STATE OF NEW YORK
PUBLIC SERVICE COMMISSION

In the Matter of the Advancement of Distributed Solar	**Case 21-E-0629**

COMMENTS OF MULTIPLE INTERVENORS

Dated: March 7, 2022

MULTIPLE INTERVENORS
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TABLE OF CONTENTS

Page

PRELIMINARY STATEMENT

Multiple Intervenors, an unincorporated association of over 50 large industrial, commercial, and institutional energy consumers with manufacturing and other facilities located throughout New York State, hereby submits to the New York State Public Service Commission ("Commission") its Comments on *New York's 10 GW Distributed Solar Roadmap: Policy Options for Continued Growth in Distributed Solar* ("Solar Roadmap"), which was issued jointly by New York State Department of Public Service Staff ("Staff") and the New York State Energy Research and Development Authority ("NYSERDA") on December 17, 2021, in Case 21-E-0629.[1] These Comments are submitted in accordance with the *Notice Soliciting Comments on Solar Roadmap* issued by the Commission on December 22, 2021.

In the Solar Roadmap, Staff and NYSERDA propose that the Commission adopt a strategy to achieve 10 gigawatts ("GW") of distributed solar by 2030. Such an objective would constitute a 4 GW, or 66.7%, increase over the existing target of procuring 6 GW of solar by 2025, which is mandated by the Climate Leadership and Community Protection Act ("CLCPA"). To achieve such increase, the Solar Roadmap proposes that an additional $1.474 billion in NY-Sun Program ("Program") funding be collected from customers through the Bill-As-You-Go mechanism established under the Clean Energy Fund ("CEF").[2]

In addition to increasing the existing distributed solar target to 10 GW, the Solar Roadmap proposes multiple modifications to the Program. Such modifications would include: (a) extending the existing NY-Sun Megawatt Block Program to 2030; (b) adopting incentive structures for the Consolidated Edison Company of New York, Inc. service territory that differ

[1] Case 21-E-0629, *In the Matter of the Advancement of Distributed Solar*.

[2] Solar Roadmap at 73.

from those that would be applicable to the rest of the State; (c) allocating at least 1,600 megawatts ("MW") of new incentives towards low-to-moderate income customers, affordable housing, disadvantaged communities, and environmental justice areas; (d) improving existing interconnection policies; and (e) providing for a mid-Program review to be conducted after 50% of the incentives have been committed, or by December 31, 2025, whichever is earlier.[3]

Initially, Multiple Intervenors recognizes that the CLCPA mandates achievement of an aggressive 70% renewable penetration target by 2030 ("70 by 30 Target") and a 100% zero-emission electric grid by 2040 ("100 by 40 Target"), and generally supports cost-effective efforts to decarbonize the State's electric system. Importantly, however, careful scrutiny must be applied to the costs associated with the proposed Solar Roadmap, and the Commission needs to evaluate whether the strategies identified therein are likely to constitute the most cost-effective approach to achieving the 70 by 30 Target and/or the 100 by 40 Target. New York utility customers already are overburdened and contribute billions of dollars annually to a large and rapidly-growing list of customer-funded programs and initiatives. The State's economy also is continuing to experience the disruptive impacts of the COVID-19 pandemic, as well as energy prices that have skyrocketed in early-2022.

Moreover, as detailed herein, the proposed expansion of the existing solar target to 10 GW goes well beyond what is required by the CLCPA, and, therefore, only should be pursued if it represents the most cost-effective approach to achieving the 70 by 30 Target and/or the 100 by 40 Target – a showing that has yet to be made in this proceeding. Furthermore, because the incremental costs associated with expanding the target by 4 GW (*i.e.*, from 6 GW to 10 GW) are disproportionably higher than the cost of expanding the target by 3 GW (*i.e.*, from 3 GW to 6 GW)

[3] *See id*. at 2-5.

approved by the Commission less than two years ago, a thorough examination of the cost-effectiveness of the Solar Roadmap is warranted.

