



March 7, 2022

Hon. Michelle L. Phillips, Secretary  
New York State Public Service Commission  
Three Empire Plaza  
Albany, New York 12223-1350

Re: Case Number: 21-E-0629 – “In the Matter of the Advancement of Distributed Solar”

Dear Secretary Phillips:

On behalf of Climate Jobs NY (CJNY), a coalition of labor unions that represents 2.6 million workers in our state, I am pleased to submit this letter of support for the Distributed Solar Roadmap developed by the New York State Energy Research and Development Authority (NYSERDA) and the NYS Department of Public Service (DPS). This initiative is fully in line with CJNY’s core priorities – addressing the climate crisis and inequality through ambitious climate policies that spur high-quality job creation and economic development.

New York State’s distributed solar program has been very successful. Solar projects representing 93 percent of the original 6-GW-by-2025 goal are either completed or in the pipeline, and 12,000 jobs in the solar industry have been created. The Roadmap’s aggressive goals to grow the NY-Sun program and to procure an additional 4 GW of solar by 2030 are expected to create an additional 6,000 solar jobs.<sup>1</sup>

We applaud the State’s forward-thinking policies that call for prevailing wage on solar projects between 1 MW and 5 MW in size. Proper enforcement of this wage standard will ensure that many of the thousands of new solar industry jobs will be well-paid, family-supporting positions with responsible contractors.

In addition to supporting workers and their families, jobs paid at prevailing wage also have been proven to contribute to local economies. Studies show that, for every \$1 spent on a prevailing wage project, at least \$1.50 in economic activity is generated in the local community.<sup>2</sup> Prevailing wage standards also are much more likely to drive the use of apprenticeship and pre-apprenticeship programs,<sup>3</sup> which often target recruitment toward

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<sup>1</sup> New York’s 10 GW Distributed Solar Roadmap: Policy Options for Continued Growth in Distributed Solar, Case 21-E-0629, In the Matter of the Advancement of Distributed Solar, December 17, 2021.

<sup>2</sup> Frank Manzo IV and LeNee Carroll, [Why Prevailing Wage Laws are the Best Deal for Taxpayers](#), August 11, 2014.

<sup>3</sup> Peter Philips, [Kentucky’s Prevailing Wage Law](#), 2014; Cihan Bilginsoy, Wage Regulation and Training: The Impact of State Prevailing Wage Laws on Apprenticeship, 2003.

individuals from marginalized communities.<sup>4</sup> These benefits accruing from the prevailing wage policy are all in accordance with the goals of the Climate Leadership and Community Protection Act (CLCPA).<sup>5</sup>

Notably, strong solar industry growth is not at odds with strong wage standards. There is evidence that higher wages due to prevailing wage do not slow solar demand.<sup>6</sup> For example, in New Jersey, prevailing wage has applied to solar projects 1 MW or greater that receive renewable energy credits (REC) since 2013. From 2013 to 2020, total MW represented by solar projects of 1 MW or greater registered in the New Jersey's Solar REC (SREC) program increased 125 percent, from just under 300 MW to 675 MW.<sup>7</sup> New Jersey ranks seventh nationally in solar electric capacity.<sup>8</sup>

Other states have also implemented prevailing wage laws that apply to renewable energy projects. In 2021, Connecticut passed a law requiring prevailing wage on all renewable energy projects 2 MW or larger.<sup>9</sup> Illinois also passed a law calling for prevailing wage on non-residential renewable energy projects that receive state RECs.<sup>10</sup>

The Distributed Solar Roadmap will create thousands of good clean energy jobs, pre-apprenticeship and apprenticeship opportunities, and community economic benefits. The Roadmap will also ensure that the State's transition to clean energy is inclusive, with at least 40% of the additional 4 MW of installed solar targeted toward low- and moderate-income residents, affordable housing, disadvantaged communities and environmental justice communities.

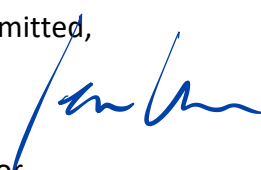
In addition, the implementation of the Roadmap will help the State reach its goal of generating 70% of its electricity from renewable energy resources by 2030 and achieving a zero-carbon grid by 2040, as required by the CLCPA.

For all of these reasons, CJNY supports the Distributed Solar Roadmap and urges the Public Service Commission to approve this critical initiative.

Thank you for your attention to this important matter.

Respectfully submitted,

Jeff Vockrodt  
Executive Director



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<sup>4</sup> Lindsey Wilkinson and Maura Kelly, [Evaluation of Pre-Apprenticeship and Retention Services in the Construction Trades in Oregon](#), 2017; [NYC Building Trades Launch New Apprenticeship Program](#), Real Estate Weekly, October 2, 2020.

<sup>5</sup> [Climate Leadership and Community Protection Act](#), 2019.

<sup>6</sup> Betony Jones, [Prevailing Wage in Solar Can Deliver Good Jobs While Keeping Growth on Track](#), November 12, 2020.

<sup>7</sup> New Jersey Board of Public Utilities, New Jersey Solar Installations Report as of 9/30/21 (Annual Capacity).

<sup>8</sup> Solar Energy Industries Association, [Top 10 Solar States](#)

<sup>9</sup> [S.B. 999](#)

<sup>10</sup> In addition to residential solar, solar projects under 100 kw on houses of worship also are exempt.