STATE OF NEW YORK
PUBLIC SERVICE COMMISSION

Petition of New York State Energy Research and Development Authority Requesting Additional NY-Sun Program Funding and Extension of Program Through 2025	**Case 19-E-0735**

Comments of New York Solar Energy Industries Association Regarding Coalition for Community Solar Access Request for Rehearing

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New York Solar Energy Industries Association Comments
to New York State Public Service Commission
Regarding Coalition for Community Solar Access Request for Rehearing
Case 19-E-0735

Comments in Support of Coalition for Community Solar Access Request for Rehearing

The New York Solar Energy Industries Association (NYSEIA) respectfully submits these comments in support of the rehearing request regarding the Expanded Solar For All (E-SFA) Program, submitted by the Coalition for Community Solar Access (CCSA) in *Case 19-E-0735-Petition of the New York State Energy Research and Development Authority Requesting Additional NY-Sun Program Funding*, filed on February 22, 2022.

Founded in 1994, NYSEIA is a not-for-profit industry trade association with a mission to advance and accelerate the deployment of distributed solar energy and energy storage in New York State. We proudly represent hundreds of distributed solar and storage businesses that employ thousands of workers throughout the solar value chain. Our members are working every day to help achieve the ambitious clean energy and equity goals outlined in the Climate Leadership and Communities Protection Act (CLCPA).

The rehearing petition filed by CCSA is narrow in scope and relates to a specific determination of the Public Service Commission in its January 20, 2022 Order that prohibits eligible customers from simultaneously participating in the E-SFA Program and a community distributed generation (CDG) project. NYSEIA supports CCSA's request to allow for simultaneous enrollment.

Enabling simultaneous participation in both E-SFA and CDG increases energy equity, customer choice, and the potential savings directed to eligible low-income customers and disadvantaged communities (DAC). This type of "dual participation" brings greater harmony to the market in National Grid service territory and maximizes customer benefits; National Grid customers enrolled in rate assistance programs should not be barred from receiving potentially increased benefits from CDG due to their auto-enrollment in the E-SFA program. Simultaneous enrollment will also prevent undermining confidence in the recently expanded NY-Sun program.

Should the Public Service Commission approve this rehearing request, we urge for a clear implementation schedule and clarity for customers and CDG providers about how the two offerings will be implemented.

NYSEIA appreciates the opportunity to provide comments on this matter. Please contact NYSEIA Executive Director Zack Dufresne at zack@nyseia.org with any questions.

Respectfully Submitted,
New York Solar Energy Industries Association
By: */s/ Zack Dufresne*, Executive Director
May 23, 2022