

demand from central generation, and can be considered an efficiency improvement (from the perspective of this proceeding).

As well documented by Dr. Richard Perez, an internationally acclaimed solar radiation scientist based at University of Albany, New York is fortunate to have maximum solar radiation, and therefore maximum PV electricity output, coincident with our summer peak load electricity requirements. On hot, sunny, summer days when New York utilities experience their highest peak load demand, PV's produce their highest annual electricity output. As a result, increased deployment and use of PV, especially in the New York City area, could (and should be) a key component of future peak load reduction strategies, both for fast track programs and over the longer term.

In addition, a sometimes over looked advantage of PV's is that they can be sited, installed, and ready to interconnect to the utility grid very quickly. Installation of a typical residential PV system can be accomplished with a two- to three- person crew and can be ready for utility inspection and interconnection within three- to five-days (and sometimes less). Installation of a typical commercial or industrial PV system can be accomplished by a slightly larger crew and can be ready for utility inspection and interconnection within a matter of weeks. Hence, increased PV deployment is ideal for a fast track program intended to achieve rapid reductions in centrally generated electricity.

To date, it takes most utilities in New York State at least 30 to 60 days (and in some cases as many as 180 days or more) to inspect and approve interconnection of PV systems. However, that appears to be unique to New York and inconsistent with practices in other states. In nearby Connecticut and New Jersey, for example, PV companies report that in many cases, utilities complete PV inspections and provide interconnection approval within 1 to 2 weeks of PV installation.

Both solar space heating and solar domestic hot water (SDHW) systems are technically proven and commercially available throughout New York State from multiple businesses and contractors. The use of solar space heating and SDHW can directly replace or offset the use of electricity for space heat and hot water.

The solar space heating and SDHW industries have been serving New York State for decades, though not much information is readily available from NYSERDA or other public sources on their market penetration and total energy output. Most any building with a south facing roof, facade, or nearby ground level location can utilize solar energy for space and/or water heating. Clearly, there are thousands of unutilized solar space and/or water heating opportunities throughout NYS.

Both solar space heating and SDHW should be included in fast track and longer-term energy efficiency initiatives. The installation times and sizes of crews needed for solar space heating and SDHW are comparable to (and sometimes a bit larger) than those

described above for PV's. These technologies can be deployed, installed, and fully operational quickly and do not require utility inspection and/or interconnection.

NYSEIA urges the Commission to include photovoltaics, solar space heating, and solar domestic hot water in both fast track programs and the longer-term efficiency initiatives contemplated in the EPS proceeding, and to dramatically increase public funding and support for expanded deployment of these technologies in New York State.

Sincerely,

A handwritten signature in cursive script that reads "Chris Donovan".

Christine Donovan
Executive Vice President