



September 2, 2025

VIA ELECTRONIC FILING

Hon. Michelle L. Phillips, Secretary
New York Public Service Commission
Three Empire State Plaza, 19th Floor
Albany, New York, 12223-1350

Comments of NYSEIA in Support of CCSA's Petition for Rehearing of the Commission's July 17, 2025 Order in Case 19-M-0463

Dear Secretary Phillips,

On behalf of the New York Solar Energy Industries Association (NYSEIA), please find enclosed our comments in support of the Coalition for Community Solar Access' (CCSA) petition for rehearing of the Commission's July 17, 2025 Order approving community distributed generation (CDG) billing and crediting performance metrics in Case 19-M-0463.

NYSEIA has been a committed stakeholder in the development of CDG billing and crediting reforms and performance standards. Our comments reflect deep concern regarding the Commission's authorization of a 50% increase in the CDG net crediting fee without a transparent, evidence-based cost justification. We respectfully urge the Commission to grant a focused rehearing to reverse this aspect of the Order.

Thank you for the opportunity to provide input on this important matter. Please do not hesitate to contact me with any questions or requests for further information.

Sincerely,

Noah Ginsburg
Executive Director
New York Solar Energy Industries Association