



January 7, 2013

Re: NYSEIA Comments Regarding the PSC's solicitation to Utilities for Changes to the Standard Interconnection Requirements

The New York Solar Energy Industries Association (NYSEIA) is pleased to submit these comments concerning the Standard Interconnection Requirements (SIR) in New York State. The sole purpose of NYSEIA is to be a vocal representative for the solar industry in New York State.

We thank the NY Public Service Commission and the Department of Public Service for this opportunity to comment.

Regarding the procedures and steps related to systems above 25 kW and up to 2MW's, the overarching comment is that the durations afforded the utilities for various steps in the procedure are not commercially acceptable for customers looking to make an interconnection.

This is particularly acute for those wishing to expedite projects that have been awarded grant allocations from NYSERDA, more specifically the current offering under PON 2589. That PON requires that awardees complete a project within 8 months of a notice of award. [See attached exhibit] If utilities were to take the allowable time limits afforded them in the current requirements it would make what might be otherwise viable projects infeasible given the upfront time required to navigate the interconnection process.

If New York State is committed to propagating solar generating facilities in a meaningful fashion, the various bodies that regulate, fund and implement these projects must have coordinated policies and procedures. Accordingly, it is our recommendation to change the allowable durations called out for the 25kW to 2MW categories as follows according to each respective STEP.

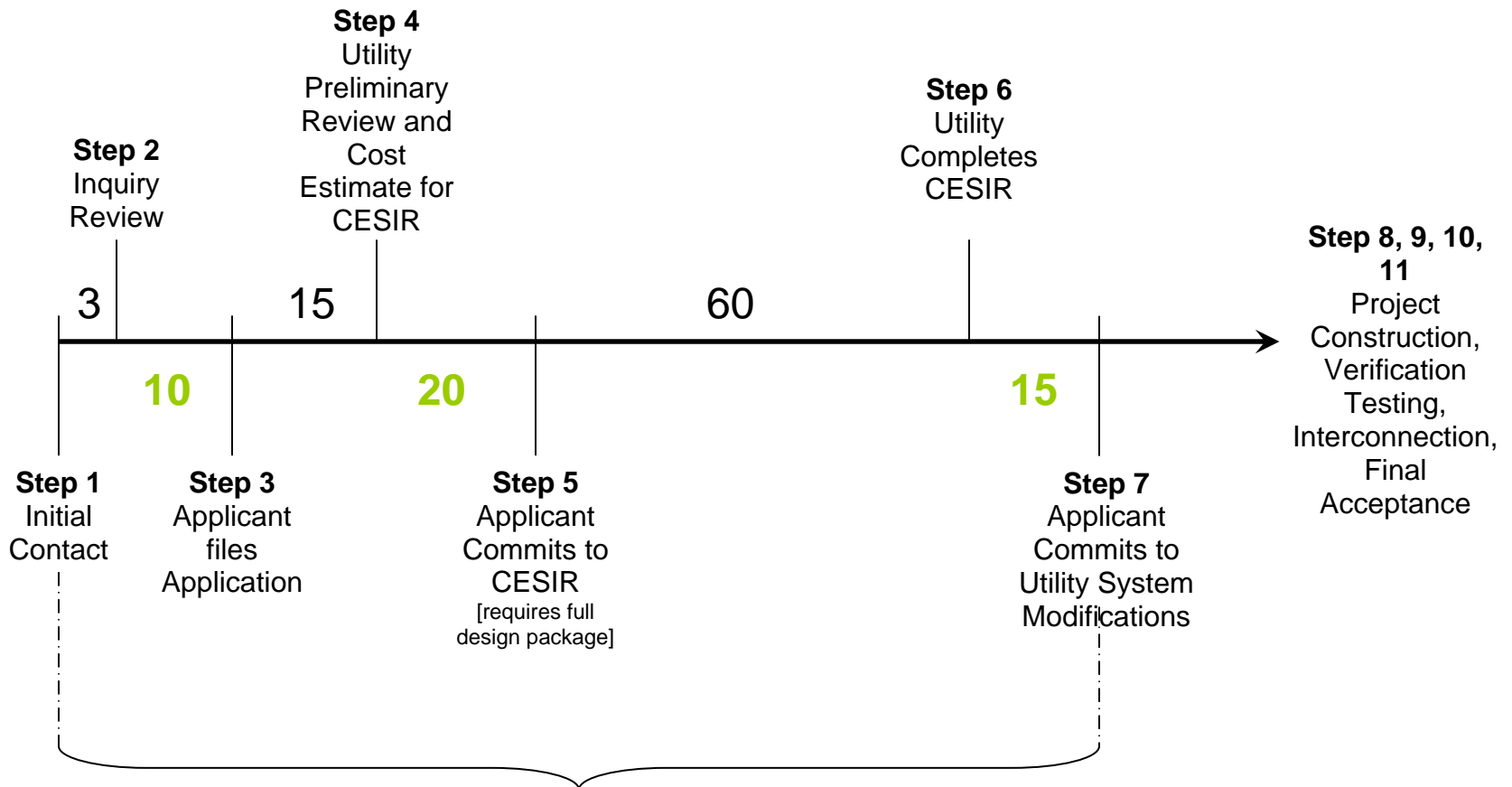
- Revise allowable duration between Step 3 and Step 4 to be 10 working days.
- Revise allowable duration between Step 5 and Step 6 to be 30 working days.

Submitted on Behalf of the NYSEIA Board of Directors,

Shaun Chapman, Vice President NYSEIA

SIR Process for Systems Greater than 25kW up to 2MW

-Mapped to Show Overall Duration-



Steps 1 through Step 7 Potential Duration per SIR is over 24 weeks, or 6 months. Leaving very little room, approximately 2 months, for construction and testing for NYSERDA projects

Lower green durations represent expedited applicant durations. Upper black durations represent Utility durations per current process.