In addition, the Solar Roadmap fails to demonstrate why certain proposed costs, such as supplementing the labor costs of solar developers, even should be funded by utility customers. Finally, Multiple Intervenors continues to assert that the Commission should not evaluate proposals that would implement new customer funding obligations in a vacuum; rather, it should evaluate such proposals collectively with the other programs and initiatives that customers already are being required to fund. This type of comprehensive evaluation is long overdue and should be undertaken expeditiously.

COMMENTS

POINT I

THE COMMISSION MUST EVALUATE WHETHER THE SOLAR ROADMAP CONSTITUTES THE MOST COST-EFFECTIVE MEANS OF ACHIEVING CLCPA MANDATES

The CLCPA mandates the State's procurement of 6 GW of solar by 2025,[4] and spending plans already are in place to meet that goal. The Solar Roadmap proposes to increase the Program's target in response to a directive by Governor Hochul in September of 2021, calling for the procurement of 10 GW of distributed solar by 2030 through the NY-Sun Program.[5] Significantly, however, while the initial target of 6 GW of solar by 2025 is mandated by the CLCPA, there is no statutory mandate that compels 10 MW of distributed solar by 2030, nor is the

[4] *See* N.Y. Pub. Serv. Law § 66-p (LexisNexis 2021).

[5] *Governor Hochul Announces Expanded NY-Sun Program to Achieve at least 10 Gigawatts of Solar Energy by 2030* (September 30, 2021), available at Governor Hochul Announces Expanded NY-Sun Program to Achieve at Least 10 Gigawatts of Solar Energy by 2030 - NYSERDA.

State required to achieve either the 70 by 30 Target or the 100 by 40 Target via the deployment of a specified amount of distributed solar.

Pursuant to the CLCPA's mandates, the Commission is tasked with overseeing the State's achievement of the 70 by 30 Target and the 100 by 40 Target.[6] The Commission also is required to ensure that all rates charged to customers – including CEF collections – are just and reasonable.[7] In accordance with these statutory mandates, the Commission must examine whether the Governor's directive to increase the distributed solar target is consistent with its overarching duty to protect customers from unjust and unreasonable charges. Specifically, Multiple Intervenors contends that the Commission should evaluate whether other renewable and/or non-emitting sources would represent more cost-effective options to achieve the CLCPA's mandates absent any express statutory requirement to increase the existing solar target beyond 6 GW. If other forms of renewable generation would be more cost-effective, subjecting customers to excessive costs associated with the Solar Roadmap would result in rates that are not just and reasonable.

As stated, *supra*, the CLCPA does not mandate any increase in the existing 6 GW solar target. Accordingly, Staff and NYSERDA should be required to justify the need for customers to be forced to fund additional distributed solar, as well as demonstrate that the proposed, incremental 4 GW target is cost-effective compared to other alternatives. Unfortunately, the Solar Roadmap does not make any such showing. In fact, the Solar Roadmap lacks any analysis as to why a new target for distributed solar should be set at 10 GW, as opposed to, for example, 8 GW or 12 GW.

[6] N.Y. Pub. Serv. Law § 66-p.

[7] *Id*. § 65(1).

There are a number of avenues available to New York to achieve the 70 by 30 Target, as well as the 100 by 40 Target. In fact, the Commission already is pursuing many of those avenues, such as incentivizing the development of large-scale wind and solar projects pursuant to Tier 1 of the Clean Energy Standard. If distributed solar is more cost-effective than larger-scale Tier 1 projects, then distributed solar may warrant increased reliance. If, on the other hand, even greater reliance on Tier 1 projects would be more cost-effective than distributed solar for customers, then the proposals advanced in the Solar Roadmap should be rejected or modified. In other words, inasmuch as there is no legal requirement that New York achieve 10 GW of distributed solar – as opposed to the 6 MW solar target set forth in the CLCPA – the Commission only should adopt the higher target if it represents the least-cost option for customers. To date, there has been no showing supporting such a conclusion.

