

March 31, 2025

SENT VIA ELECTRONIC FILING

Hon. Michelle Phillips  
Secretary to the Commission  
New York State Public Service Commission  
Empire State Plaza, Agency Building 3  
Albany, NY 12223-1350

**Re: In the Matter of Modifications to the New York State Standardized Interconnection Requirements and Application Process for New Distributed Generators and/or Energy Storage Systems 5 MW or Less Connected in Parallel with Utility Distribution Systems. *Comments of the Coalition for Community Solar Access on DPS Staff Proposed Modification of SIR Requirements***

The Coalition for Community Solar Access (CCSA) appreciates the opportunity to provide comments on the Department of Public Service (DPS) Staff's Proposed Modifications of Cost Estimation Provisions in the SIR, filed in this proceeding on January 10, 2025.

The Coalition for Community Solar Access (CCSA) is a national coalition of businesses and non-profits working to expand customer choice and access to solar for all American households and businesses through community solar. Our mission is to empower every American energy consumer with the option to choose local, clean, and affordable solar. Many of our members are actively building and operating community solar projects in New York.

We appreciate Staff's attention on this issue and the work of the Interconnection Policy Working Group (IPWG) on improving the transparency and reliability of utility-provided cost estimates related to interconnection upgrades. Interconnection costs have risen significantly over recent years, as have cost overruns from original estimates. Developers have seen final invoices with costs well over the original estimates in the CESIR - far beyond a 15% contingency, and in some cases an entire order of magnitude greater. This level of high costs and uncertainty are a serious barrier to building renewable energy projects in New York, slowing progress towards our 2030 clean energy commitments and increasing the costs of doing so.

CCSA strongly agrees with NYSEIA's comments filed on February 14, 2025. While we thank Staff for its attempts to improve the cost estimation process, we share the concerns that the proposed solutions are not reflective of any consensus identified in the IPWG between industry and the distribution utilities, and are not only inadequate, but potentially counter productive, to delivering true cost control, transparency, and predictability.

### **Utility cost estimating matrix**

CCSA agrees that an annually updated matrix describing typical upgrade costs will be beneficial and a significant improvement to the current process. We agree the matrix should be based on actual incurred costs within the past few months and that it should be fully inclusive of all installation costs including labor and overhead costs. We recommend that where the utility provides ranges of costs, that those ranges are specific and include a complete description of what may cause variance within the range.

### **Annual updates of cost estimates to developers**

CCSA supports NYSEIA's comments and recommendations on updated cost estimates to developers. We share the same concerns that allowing changes within a 12 month period of the CESIR does not provide any stability for developers to make investment decisions on whether to move forward with the project or not, and agree that the resulting volatility has the potential to disrupt interconnection queues and cost-sharing frameworks.

### **Elimination of the 15% contingency allowance**

CCSA strongly disagrees with this change. In fact, we agree with NYSEIA that a revision is necessary in the opposite direction - the cap should be an enforceable, stronger mechanism to incentivize utilities to develop more accurate cost estimates and keep the upgrade projects within budget. In no other market or context is a customer expected to pay for egregious budget overruns; it is a well accepted practice that a contractor should have some responsibility for keeping the scope and budget of a project to the agreed upon terms from the original contract. Utility interconnections should be no different. We fail to understand how removing a contingency cap will result in more accurate estimates or lower total costs, and we remind Staff and the Commission that the greater the interconnection costs, the greater the need for ratepayer funded incentives in order to meet the State's commitments to meet its distributed solar and clean energy targets.

We again applaud the Commission's consideration of improving cost estimates for distributed generation interconnection, but overall find Staff's proposal insufficient to produce the intended



outcomes. We encourage the Commission to consider NYSEIA's alternative proposal, which CCSA believes will better address the concerns around cost transparency and accuracy.

Thank you for your consideration.

Sincerely,

/s/ Kate Daniel  
Northeast Regional Director  
Coalition for Community Solar Access