

**NEW YORK STATE
PUBLIC SERVICE COMMISSION**

New York Solar Energy Industries Association	)	
Response to Joint Utilities Filings	)	
In the	)	
Matter of Timely Interconnection of	)	Case 24-E-0415
Distributed Energy Resources	)	

Introduction

In April 2024, New York enacted its Fiscal Year 2025 Budget, a series of bills that includes the Renewable Action Through Project Interconnection and Deployment (RAPID) Act. While the primary objective of the RAPID Act is to streamline the siting of transmission lines, the Act also includes a directive to the Commission to “commence a proceeding within ninety days of the effective date of this Act to review the cause and extent of any delays to interconnection of distributed energy resources.” The Act continues “This proceeding shall consider metrics related to the timely interconnection of distributed generation resources into the distribution system owned by an electric corporation, as well as revenue adjustments related to such metrics.”¹ On June 16, 2025, the Commission issued a Notice Soliciting Comments on two questions to assess the cause and extent of any delays to interconnecting distributed energy resources. New York Solar Energy Industries Association (NYSEIA) is a trade association representing hundreds of Distributed Energy Resource (DER) companies that operate in New York State, and respectfully provides these initial comments for consideration by DPS Staff and the Commission as this proceeding commences.

Summary of Joint Utilities Filings

In response to the first question on “detailed explanation for each CESIR completion date beyond 60 business days” New York Joint Utilities identified a “true” number of CESIR completions that took longer than 60 business days and 100 business days. The utility responses for CESIR that took longer than 60 business days were uniform in that the SIR permitted an extension of up to an additional 40 business days beyond the standard completion window, provided that the extension was mutually agreed to by both the utility and developer. The Joint Utilities separately identified CESIR that took longer than 100BD, which is currently permitted by the SIR. The Joint Utilities also provided a brief explanation for the need for this extension or delay over 100 business days.

In response to the second question on “identify any projects for which you sent one or more notices of incomplete or deficient interconnection design package pursuant to Step 5 of Section I of the SIR” the utilities identified the number of projects that required more than one notice with all utilities except National Grid elaborating on the total number of notices provided before the design package was deemed complete. The ConEdison engineering team identified common issues with the design package that resulted in one or more notices.

¹ New York State Legislature. Senate Bill 8308C. <https://legislation.nysenate.gov/pdf/bills/2023/S8308C>. April 2024.

New York State Electric & Gas Corporation and Rochester Gas and Electric Corporation did not file a response to the June 16, 2025 Notice. Thus the extent and effect of interconnection delay remains unknown.

NYSEIA Responses to Joint Utilities Filings

NYSEIA appreciates the Commission's and Joint Utilities' efforts in investigating the root cause of interconnection delays. However, the filings underscore persistent and systemic challenges that require urgent regulatory intervention.

The utility responses on CESIR timelines show that between 10%-15% of projects undergo a CESIR study longer than 60 business days. While the utilities characterize the additional 40 BD extension as a mutual agreement, developers, in practice, face a binary choice: either agree with the additional time or withdraw from the project. NYSEIA is not requesting specific improvements on this issue at this time, as there are far more important improvements the Commission can prioritize. Our intent here is to ensure that the true nature of the extension was clear to the Commission.

The issue of CESIR delays should be considered through the lens of how utilities can actively reduce CESIR study timelines. Queue data show that more than 50% of projects take 59 or more days to complete a CESIR. The utilities are structured to prioritize compliance and not violate SIR timelines. This has an unintended consequence of structuring operations to meet only the minimum requirements rather than striving for improvements.

As shown in table 1, on average across utilities, CESIR fees increased approximately 35.8% from 2023 to 2025. In National Grid's territory, average fees more than doubled over the same period; several other territories show substantial increases, while Con Edison declined modestly. One would expect that higher fees or outsourcing CESIR studies at increased cost would reduce study durations; however, in practice, these costs primarily discourage smaller or prospective projects from applying to less certain locations. In an ideal world the cost the utility can charge a project should depend on how quickly the CESIR study is performed. If the commission decides to prioritize CESIR timelines to reduce delays, we suggest that the Commission establish a maximum cost the utilities can charge based on the CESIR duration. A cost structure where the utility can charge a premium - no higher than current - if the CESIR is completed within 30 business days, and the maximum allowable fee should decline as the duration of CESIR increases to 40BD, 60 BD, or 100BD. With the expectation that this cost structure is conveyed to the subcontractors who perform the CESIRs, creating a clear financial incentive to optimize performance and reduce study timelines.

