



To: Kathleen H. Burgess, Secretary
New York State Public Service Commission
Empire State Plaza Agency Building 3
Albany, NY 12223-1350 December 5, 2016

From: Valessa Souter-Kline
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RE: Joint Petition for Modifications to the New York State Standardized Interconnection Requirements and Application Process for New Distributed Generators 5MW or Less Connected in Parallel with the Utility Distribution Systems (Case 16-E-0560)

Dear Secretary Burgess,

The undersigned organizations submit this letter in strong support of the September 30th, 2016 Joint Petition for Modifications to the New York State Standardized Interconnection Requirements and Application Process for New Distributed Generators 5MW or Less Connected in Parallel with the Utility Distribution Systems herein the “Queue Management Petition” (Case Number 16-E-0560). The Queue Management Petition identifies critical next steps for improving the Standardized Interconnection Requirements (SIR) process, which will allow distributed generation projects to move more successfully and effectively through the process and will also increase the accuracy of the SIR interconnection queue as an indicator of market development in New York.

The Queue Management Petition addresses the existing backlog of distributed generation project applications in the queue, also adding important requirements and tools to the SIR to improve the process going forward. By establishing requirements for demonstrating project maturity and applying timelines consistent with the SIR, as updated on April 29, 2016 (Updated SIR), to projects submitted prior to that date, the Queue Management Petition will remove inactive applications and require project maturity for queue entry in the future, while facilitating the advancement of active projects to construction.

Specifically, the undersigned organizations support the following components of the Queue Management Petition:

- **Property Owner Consent and Site Control.** These sequential threshold requirements protect property owner interests and ensure that the utility's resources are deployed efficiently. We further recommend that the proposed requirement for site control demonstration at the time of CESIR payment be applied to all projects in the queue, not only to projects submitted after April 29. Expanded proof of site control will further the overall objectives of the Queue Management Petition by maximizing the potential feasibility of all projects receiving a utility CESIR study.
- **Binding Timelines for Developer Decisions.** Applying decision making deadlines will expedite the development process, and in turn, the exercise of removing dormant or disqualified applications from the queue. Applying the proposed "waterfall" structure further affords developers some insight into the queue ahead of them without compromising the primary objective of ensuring that mature projects advance through the process to construction.
- **Extensions for Committed Projects with Local Permitting Moratoria.** This limited extension for projects under development in jurisdictions with a solar moratorium in place acknowledges on-the-ground limitations in many municipalities and ensures that developers may hold their position in the queue for up to one year if they make a significant investment in the project through payment of 25% of their interconnection upgrade costs. Though not stated explicitly in the petition, it should be clarified that the moratorium extension encompasses projects where no upgrade payments are necessary. Where a 25% payment is not required, the significant investment threshold is met by a signed interconnection contract. This provision will ensure that otherwise viable projects are not unnecessarily removed from the queue for reason outside their control.
- **Interim Limited Mandatory Cost Sharing Mechanism.** We strongly support the proposed interim cost sharing mechanism included in the Queue Management Petition. While not a panacea for all the high upgrade costs faced by many DER developers, the proposed mechanism is a first step toward socializing the expenses associated with retrofitting the distribution system to operate bidirectionally, and to facilitate the decentralized generation model imagined in a REV future. We encourage the Commission to incorporate this component of the Queue Management Proposal and respectfully request that a more holistic cost causation analysis and further allocation measures be explored within both the Interconnection Policy Working Group and the Interconnection Technical Working Groups.

Finally, we wish to highlight the importance of moving the queue management petition forward in December, both to allow projects to progress and to enable effective coordination with concurrent Public Service Commission proceedings. Catalyzing the queue management process prior to implementation of the Value of Distributed Energy Resources proceeding is essential for solar project development.

In summary, we greatly appreciate the efforts of the members of the Interconnection Policy Working Group in drafting the Queue Management Petition. In concert with the pre-application process, binding timelines of the Updated SIR, the project maturity requirements and cost sharing, the items in the Queue Management Petition will significantly improve the interconnection process, benefiting



developers, utilities and residents alike. Streamlining utility interconnection is an important step towards re-envisioning New York's electric grid under REV, efficiently integrating renewable power to facilitate progress toward the State's clean energy goals.

Respectfully submitted,

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