exceptions to this criterion are outlined below.

**Application:**

The utility reserves the right to make the final determination as to whether a proposed change is a material modification.

An interconnecting customer who chooses to proceed with a modification that is determined to be material shall be required to resubmit their interconnection request.

A modification that is deemed to be non-material must still be evaluated and accepted by the utility through the process described below. The interconnecting customer is obligated to pay any necessary study costs that may result from that evaluation.

**For projects above 50kW:**

**For projects which have not yet received their PTO:**

**Material modifications include the following:**

* A change in point of interconnection (POI) to a location served by a different circuit, moved to a different line segment (i.e. 3-phase to 1-phase segment, or change in zone of protection), change in site control[[1]](#endnote-1) or any change in point of interconnection (POI) for projects interconnecting to network systems.
* A change from certified (NRTL, e.g. UL listed) to non-certified devices.
* An increase in the name plate of the DG or ESS facility of more than 2%, or any increase causing adverse impact to subsequent applications ability to interconnect.
* Addition of DG at the facility (other than the 2% increase in net export) not disclosed in the application. This would include existing non-disclosed and requested additional generation.
* Change in DER [[2]](#endnote-2) operating characteristics or schedules, such as operating mode and smart inverter settings unsolicited by the utility.

**Non-material modifications include, but not limited to, the following:**

* A change or replacement of generating equipment such as generator(s), inverter(s), transformers, relaying, controls, etc. that is like-kind substitution in size, ratings, impedances, efficiencies or capabilities of the equipment specified in the original or preceding Interconnection Request as long as the net export does not increase beyond the 2% threshold described above.
* A change of transformer connection(s) or grounding from that originally proposed.
* A change reducing the AC output of the generating facility.
* A change in point of interconnection (POI) to a new location not described under material modifications.
* A change in ownership of a generating facility.
* Any necessary change not associated with the project modification or a suggested change requested by the utility.

**For projects that have already received their PTO**

Any DER requesting changes or modifications after which has received PTO, the standard application process per the SIR shall apply.

Projects that have received their PTO and wish to make changes to their project from what was delivered to the utility with the as-built documentation at the time of energization shall be required to notify the utility of their intent to modify their DER and are obligated to wait for approval by the utility of their proposed modification prior to the implementation of that modification.

**Process to propose non-material modification prior to receiving PTO:**

An interconnecting customer may propose a non-material modification to an interconnection application at any point in the interconnection process for projects that have not received PTO.

All SIR deadlines shall remain in effect during the proposal, evaluation, and review of a proposed modification.

Any modifications to a project will require a notification to the utility through utility interconnection online application portal and /or via email.

If the modification is proposed prior to the start of a CESIR:

* The interconnecting customer may propose any change not included in the list of material modifications, to be studied in the standard CESIR process.
* No proposed modification, or its evaluation, shall delay the progress of the interconnection or its SIR deadlines.

If the modification is proposed during the first 40 business days of the start of the CESIR:

* The interconnecting customer may propose any change not included in the list of material modifications.
* Upon receipt of the proposal for modification, the utility within 10 business days will review to determine whether the information provided for modification is complete and whether any additional information is required from the applicant to evaluate the proposed modification.
* Once the documentation is deemed complete, the utility will within 5 business days notify the interconnecting customer of any additional funding that may be required to evaluate the proposed modification
* Upon receipt of the above information from the utility, the interconnecting customer shall have 10 business days to satisfy the requirements for the evaluation of the proposed modification and pay the associated fees or choose to proceed with the original interconnection application.
* The CESIR shall resume upon receipt by the utility of the required documentation and/or funding, with a 20 business day extension not to exceed 80 business days from the original start of the study.

If the modification is proposed after the first 40 business days of the start of the CESIR or after the receipt of the CESIR:

* The interconnecting customer may propose any change not included in the list of material modifications.
* Upon receipt of the proposal for modification, the utility within 10 business days will review to determine whether the information provided for modification is complete and whether any additional information is required from the applicant to evaluate the proposed modification.
* Once the documentation is deemed complete, the utility will within 5 business days notify the interconnecting customer if the material change has been accepted or if the modification is deemed material and requires a new application.
* Any further study and/or evaluation agreed to above will commence once the requirements have been met by the interconnecting customer. The utility retains the right to determine the extent of evaluation necessary but will endeavor to complete any necessary study within a timeframe no longer than a standard CESIR.
* For projects that have made their 25% and/or 75% payment, the interconnecting customer shall agree to pay any cost associated with change in scope of system modifications that may result from the incorporation of the proposed modification.
* No proposed modification, or its evaluation, shall delay the progress of the SIR deadlines.

**For projects 50kW and below:**

Any material modification of a project of 50 kW or below requires a new application.

**The following are considered non-material modifications for either projects which have already or have not yet received their PTO:**

* A change in ownership of a generating facility
* A like-for-like change or replacement of generating equipment of same nameplate and characteristics such as generator(s), inverter(s), solar panel(s), transformers, relaying, controls, axis-tracking or fixed-tilt hardware.
* An increase in the AC export potential across the PCC for the DG facility no greater than 1kW or 10%.

The owner will notify the utility of like-for-like substitutions, which shall be reviewed and approved by the utility’s project engineer prior to acceptance of the change.

Any modifications to a project will require a notification to the utility through utility interconnection online application portal and /or via email.

1. NOTE: The SIR requirements pertaining to “Landowner Consent” and “Site Control” always apply. Therefore, at all points in the interconnection process, a project and its configuration must fall within the land area that is covered by the applicable document (Landowner Consent or Site Control). Put plainly, if the land area for a project changes from what is addressed by its applicable site documentation, it must re-apply [↑](#endnote-ref-1)
2. Changes due to integrating ESS to existing PV projects shall follow the “PV plus ESS Interim Guidelines document”. [↑](#endnote-ref-2)