

# Consumer Power Advocates

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New York University

March 26, 2018

## VIA ELECTRONIC FILING

Honorable Kathleen H. Burgess  
Secretary  
New York Public Service Commission  
Three Empire State Plaza  
Albany, New York 12223-1350

RE: Case 18-E-0018 - In the Matter of Proposed Amendments to the New York State Standardized Interconnection Requirements (SIRs) for Small Distributed Generators.

Case 15-E-0751 - In the Matter of the Value of Distributed Energy Resources.

Dear Secretary Burgess,

On January 11, 2018, the Commission issued the *Notice Soliciting Comments on Proposed Modifications to the Standardized Interconnection Requirements* in the above-captioned proceedings. In accordance with that Notice, CPA hereby submits reply comments in which it wishes to register its support for certain comments submitted by New York City (“the City”<sup>1</sup>.)

Consumer Power Advocates (CPA) is a coalition of not-for-profit commercial health care and educational customers in the Consolidated Edison service territory that advocates on behalf of consumer interests before the Commission, NYISO and elsewhere. CPA’s members have an active interest in installing Distributed Energy Resources (DERs) and thus an interest in ensuring the efficiency and efficacy of requirements pertaining to the interconnection of such resources to

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<sup>1</sup> / Case 18-E-0018 - In the Matter of Proposed Amendments to the New York State Standardized Interconnection Requirements (SIRs) for Small Distributed Generators, et. al., *Initial Comments of the City of New York on the Proposed Modifications to the Standardized Interconnection Requirements* (NYC Comments.)

utility distribution systems.

The City cites the policy goals set by the State and the City to significantly increase the amount of renewable and low-carbon energy used to meet the State's Clean Energy Standard ("CES") goal to have 50% of all electricity used in New York generated by renewable resources by 2030 ("50 x 30") and to reduce the State's greenhouse gas ("GHG") emissions 80 percent below a 1990 baseline by 2050, as well as the City's plan to reduce its GHG 80 percent below a 2005 baseline by 2050 ("80 x 50").<sup>2</sup>

In furtherance of these goals, the City is relying upon the introduction of substantial amounts of new DERs, DERs that will need to be interconnected using the new Standardized Interconnection Requirements (SIRs) developed by stakeholders that are the subject of this Notice and comment process.

The City states that it supports the new SIRs. It also notes that it has identified a number of additional changes that would further facilitate new interconnections. Most of which CPA supports. Specifically, the City recommends, and CPA supports, the following additional SIR elements<sup>3</sup>:

- (i) developers should be allowed to submit project documents through means other than just the Interconnection Online Application Portal ("IOAP") under certain circumstances;
- (ii) utilities should be held accountable for failure to comply with SIR deadlines;
- (iii) municipalities should be given greater flexibility to coordinate with utilities on large construction projects.

### **Alternate Data Submission Approaches**

The new SIR states that, in order to streamline the application process, documents related to a project application must be submitted through the Interconnection Online Application Portal (IOAP.) However, CPA agrees with the City that allowance needs to be made for circumstances when the IOAP does not permit a document submission. We agree with the City that "(i)n these

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<sup>2</sup> / NYC Comments at 1. CPA supports these goals.

<sup>3</sup> / Id at 2.

instances, developers should still be allowed to submit either hard or digital copies of their materials through alternative means until the IOAP can accept their documents.<sup>4</sup>

CPA agrees with the City that “the Proposed SIR include language to the effect of: “If the utility requests information from the applicant and the applicant is unable to submit the information through the IOAP, the utility may accept documents through other means, such as via first class mail or electronic mail.”<sup>5</sup>“

### **Utilities Should Face Penalties for Non-Compliance**

CPA agrees with the City that “the SIR would be more equitable to applicants if utilities faced consequences for failing to meet deadlines set forth in the SIR timeline.... The argument for reciprocal consequences is particularly valid given that Earnings Adjustment Mechanisms for DG Interconnection are currently reward-only incentives for utilities. The City respectfully submits that more symmetrical accountability for compliance with SIR deadlines would be appropriate and would reinforce the Commission’s policy objective of making the integration of DG a fundamental element of utility service.<sup>6</sup>”

### **Utilities Should Be Encouraged to Coordinate with Municipalities and Others**

Although CPA is not itself a municipality, we agree with the City that “utilities should be encouraged to coordinate with municipalities to streamline the integration of distributed generation with utility systems.<sup>7</sup>” Indeed, CPA believes that such coordination ought not be limited to municipalities, but should extend to other developers as well.

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<sup>4</sup> /Id. at 4.

<sup>5</sup> / Id.

<sup>6</sup> / Id.

<sup>7</sup> / Id at 7.

The City points out some of the benefits of such coordination:

“For example, if the City were developing an industrial park on a priority basis, it would want to work with the utility to identify system upgrades in the vicinity in advance of submitting an application to optimize the benefits of a DG interconnection. Such increased coordination has the potential to facilitate the integration of DG where it is most needed and at a lower cost.<sup>8</sup>”

CPA submits that the same is no less true for non-municipal developers.

Respectfully Submitted,

/s/

Aaron Breidenbaugh

Director of Regulatory Affairs

cc: Active Parties

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<sup>8</sup> / Id.