January 11, 2016

Via Electronic Mail

TO:

Kathleen H. Burgess
Secretary
New York State Public Service Commission
Empire State Plaza Agency Building 3
Albany, NY 12223-1350

FROM:

Richard P. Umoff
Regulatory Counsel and Director
State Affairs
Solar Energy Industries Association
Ph: 202-556-2877
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RE: SEIA Letter in Support of the Comments of NYSEIA and IREC regarding the November 9, 2015 Redline of the New York Standardized Interconnection Requirements (Case No. 15-E-0557)

Dear Secretary Burgess,

Please see the following letter in support of the comments of NYSEIA and IREC regarding the November 9, 2015 SIR, and calling for establishment of a technical working group to operate in parallel with the SIR revision process.

Sincerely,

/s/ Richard P. Umoff
Richard P. Umoff
Regulatory Counsel and Director
State Affairs
Solar Energy Industries Association
Ph: 202-556-2877
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Dear Secretary Burgess,

The Solar Energy Industries Association (SEIA) submits this letter in response to the request for comment on the proposed modifications to the November 9, 2015 Standard Interconnection Requirements and Application Process for New Distributed Generators (SIR).[1] SEIA files this letter in support of the comments submitted by the New York Solar Energy Industries Association (NYSEIA) and the Interstate Renewable Energy Council, Inc. (IREC) in this proceeding, and calls for the establishment of a technical working group to operate in parallel with the SIR revision process.

Established in 1974, SEIA is the national trade association of the United States solar energy industry and is a broad-based voice of the solar industry in New York. Through advocacy and education, SEIA and its 1,000 member companies are building a strong solar industry to power America. There are 70 SEIA member companies in operation in New York working in all market segments – residential, commercial, and utility-scale. SEIA member companies provide solar panels and equipment, financing, and other services to a large portion of New York solar projects.[2] SEIA's member companies have been engaged in the SIR revision process to date and SEIA is a party to the proceeding.

SEIA is concerned that the modest changes proposed in the November 9, 2015 SIR redline are insufficient to address New York's anticipated levels of distributed energy resource (DER) penetration, and will lead to a slowdown in market growth and possibly significant market disruption if not improved. Additionally, SEIA has grown increasingly concerned about the lack of transparency and stakeholder input throughout this proceeding to date. Therefore, SEIA urges the Commission to adopt the proposals put forth by IREC and NYSEIA to improve the SIR, and calls on the Commission to ensure increased stakeholder participation by directing the Department of Public Service (DPS) to establish a robust stakeholder process to address interconnection improvements moving forward.

Finally, SEIA recommends that a technical working group be established in parallel with the SIR revision process. Although a well-executed SIR revision will unquestionably facilitate reductions in both cost and timeline for integrating DER, some of the most significant barriers to meeting statewide goals for distributed generation are the result of complex technical policies that cannot - and should not - be addressed in the context of the SIR revision. As it stands today, some of the most restrictive aspects of interconnection in New York are blanket technical standards that simultaneously burden DER applicants

[1] Case No. 15-E-0557

[2] The comments herein represent the views of SEIA and not any individual member company.

with cost-prohibitive upgrades on a project-specific basis, and limit the maximum amount of DER that can be installed on the system at a macro level.

As a case in point, Orange and Rockland (ORU) currently enforces a policy that DER on any given circuit may not exceed the minimum load of that circuit. With this policy in place, ORU cannot achieve greater than 25% distributed renewable generation in its service territory. Similarly, National Grid enforces a policy that DER on a given substation may only exceed two-thirds of minimum load once an applicant has installed a transmission protection scheme costing approximately $500,000. With this policy in place, National Grid cannot achieve greater than 16.6% distributed renewable generation in its service territory without retrofitting each substation with equipment that proves cost-prohibitive for most DER projects.

In light of these challenges, DPS should convene an on-going Technical Review Group tasked with aggregating utility interconnection standards, integration practices, and technical policies, searching for state-wide best practices, and removing unnecessary barriers to integration. The Technical Review Group should be comprised of technical representatives with relevant expertise and decision-making authority from the joint utilities, DER development community, and other applicable stakeholder organizations. In 2013, the Massachusetts Department of Public Utilities formed a similar group to identify and overcome technical interconnection challenges. In its first three years, the group has been successful in consolidating policies across utilities, removing several significant overly-burdensome practices, and publishing public technical guidelines for customers in the state.

SEIA appreciates the opportunity to weigh in on this matter, and looks forward to working with Staff on improving New York's interconnection process to facilitate the State's renewable energy goals.

Respectfully Submitted,

/s/ Richard P. Umoff
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