STATE OF NEW YORK
PUBLIC SERVICE COMMISSION

In the Matter of Consolidated Billing	**)**	
for Distributed Energy Resources	**)**	**Case 19-M-0463**

COMMENTS OF NEW YORK SOLAR ENERGY INDUSTRIES ASSOCIATION IN SUPPORT OF THE COALITION FOR COMMUNITY SOLAR ACCESS' PETITION FOR REHEARING OF THE PUBLIC SERVICE COMMISSION'S ORDER APPROVING COMMUNITY DISTRIBUTED GENERATION BILLING AND CREDITING PERFORMANCE METRICS

September 2, 2025

New York Solar Energy Industries Association (NYSEIA) respectfully submits these comments in strong support of the Coalition for Community Solar Access' (CCSA) petition[1] for rehearing of the Commission's July 17, 2025 order[2] on community distributed generation (CDG) billing and crediting performance standards.

We appreciate the Commission's efforts to improve utility accountability and ensure that community solar subscribers receive timely credits. Performance metrics for timely crediting are long overdue and essential to preserving confidence in New York's community solar program. However, NYSEIA is deeply concerned by the Commission decision to authorize a 50% increase in the net crediting fee without a transparent, evidence-based justification. We urge the Commission to reverse this element of its July Order and to eliminate the unsubstantiated fee increase.

As the statewide trade association representing New York's community solar industry, NYSEIA has been actively involved in shaping New York's CDG billing and crediting framework. For the last several years, we worked closely with stakeholders and the Department of Public Service to propose performance metrics and accountability mechanisms to prevent utility performance deficiencies that harm CDG providers and their customers. Our members have experienced numerous instances of delayed or inaccurate crediting, leading to customer confusion, lost revenue, and reputational damage. Our members and their customers have gone months, and in some cases *more than a year*, without receiving any compensation or bill savings for their solar production due to utility billing & crediting delays and errors. These issues persisted for years and were a driving force behind the effort to establish performance metrics and accountability. It is both inequitable and illogical to impose higher fees on the parties who have

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[1] Coalition for Community Solar Access. *Petition for Rehearing of the Public Service Commission's Order Approving Community Distributed Generation Billing and Crediting Performance Metrics.* Case 19-M-0463. Filed August 18, 2025.
[2] New York State Public Service Commission. *Order Approving Community Distributed Generation Billing and Crediting Performance Metrics.* Case 19-M-0463. Issued July 17, 2025.

borne the brunt of these failures, especially in a proceeding designed to protect them from utility underperformance.

The Fee Increase Lacks Justification and Undermines the Intent of the Proceeding

The Commission's order approved a substantial increase in the net crediting fee without requiring utilities to demonstrate that the additional costs are necessary to cover prudently incurred incremental costs associated with providing timely service to community solar customers. The decision is troubling not only from a ratemaking standpoint, but also from a policy perspective. The proceeding was initiated to address systemic utility performance failures that harmed community solar developers and subscribers. Yet the Commission Order shifts new costs onto the injured parties while rewarding the utilities with a 50% revenue increase, all without any clear evidence that the revenue is needed. Rate increases should be based upon a rigorous and transparent cost analysis, subject to stakeholder review and formal discovery.

NYSEIA Members have been Directly Harmed by Utility Billing Failures

NYSEIA member companies have faced significant challenges due to utility billing and crediting errors. From 2022 through 2024, thousands of community solar customers did not receive just and reasonable service from their utility: utility bills were late, erroneous, and blame was inappropriately prescribed to the solar providers. CDG providers lost revenue, their customer relationships were damaged, and they incurred additional customer service, subscriber acquisition and management expenses. Some companies even forewent developing additional CDG projects in New York due to their concern that they would not be compensated for the electricity generated.

During this time period, NYSEIA spent countless hours advocating for CDG customers to receive just and reasonable service, participated in dozens of Billing & Crediting Working Group meetings and facilitated many project-specific meetings among CDG providers, customers, utilities and staff from DPS and NYSERDA in attempts to resolve the crediting issues. CDG billing & crediting performance metrics were not proposed out-of-the-blue in order to provide a premium service; they were proposed to address systemic failure by utilities to properly administer New York's CDG program and their failure to provide adequate service to participating customers. NYSEIA acknowledges that utility performance has improved over the last year, largely due to process automation. However, performance metrics are critical to prevent utilities from backsliding. We commend the Commission for adopting some of DPS Staff's recommendations and establishing performance metrics to ensure that utilities issue timely credits to their customers and process host allocation lists in a timely manner. This is a step in the right direction. However, rewarding utilities with higher fees on the back of the CDG customers in this same Order, with the absence of demonstrated need, is simply a mistake and should be reversed without delay.

Recommendations for Rehearing

NYSEIA respectfully urges the Commission to:

- Maintain the CDG net crediting fee at the current 1.0% level unless and until utilities submit detailed, utility-specific cost data that justifies an increase through a rate case or a petition.
- Closely evaluate the utility cost estimates, which are to be filed within 60 days of the July order.
- Ensure that any cost filings are subject to formal discovery and stakeholder scrutiny.
- Require utilities to include comprehensive work papers with their annual cost reports, detailing how fees are managed and reconciled against actual expenditures.

We appreciate the Commission's attention to this matter.