Multiple Intervenors respectfully asserts that the Commission should undertake a thorough assessment of the Solar Roadmap's proposals to ensure that they would be cost-effective prior to issuing any ruling in this proceeding. The Solar Roadmap fails to demonstrate the merits of increasing CEF collections from customers – which previously were pegged at $6 billion – by another $1.474 billion. Further, contrary to the Solar Roadmap, for instance, the fact that New York may be ahead of schedule in achieving the CLCPA mandate of 6 GW of solar by 2025 does not indicate, in and of itself, that additional funds should be collected from customers to support an increased goal. It could be that distributed solar is cost-effective; however, it also could mean that existing customer-funded incentives are overly generous to developers. Unfortunately, without any analysis as to how distributed solar compares to other alternatives – such as large-scale wind or solar – it is not possible to draw any conclusions as to whether the proposed incremental collections would constitute the most cost-effective use of increasingly-limited customer funds.

For the foregoing reasons, NYSERDA and Staff must demonstrate that the proposed 4 GW increase in distributed solar advanced in the Solar Roadmap is necessary. The CLCPA does not mandate the expansion of the existing 6 GW solar target; thus, at a minimum the Commission should ensure that further incentivizing distributed solar is the most cost-effective pathway towards achieving the specific mandates of the CLCPA.

POINT II

THE PROPOSED, INCREMENTAL $1.474 BILLION BUDGET FOR THE SOLAR ROADMAP SHOULD BE SCRUTINIZED CAREFULLY

If, *arguendo*, the Commission determines that customers should be forced to fund the 4 GW increase in distributed solar proposed in the Solar Roadmap, Multiple Intervenors respectfully asserts that the Commission still should undertake a comprehensive analysis of the associated $1.474 billion budget. Specifically, as detailed herein, the Solar Roadmap fails to justify either the substantial increase in the CEF budget or the inclusion of certain categories of costs as customers' responsibility.

A. The Massive Increase in Cost Has Not Been Justified

Staff and NYSERDA are proposing an additional $1.474 billion in customer funding – above and beyond the CEF's existing $6 billion budget – to increase the existing 6 GW Solar Target by 4 GW to 10 GW. The proposed incremental funding is broken down as follows: (a) $807 million for base project incentives; (b) $207 million for "Solar Energy Equity Framework" incentives; (c) $192 million for incentive adders including community adders and beneficial siting adders; (d) $239 million to assist the industry in complying with prevailing wage requirements; (e) $16 million associated with cost recovery; (f) $12.3 million for administration;

and (g) $1.0 million for a mid-Program review.[8] **Collectively, the proposed budget translates to $368.5 million per GW of distributed solar generation.**

Notably, when the NY-Sun Program target recently was increased from 3 GW to 6 GW, the approved budget was $573 million.[9] **That budget translated to approximately $191 million per GW of distributed solar generation. Thus, in just two years, the proposed cost to customers of funding incremental distributed solar generation has almost doubled from $191 million per GW to $368.5 million per GW.** Such a proposed increase in cost to overburdened utility customers is extremely troubling, and warrants a comprehensive evaluation of the budget proposed in the Solar Roadmap.[10] Thus, if, *arguendo*, the Commission is inclined to adopt the 10 GW target proposed in the Solar Roadmap, the budget increase associated with an incremental 4 GW in distributed solar should be scrutinized carefully, and reduced or minimized to the maximum extent possible.

B. The Inclusion of Additional Cost Stressors in the Proposed Budget Has Not Been Justified Adequately

Partially contributing to the proposed, substantial increase in the CEF budget is the Solar Roadmap's inclusion of tranches of funding to address "other" costs associated with continuing the Program. For example, the proposed budget includes an allocation of $239 million to assist the solar industry with an increase in prevailing wages, as well as funding for a higher incentive rate to account for supply chain constraints. It is not at all clear that these types of funding obligations should be foisted upon captive utility customers. Thus, in reviewing the Solar

[8] Solar Roadmap at 73.

