STATE OF NEW YORK
PUBLIC SERVICE COMMISSION

In the Matter of Modifications to the New York State Standardized Interconnection Requirements and Application Process for New Distributed Generators and/or Energy Storage Systems 5 MW or Less Connected in Parallel with Utility Distribution Systems	)))))	Case 24-E-0621

JOINT UTILITIES' TIMELINE PROPOSAL REGARDING THE ISSUE OF FINAL RECONCILIATION STATEMENTS UNDER THE NEW YORK STATE STANDARDIZED INTERCONNECTION REQUIREMENTS

I. Introduction

On August 17, 2026, the New York Public Service Commission (Commission) issued *Order on Interconnection Costs and Study Timelines* (Order)[1] addressing several related items concerning interconnection costs and study timelines for distributed energy resources (DER) under the current Standardized Interconnection Requirements (SIRs).[2] The Joint Utilities[3] submit this proposal to address the Commission's directive regarding the minimum amount of time necessary to ensure the issuance of complete and accurate final reconciliation statements.

II. Reconciliation Proposal

The Joint Utilities propose extending the current timeline for the issue of final reconciliation statements to interconnection applicants from sixty (60) business days to one hundred twenty (120) business days and documenting the requirement that utility construction and installation of required system modifications be complete prior to the start of the reconciliation period. Accordingly, the Joint Utilities propose amending Section 1, Step 11 of the SIRs as follows:

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[1] Cases 24-E-0621 et al., *In the Matter of Modifications to the New York State Standardized Interconnection Requirements and Application Process for New Distributed Generators and/or Energy Storage Systems 5 MW or Less Connected in Parallel with Utility Distributions Systems*, Order on Interconnection Costs and Study Timelines (issued August 17, 2026) ("Order").

[2] *Available at* https://dps.ny.gov/system/files/documents/2026/10/24-e-0621-et-al.-sirs-effective-october-1-2026.pdf

[3] The Joint Utilities are Central Hudson Gas & Electric Corporation, Consolidated Edison Company of New York, Inc., New York State Electric & Gas Corporation, Niagara Mohawk Power Corporation d/b/a National Grid, Orange & Rockland Utilities, Inc., and Rochester Gas and Electric Corporation.

Within ~~sixty (60)~~ one hundred twenty (120) Business Days after issuance of the utility's formal letter of acceptance, ~~or~~ submittal of final as-built drawings to the utility, or upon completion of the construction and installation of the required system modifications, whichever occurs last, the utility shall prepare and submit to the applicant a final reconciliation statement of its actual costs less any CESIR and construction advance payments made by the applicant.

The Joint Utilities presented this proposed modification to the Interconnection Policy Working Group (IPWG) on October 19, 2026, as required by the Order.[4] IPWG stakeholders, which includes members from the DER developer industry, New York Solar Energy Industry Association (NYSEIA), New York State Energy Research and Development Authority (NYSERDA), and the New York State Department of Public Service, did not raise substantive concerns.

The objective of this proposed modification to the SIRs is to enable complete and accurate final reconciliation statements within the appropriate time constraints. To complete an allocation analysis and ensure utility costs in support of an interconnection customer's DER project are not inappropriately shifted to utility customers, the reconciliation process can take more than the current 60 business day requirement of the SIRs. This proposed modification aligns reconciliation requirements with utility operational practices and the effort and time required for work order closeout, invoice submittals and validation, payment cycles, and cost allocation. Furthermore, adding completion of the construction and installation of required system modifications as an additional trigger for commencement of the reconciliation period clarifies that the reconciliation process does not affect permission to operate or energization timelines for interconnecting customers.

While each utility has its own systems, process steps, and timelines, there are several common factors that underpin the need for a timeline extension. Costs are generated and recorded through operational activities and work management records. Upon closure of those records, the costs are processed through utility financial and accounting systems for review and validation.

Project costs can take considerably more than 30 business days to become available for reconciliation after all work is completed for a given project. For example, time entry may occur on a weekly, bi-weekly, or monthly basis depending on a given utility's practices and procedures. Monthly time entry could be captured more than 30 days after the project is interconnected depending on the pay cycle. The process for vendor and third-party invoices to be received, verified, and paid can take considerably more than 60 business days. Only upon aggregation of all costs and associated records can the reconciliation step commence

[4] Order at 29.

incorporating the necessary analysis, review, approval, and governance (e.g., designation of authority for invoice or refund approvals). This step alone can take up to 40 business days.

In addition, DER interconnection projects have increased in complexity which is largely driven by cost-sharing, substantial station upgrades, and more extensive distribution upgrades. This results in additional utility time to research, validate, and reconcile multiple scopes of work for projects that have cost-sharing obligations. Because the reconciliation process can extend further for complex projects, extending the window to 120 business days is more reflective of the time necessary to capture, validate, and allocate a project's actual costs, supporting an accurate final reconciliation statement and the appropriate recovery of project costs.

Additionally, if adopted, this modification would bring the reconciliation timelines of the SIRs in closer alignment with neighboring jurisdictions such as Rhode Island which is 90 business days after all relevant utility work requests are closed and Massachusetts which is 120 business days. As in New York, the Massachusetts reconciliation timeline may commence prior to closure of all utility work requests in certain circumstances.

III. Conclusion

For the reasons discussed herein, the Joint Utilities respectfully request that the Commission approve the proposed amendment to Section 1, Step 11 of the SIRs to extend the timeframe for issuing final reconciliation statements from sixty (60) business days to one hundred twenty (120) business days. The Joint Utilities will continue to work with the IPWG in satisfying the other obligations of the Order.

Dated: November 16, 2026

Respectfully submitted,

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