



March 12, 2018

Kathleen H. Burgess
Secretary
State of New York
Public Service Commission
Three Empire State Plaza
Albany, NY 12223

Re: Case 18-E-0018 – In the Matter of Proposed Amendments to the New York State Standardized Interconnection Requirements (SIR) for Small Distributed Generators.

NYSEIA Comments on 11/27/17 Department of Public Service Proposed Redline of the "New York State Standardized Interconnection Requirements and Application Process For New Distributed Generators and Energy Storage Systems 5 MW or Less Connected in Parallel with Utility Distribution Systems"

Dear Secretary Burgess:

NYSEIA respectfully wishes to submit the following comments on the proposed changes to the New York SIR on behalf of its member companies. The attached comments are in addition to those we have submitted with the Joint Utilities under a separate cover.

These comments are focused on the technical Appendix G of the SIR, and are included as highlighted, tracked changes to the DPS Staff redline from November

27th. The comments include suggested revisions of the language in screens B, C, D, E, F, G, H, and I on topics including:

1. effective grounding,
2. the application of the stiffness factor screen for inverter based DER like solar PV,
3. the use of minimum daytime load for solar PV in the supplemental penetration screen,
4. the application of the IEEE 1453 standard for visible flicker and in particular the setting of the emissions limit
5. the need to test for violations of ANSI C84.1 voltage limits as part of supplemental review
6. the application of a screen for the impact on voltage regulation devices from variations in output from intermittent renewables, and
7. modifications to the screens on system protection and operating limits.

Rigorously supported up-to-date technical screens are essential to the successful interconnection of DG facilities to New York's distribution grid so that projects with minimal impacts on the distribution system are not unnecessarily driven to the time and expense of a full study, and because the standards referenced in these screens also drive the upgrades required and costs when a full study is required. While some of the proposed changes are intended to clarify the language in the SIR, others are more technically substantive.

In support of the later, we are also including the solar industry responses to a series of questions posed by the leadership of the Interconnection Technical Working Group on February 1, 2018 concerning our recommended changes to screens F and H. In addition to this supporting material, NYSEIA notes that our recommendation to change the emission limit (Epst) for visible flicker referenced in screen H is consistent with changes to the draft IEEE 1547 standard that have occurred since the discussions surrounding the September 2017 workshop at which Pterra presented the shape factor methodology for addressing visible flicker that is otherwise employed in this screen. At that workshop Pterra presented a methodology that included a calculation of the emission limit that was consistent with that included in IEC 61000-3-7. At the time, however, there was discussion that the ongoing revisions to IEEE 1547 might include a single limit for Epst at 0.35 and it was this value that was included in the proposed screen H. However, in response to comments from stakeholders in the IEEE process, it now appears likely that the final revision of IEEE 1547 may adopt the emission limits as calculated by the methodology in IEC 61000-3-7 which have 0.35 as the minimum allowed Epst

and not the maximum (as currently employed in the proposed screen H). In order to maintain consistency with the latest IEEE standards and to avoid needlessly sending systems to detailed study when their impact on the distribution system does not warrant it as mentioned above, NYSEIA is recommending a change in the language to screen H that references the emission limit "based on IEC 61000-3-7 and included in IEEE 1547".

NYSEIA thanks you for your leadership on these important issues and looks forward to moving forward with these improved interconnection standards.

Sincerely,

Valessa Souter-Kline

Valessa Souter-Kline
Policy Coordinator,
New York Solar Energy Industries Association (NYSEIA)