[9] *Id.*

[10] Such increase also reinforces Multiple Intervenors' concerns advanced, *supra*, that achieving an incremental 4 GW in distributed solar may not constitute the most cost-effective approach to achieve CLCPA mandates.

Roadmap, the Commission independently should assess whether it is appropriate for utility customers to be funding all of the categories of expenses sought to be recovered through the CEF.[11]

While increases to prevailing wages and product costs may have an impact on overall project costs and accordingly development, in the Solar Roadmap Staff and NYSERDA do not explain why it would be appropriate to rely on customer funds to subsidize those increased supplier costs. Furthermore, the impact of the COVID-19 pandemic has left its mark on the economy as a whole, as well as on utility customers throughout the State. Accordingly, in addition to scrutinizing carefully whether the incremental 4 GW increase in distributed solar constitutes a cost-effective use of customer funding, the Commission also should evaluate whether the proposed budget is reasonable and if customers should be forced to subsidize additional costs associated with, for instance, prevailing wages and supply constraints.

POINT III

COST IMPACTS ASSOCIATED WITH THE SOLAR ROADMAP SHOULD BE EVALUATED IN CONJUNCTION WITH THE NUMEROUS OTHER FINANCIAL OBLIGATIONS IMPOSED ON CUSTOMERS

In addition to evaluating the costs proposed in the Solar Roadmap and their impact on customers, the Commission needs to start evaluating proposals that require incremental customer funding in the aggregate, in conjunction with the numerous other programs and initiatives that customers already are being forced to fund. Separate and apart from the $1.474 billion CEF budget increase proposed in the Solar Roadmap, customers already are funding and/or will be funding a myriad of other programs and initiatives in furtherance of the CLCPA and the

[11] If the cost of electricity continues to rise based on repeated decisions to utilize captive utility customers as default funding sources, those rising costs will significantly harm New York's economy and make it that much more difficult, and expensive, for the State to achieve its aggressive electrification goals.

State's clean energy objectives. While each of these programs and initiatives is intended to produce certain benefits, the ability of customers to fund incremental expense after incremental expense is not unlimited. Examples of existing funding commitments imposed on customers separate and apart from increased funding proposed in the Solar Roadmap include – but are not limited to – the following:

- Customers are and will be funding out-of-market payments of an indeterminate amount (believed to be in the many billions of dollars) to incentivize the development of new, large-scale renewable generation facilities under Tier 1 of the CES.[12]
- Customers are and will be funding out-of-market payments of an indeterminate amount (believed to be in the hundreds of millions of dollars) to incentivize the continued operation of existing renewable generation facilities under Tier 2 of the CES.[13]

[12] *See generally* Case 15-E-0302, *Proceeding on Motion of the Commission to Implement a Large-Scale Renewable Program and a Clean Energy Standard*, Order Adopting a Clean Energy Standard (issued August 1, 2016) at 78-115 (establishing a CES Tier 1 program for new renewable generating resources). The most recently-published prices for CES Tier 1 Renewable Energy Credits ("REC") is $22.47 per REC, available at: https://www.nyserda.ny.gov/All-Programs/Programs/Clean-Energy-Standard/LSE-Obligations/2021-Compliance-Year. Inasmuch as renewable generation penetration in New York recently has been under 30%, and must climb to 70% by 2030 under the CLCPA, it is anticipated that CES Tier 1 RECs will have a cost well into the billions of dollars during the coming decade.

[13] *See generally* Case 15-E-0302, *supra*, Order Adopting a Clean Energy Standard at 17-18, 115-19 (establishing a CES Tier 2 maintenance program for existing renewable generation facilities demonstrating financial need), and Order Adopting Modifications to the Clean Energy Standard (issued October 15, 2020) at 49-77 (establishing an additional, competitive solicitation component to CES Tier 2, irrespective of financial need, at a maximum incremental cost of $200 million through 2026).