Table 1 - Average cost of CESIR study for System size above 1MW, between 2019 to 2025:

EDC	2019	2020	2021	2022	2023	2024	2025	% Change
NIMO	\$10,673	\$10,139	\$8,666	\$7,842	\$8,822	\$17,774	\$18,725	75%
Central Hudson	\$12,558	\$17,780	\$17,827	\$17,571	\$17,914	\$21,846	\$22,000	75%
NYSEG	\$5,032	\$5,078	\$8,140	\$10,208	\$10,061	\$11,985	\$13,384	166%
RGE	\$5,273	\$5,106	\$9,400	\$9,821	\$9,839	\$11,795	\$11,875	125%
CECONY	\$11,037	\$11,701	\$6,484	\$6,560	\$6,044	\$6,240	\$5,600	-49%
O&R	\$11,424	\$16,432	\$19,705	\$16,754	\$22,626	\$29,845	\$30,675	169%

A 30-40 business day delay can be reduced by evaluating and defining when a 40BD extension is truly justified, or by incentivizing the utilities to complete the CESIR in a shorter timeframe than allowed in the SIR. We believe that limited utility resources instead can be better spent by minimizing the number of revision notices issued to projects, as each notice typically requires at least 30 business days for the applicant to revise the design submission and for the utility to review it again.

Step 5 of Section I of the SIR requires applicants to provide simple deliverables listed in Appendix F. However, as shown in Table 2, at least 65% of projects require a second review, with 20% to 45% requiring more than two reviews. While utilities often attribute these additional reviews to incomplete or deficient submittals, it is in each project's best interest to submit complete and accurate materials. It should be assumed that applicants are doing so to the best of their ability. The root causes for multiple reviews are therefore

1. The requirements for submittals are not well documented and clear
2. Utility reviewers apply different standards or engineering preferences that may be too specific to fully document.

The project may apply its learning from one application to the next, but if the review criteria are not standardized, even a technically complete and accurate submittal may still receive a revision request.

Table 2 - Percent of project that received multiple notices

Utility	% of Projects with ≥ 1 Notice	% of Projects with ≥ 2 Notice	% of Projects with ≥ 3 Notice
Consolidated Edison	65.00%	28.74%	19.19%
PSEG Long Island	0.00%	0.00%	0.00%
National Grid	100.00%	Not Reported	Not Reported
Central Hudson	97.17%	46.23%	20.39%
ORU	65.67%	19.40%	13.64%

The design package provided under Step 5 of Section I is submitted before the project undergoes a CESIR. Developers typically first apply for interconnection to gain a clear understanding of the scope of work and upgrade costs before proceeding with other development activities. As a result, when a project applies for a CESIR, the project design and site plan are often preliminary and likely to change. The high number of second notices may be because the utility reviewers are heavily scrutinizing the design package well before the development is finalized. An expectation should be set with the reviewers that the project is very early in the development process, making it clear that the interconnection upgrade scope and the design package may change based on CESIR information. Therefore the focus should be to have the design package provide key information such as transformer location, POI, layout, inverter size sufficient to perform a CESIR, but not necessarily meet utility's detailed design requirements for the construction stage.

Most importantly, while this notice evaluates delays under the purview of the SIR, it is important to note that the majority of delays occur during the review of the "Design and Procurement" package". This stage is not defined in the SIR but is performed after the CESIR when the project has finalized its equipment selection, configuration, site plan, and point of interconnection. The "'Design and Procurement" package or "construction document review" stage is far more detailed and complex, where the submittals need to meet specific utility design requirements. The DER industry is experiencing significant delays at this stage. Where multiple subsequent reviews are performed—with the utility needing 30BD for each review—this review process is often extended to 8-12 months. The projects at this stage usually have a land use permit, an approved environmental impact study, and are seeking the earliest possible PTO date to have the assets generate revenue. The feedback we receive from DER developers here is that the utility design requirements are not well documented, and the "Electrical Specifications Bulletin" that documents these requirements are outdated and unclear. This issue is compounded by the fact that reviewers may apply differing engineering preferences not defined in the "Electrical Specifications Bulletin".

We recommend that the Commission direct the utilities to update their “Electrical Specifications Bulletin” or related documentation listing their electrical installation requirements, to provide the most current and clear information. For arbitrary design preferences that can not be described in the “Electrical Specifications Bulletin”, we request that the commission require the utilities to create template design packages/drawings that can serve as a guide for both DER applications and utility reviewers. Additionally, we recommend that the Commission require utilities to train their submittal review staff and develop internal review guidelines to standardize review practices across departments.

Conclusion

We are at a critical moment for clean energy. As federal support recedes, we encourage the Commission to take all necessary steps to reduce delays and soft costs. We appreciate the opportunity to provide comments and work collaboratively in identifying measures that help projects leverage federal support before the July 2026, December 2027, and December 2029 deadlines established in H.R.1, while also finding solutions that lower costs for DER projects and New York ratepayers.