COMMENOTS OF HUDSON SOLAR REGARDING THE COMMISSION’S NOTICE
SOLICITING COMMENTS ON PROPOSED MODIFICATIONS TO THE
STANDARDIZED INTERCONNECTION REQUIREMENTS (SIR)
(Case 18-E-0018 and Case 15-E-0751)

Dear Secretary Burgess,

Hudson Solar has signed on in support of the comments being filed today by the IPWG. We have two additional suggested modifications at this time.

1. Net Meter Installation for Residential Systems

Earlier versions of the SIR allowed installers to request that utilities install net meters so that they were already in place when net metered systems were completed, tested and inspected. This allowed systems to be turned on and customers given their final “walk through” instructions on the same day, saving installers added time and costs from having to return later to turn systems on after the net meters were installed. It also avoided very real customer frustration that emanated from having smaller on-site PV systems installed but sitting idle for one to four weeks waiting for net meters while paperwork was gathered, sent to the utilities, processed and the meter installations scheduled and performed.

We propose additional wording be added to the “residential” section of the SIR; Section B Step 4, last paragraph:

For net metered systems as defined in Section II.A.6, Metering, any modifications related to existing metering configurations to allow for net energy metering for residential, farm service, and non-residential wind electric generating systems shall be completed by the utility within ten (10) Business Days of either notification to the utility that the installation is intended to be completed within fifteen (15) business days, the installation has been completed, or request for a verification test, whichever comes first.

12 March 2018

Hon. Kathleen H. Burgess
Secretary to the Commission
New York State Public Service Commission
Agency Building 3
Albany, NY 12223-1350
2. **Appendix G**

A revised Appendix G, Preliminary Screening Analysis (Screens A to F), has been proposed, but the IPWG and ITWG have not yet reached consensus on the changes to the Technical Screens in that appendix. These screens are critical for allowing smaller commercial and CDG systems to be financially viable, since such projects cannot tolerate the costs nor time required for a CESIR. A small mistake in defining these screens could have serious negative consequences on a market segment that is already depressed and struggling. NYSERDA has recognized the challenges faced by this small commercial segment, and is in the process of adjusting its incentives to help stimulate it. Therefore, we request that Screens A to F not be changed from the version of the SIR currently in effect, while the IPWG and ITWG continue to work on reaching a consensus that includes an understanding of the market impacts.

Thank-you for considering these requests.

Sincerely,

Jeff Irish, PE
President
Hudson Solar