- Customers are and will be funding out-of-market payments of an indeterminate amount (believed to be many billions of dollars) to incentivize the continued operation of existing nuclear generation facilities under Tier 3 of the CES.[14]
- Customers will be funding out-of-market payments to incentivize the development of new renewable energy systems to site within Zone J, or deliver energy therein, under Tier 4 of the CES.[15]
- Customers will be funding out-of-market payments of an indeterminate amount (believed to be many billions of dollars) to incentivize the development of new, offshore wind generation facilities.[16]

[14] *See generally* Case 15-E-0302, *supra*, Order Adopting a Clean Energy Standard at 119-153 (establishing a CES Tier 3 for existing nuclear generating facilities). The first two-year tranche of the 12-year Tier 3 program (encompassing April 1, 2017 through March 31, 2029) relied upon a zero-emission credit ("ZEC") price of $17.48 per ZEC, with ZECs applied to an annual maximum of 27,618,000 MWh (*see id.* at App. E), for a maximum annualized cost of $482,762,640. Thus, the existing, 12-year ZEC program is expected to cost between $5 billion and $7 billion, depending upon the cost of ZECs (which fluctuate) and the output of the State's existing nuclear generation facilities. Moreover, to the extent the CLCPA necessitates the continued operation of those facilities beyond March 31, 2029, the total Tier 3 costs may rise further, possibly significantly.

[15] *See generally* Case 15-E-0302, *supra*, Order Adopting Modifications to the Clean Energy Standard (issued October 15, 2020) at 77-103 (establishing a CES Tier 4 to increase penetration of renewables in Zone J); *see also id.*, Petition Regarding Agreements for Procurement of Tier 4 Renewable Energy Certificates (December 17, 2021) (requesting Commission approval for two contracts for the purchase of Tier 4 Renewable Energy Credits estimated to have bill impacts as high as 5.7% statewide in the first year of operation with even greater bill impacts upstate and potentially double the impacts for non-residential customers).

[16] *See generally* Case 18-E-0071, *In the Matter of Offshore Wind Energy*. *See also id.*, Order Establishing Offshore Wind Standard and Framework for Phase 1 Procurement (issued July 12, 2018) at 15-64 (establishing an offshore wind generation target of 2.4 GW by 2030 and authorizing an initial procurement process in support thereof). The CLCPA increased the offshore wind generation target from 2.4 GW by 2030 to 9 GW by 2035. N.Y. Envtl. Conserv. Law § 75-0103(13)(E) (LexisNexis 2021).

- Customers already are committed to funding the CEF at a cost of over $6 billion prior to any budget increases in response to the Solar Roadmap.[17]
- Customers are and will be funding utility-administered electric energy efficiency programs at a cost of close to $1.9 billion through 2025, and potentially more thereafter.[18]
- Customers are and will be funding utility-administered gas energy efficiency programs at a cost of close to $900 million through 2025, and potentially more thereafter.[19]
- Customers are and will be funding utility-administered electric heat pump programs at a cost of over $450 million through 2025, and potentially more thereafter.[20]

[17] *See generally* Case 14-M-0094, *Proceeding on Motion of the Commission to Consider a Clean Energy Fund*. *See also id.*, Order Authorizing the Clean Energy Fund Framework (issued January 21, 2016) at Appendix H (authorizing customer collections of $6,001,000); and Order Approving Clean Energy Fund Modifications (issued September 9, 2021) at Appendix E (authorizing $3,165,800 in collections from customers from 2021-2029).

[18] *See generally* Case 18-M-0084, *In the Matter of a Comprehensive Energy Efficiency Initiative*. *See also id.*, Order Authorizing Utility Energy Efficiency and Building Electrification Portfolios Through 2025 (issued January 16, 2020) (hereinafter, "NE:NY Order") at App. A, Table A3 (authorizing statewide spending on utility-administered electric energy efficiency programs of $1,879,114,825 from 2021-2025).

