NEW YORK STATE | Department of Public Service

KATHY HOCHUL
Governor

RORY M. CHRISTIAN
Chief Executive Officer

June 30, 2026

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

Re: Case 24-E-0621 – 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.

Appendix M – Staff Interpretive Memorandum # 3

Dear Secretary Phillips:

As authorized in the Commission's Order on Interconnection Queue Management issued on January 23, 2026 (the Order), Department of Public Service Staff (Staff) provides the following guidance to resolve an interpretive question arising under the Order and the Standardized Interconnection Requirements (SIRs).[1] This question was raised by stakeholders at the May 5, 2026 meeting of the Interconnection Policy Working Group (IPWG).

At that meeting, participants expressed concern that the Order does not provide a time frame for deposit payments for a project that does not meet its payment obligations under Appendix M. Such a project is dropped from the Appendix M scheduling protocol but does not lose its SIRs queue position. However, participants seek clarification of the payment obligations for projects that fall out of Appendix M but wish to proceed to interconnection under the standard SIRs process.

Having considered the question raised, the relevant provisions of the SIRs, and in accordance with the authority provided by the Commission in the Order, Staff makes the following determination: projects that drop out of the Appendix M scheduling rules due to non-

[1] The New York State SIRs apply to new distributed generators and/or energy storage systems sized at 5 MW or less that connect in parallel with utility distribution systems. The current version is available on the Distributed Generation webpage of the Department of Public Service: https://dps.ny.gov/distributed-generation-information.

payment by the Release Date will retain their original SIRs queue position so long as they pay 100% of the deposit that would have been due under the SIRs within a reasonable time after the relevant non-payment event. Staff further determines that, in such a case, thirty (30) calendar days after the Release Date would be a "reasonable time," as such a project will have been aware of the cost of necessary upgrades prior to missing the payment due by its Release Date. If the deposit payment is not made within that time, the utility shall remove the project from the interconnection queue, as provided under the SIRs.

Sincerely,

Andrew Lidington
Ombudsperson for Distributed Generation
Project Coordinator