[19] *See id.*, NE:NY Order at App. A, Table A4 (authorizing statewide spending on utility-administered gas energy efficiency programs of $878,716,819 from 2021-2025).

[20] *See id.* NE:NY Order at App. C, Table C1 (authorizing statewide spending on utility-administered electric heat pump programs of $454,318,220 from 2020-2025).

- Customers are and will be funding incentives to promote electric vehicle infrastructure investments at a cost of over $700 million through 2025, and potentially more thereafter.[21]
- Customers are and will be funding an Electric Generation Facility Cessation Mitigation Program, to compensate municipalities that lose tax base when generation facilities retire due to the transition to a cleaner electric system, at a cost of $112.5 million through 2030.[22]
- Customers are and will be funding out-of-market payments and utility cost recovery of an indeterminate amount (believed to be substantial) to incentivize the development of new electric storage facilities.[23]
- Customers are and will be funding multiple, large-scale transmission projects at an indeterminate cost (believed to be many billions of dollars) whose primary

[21] *See generally* Case 18-E-0138, *Proceeding on Motion of the Commission Regarding Electric Vehicle Supply Equipment and Infrastructure*. *See also id.*, Order Establishing Electric Vehicle Infrastructure Make-Ready Program and Other Programs (issued July 16, 2020) at 68-76 and Appendix B (authorizing statewide spending on EV infrastructure incentives of $700,994,850 through 2025).

[22] *See* Case 20-E-0473, *In the Matter of Developing a Funding Mechanism for the Electric Generation Facility Cessation Mitigation Program*, Order Authorizing Funding for Electric Generation Facility Cessation Mitigation Program (issued February 11, 2021) (establishing a budget of $12.5 million per year through 2030 to be funded by electric customers statewide).

[23] *See generally* Case 18-E-0130, *In the Matter of Energy Storage Deployment Program. See also id.*, Order Establishing Energy Storage Goal and Deployment Policy (issued December 13, 2018) at 1-5 (establishing a target of 3,000 MW of qualified storage energy systems by 2030, with an interim objective of 1,500 MW of energy storage systems by 2025). The CLCPA incorporates the electric storage target of 3,000 MW by 2030. N.Y. Envtl. Conserv. Law § 75-0103(13)(E).

purpose is to increase the deliverability of renewable energy to different regions of the State (similar to the transmission projects proposed in the Petition).[24]

- Customers may be required to fund utility local transmission and distribution upgrades on a widespread basis (believed to be in the many billions of dollars) in furtherance of CLCPA targets.[25]
- Customers are and will be funding Earnings Adjustment Mechanisms for the benefit of utility shareholders at an indeterminate cost (believed to be in the hundreds of millions of dollars) for the purpose of incentivizing utilities to help achieve certain State clean energy objectives.[26]

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[24] *See*, *e.g.*, Case 12-T-0502, *Proceeding on Motion of the Commission to Examine Alternating Current Transmission Upgrades*, Order Addressing Public Policy Transmission Need for AC Transmission Upgrades (issued January 24, 2017) at 18-19 (justifying the AC Transmission projects on a need to increase transmission capacity to allow renewable generation facilities to deliver their energy to downstate load centers); Case 14-T-0454, *In the Matter of New York Independent System Operator, Inc.'s Proposed Public Policy Transmission Needs for Consideration*, Order Addressing Policy Requirements for Transmission Planning Purposes (issued July 20, 2015) at 27 (justifying the Western New York transmission project on increasing deliverability in the region to maximize output from the NYPA's Niagara hydroelectric generation facility and additional imports of renewable energy from the Ontario IESO region); and Case 20-E-0497, *In the Matter of New York Independent System Operator, Inc.'s Proposed Public Policy Transmission Needs for Consideration for 2020*, Order Addressing Public Policy Requirements for Transmission Planning Purposes (issued March 19, 2021) at 1-4 (justifying future transmission projects in and between Long Island and New York City to facilitate deliverability of offshore wind generation).

[25] *See generally* Case 20-E-0197, *Proceeding on Motion of the Commission to Implement Transmission Planning Pursuant to the Accelerated Renewable Energy Growth and Community Benefit Act*, Order on Phase 1 Local Transmission and Distribution Project Proposals (issued February 11, 2021). *See also id.*, Filing by National Grid (dated November 8, 2021) (proposing $718.945 million in compliance projects), Filing by NYSEG (dated December 23, 2021) (proposing $1.944 billion in compliance projects).

[26] *See generally* Case 14-M-0101, *Proceeding on Motion of the Commission in Regard to Reforming the Energy Vision*, Order Adopting a Ratemaking and Utility Revenue Model Policy Framework (issued May 19, 2016) at 53-93 (discussing and then mandating the use of EAMs).

- Customers are and will be funding out-of-market payments at an indeterminate cost (believed to be substantial) to incentivize Distributed Energy Resources ("DER") through net energy metering arrangements and "value stack" compensation.[27]

In addition to the customer-funded programs and initiatives detailed above, some of which may be expanded and/or extended in the future, the Commission should consider when evaluating the Solar Roadmap, *inter alia*, (i) rapidly-increasing wholesale electricity and natural gas prices being borne at this time, and (ii) the very-challenging economic conditions caused by the COVID-19 pandemic and its aftermath.[28]

Based on extensive and substantial financial commitments already imposed on customers by the Commission, there are very real questions as to (i) whether customers can afford these ever-increasing obligations, (ii) the impacts that rising electric costs will have on the State's economy and competitive position vis-à-vis other states and countries in terms of attracting and retaining energy-intensive businesses, jobs, and related capital investments, and (iii) the impact of high electric costs on State efforts to promote and increase electrification of the transportation and building sectors.[29]

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[27] *See generally* Case 15-E-0751, *In the Matter of the Value of Distributed Energy Resources*. *See also id.*, Order on Net Energy Metering Transition, Phase One of Value of Distributed Energy Resources, and Related Matters (issued March 9, 2017) (addressing, and providing exemptions to, an eventual transition from net energy metering, and also establishing value stack compensation for certain DERs).

[28] With respect to rising wholesale electricity and natural gas prices, the NYISO reported at its Management Committee meeting held on February 23, 2022 that: (a) the average cost of energy and ancillary services in New York in 2021 was $47.59 per MWh, compared to $25.70 per MWh in 2020; (b) statewide energy and ancillary services skyrocketed in January 2022 to $137.49 per MWh; and (c) natural gas prices in January 2022 were up 278.6% year-over-year. *See* NYISO, *NYISO CEO/COO Report* (dated February 23, 2022) at Slides 3, 5.

[29] If New York is serious about electrifying the transportation and building sectors, then the last thing it should be doing is placing significant upward pressure on electric costs. The higher

For the foregoing reasons, the Commission should evaluate the very significant proposed cost impacts of the Solar Roadmap and determine whether those costs are justified, and if not, reject or modify the proposed budget as necessary to protect customers. In isolation, the Solar Roadmap is prohibitively expensive, particularly in comparison to the costs associated with the recent, prior 3 GW increase to the target. When evaluated in conjunction with all of the other programs and initiatives that customers already are or will be required to fund, the potential imposition of additional costs of such magnitude is extremely troubling. At a bare minimum, the Commission has a duty to conduct a comprehensive analysis of the aforementioned programs and the proposed Solar Roadmap on a utility-specific and customer-specific basis, so that the full impact of these massive expenditures are understood at the customer level and mitigated to the maximum extent possible.

CONCLUSION

For all the foregoing reasons, Multiple Intervenors urges the Commission to carefully scrutinize the Solar Roadmap to determine whether the proposal is cost-effective and/or should be rejected or modified in order to ameliorate cost impacts on customers.

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the cost of electric service, the more expensive electrification efforts will become and the less likely they will be to succeed.