

**STATE OF NEW YORK
PUBLIC SERVICE COMMISSION**

Petition of the IPWG/ITWG Members Seeking Certain)
Amendments to the New York State Standardized)
Requirements (SIR) for New Distributed Generators and) Case 19-E-_____
Energy Storage Systems 5 MW or Less Connected in)
Parallel with Utility Distribution Systems)

**PETITION OF THE IPWG/ITWG MEMBERS SEEKING CERTAIN AMENDMENTS
TO THE NEW YORK STATE STANDARDIZED INTERCONNECTION
REQUIREMENTS (SIR) FOR NEW DISTRIBUTED GENERATORS AND ENERGY
STORAGE SYSTEMS 5 MW OR LESS CONNECTED IN PARALLEL WITH
UTILITY DISTRIBUTION SYSTEMS**

Central Hudson Gas & Electric Corporation, Consolidated Edison Company of New York, Inc. (“Con Edison”), New York State Electric & Gas Corporation, Niagara Mohawk Power Corporation d/b/a National Grid, Orange and Rockland Utilities, Inc., and Rochester Gas and Electric Corporation (collectively, the “Joint Utilities”) and the New York Solar Energy Industries Association (“NYSEIA”), New York Battery and Energy Storage Technology Consortium (“NY-BEST”), BQ Energy, LLC, Clean Energy Collective, Monolith Solar Associates, Cypress Creek Renewables, Borrego Solar Systems, Inc., CleanChoice Energy, Oya Solar Inc., SunCommon, GreenSpark Solar, EnterSolar, Distributed Sun, LLC, Clearway Energy Group LLC, Safari Energy, LLC, Sol Systems, Omni Navitas, Ameresco, Nexamp, Inc., Blueprint Power, US Light Energy, Best Energy Power, Delaware River Solar, Dynamic Energy, EDF Renewables North America, and Sunrun Inc., as members of the Interconnection Policy Working Group (“IPWG”) and the Interconnection Technical Working Group (“ITWG”) (collectively, the “IPWG/ITWG Members”) hereby petition the Public Service Commission

(“Commission”) for certain amendments to the October 2018 version of the *New York State Standardized Interconnection Requirements and Application Process for New Distributed Generators and Energy Storage Systems 5 MW or Less Connected in Parallel with Utility Distribution Systems* (“October 2018 SIR”).¹ The IPWG/ITWG Members have collaborated with the New York State Department of Public Service (“DPS”) Staff to develop workable solutions to improve the October 2018 SIR. This filing represents the IPWG/ITWG Members’ most recent efforts to effectuate certain amendments to the October 2018 SIR for improved overall effectiveness.

I. RECOMMENDED AMENDMENTS

A. Application Process

Project modifications introduced by applicants following the initial application and the resulting impacts on the interconnection process have been a longstanding issue not previously addressed in the SIR. Through a collaborative process, the IPWG/ITWG Members sought to develop a framework for inclusion in the SIR to establish what type of modifications could be proposed by applicants without requiring the proposed project to be removed from the utility’s interconnection queue and subsequently re-assigned in that queue where the modifications were would otherwise be acceptable without impact on other applicants and could be readily integrated into the remaining interconnection process. The inclusion of a Modifications framework in the SIR would provide clarity for applicants and utilities alike and would improve the overall interconnection process by eliminating unnecessary removal of projects with certain

¹ The October 2018 SIR was approved in Case 18-E-0018, *In the Matter of Proposed Amendments to the New York State Standardized Interconnection Requirements (SIR) for Small Distributed Generators*, Order Modifying Standardized Interconnection Requirements (issued October 18, 2018).

modifications from the utility’s interconnection queue and requiring such projects to start over in the queue.

As an applicant’s proposed project advances through the interconnection process, it is not uncommon that uncertainties associated with project development (*e.g.*, zoning/permitting challenges, equipment unavailability, changes in operating characteristics, project ownership changes) often result in some modification to the original application. The changes advanced here by the IPWG/ITWG Members will (1) mean that modifications to one project will not adversely impact other projects in the interconnection queue; (2) provide clarity to the interconnection process with resulting efficiencies in time and costs for the applicant and utility; and (3) allow a project to retain its interconnection queue position for those modifications not deemed material.

The IPWG/ITWG Members therefore propose adding a new sub-section to Section I, Application Process, of the SIR entitled “Modifications” (*i.e.*, Section I.H), provided in its entirety in Attachment 1. The purpose of this new Section I.H is to provide a formal process by which applicants shall submit a request to the affected utility through the utility’s on-line application portal or alternatively, via email, to modify initial applications. It will be the utility’s determination as to whether the proposed Modification² constitutes a Material Modification³ and the utility will be required to respond to the applicant within an established timeframe.

² “Modification” as used in this proposed new Section I.H is subsequently defined in an update to Section III, Glossary of Terms, of the SIR as a “change to the ownership, equipment, equipment ratings, equipment configuration, or operating characteristics, or schedules, of the facility described in the application” with the added caveat that “modifications altering operating characteristics or schedules may be deemed material.”

³ “Material Modification” as used in this proposed new Section I.H is subsequently defined in an update to Section III, Glossary of Terms, of the SIR as a “modification to a facility that may have adverse impacts on subsequently queued applications in the interconnection queue, or any modifications) regardless of impact to a queued project) that results in: (1) a change in the physical location of the DER such that the Property Owner Consent Form or Site Control Certification Form as required by the SIR is no longer valid; (2) a change in the PCC to a location on a different line segment or different distribution feeder for projects interconnecting to the utility’s radial system, or any change in PCC for projects interconnection to the utility’s network system; (3) an increase in the nameplate

This new Section I.H will require a new application, a new queue position, and withdrawal of the original application by the applicant if the proposed Modification is deemed to be a Material Modification and the applicant elects to move forward with the proposed Modification. In making the Material Modification determination, the utility will consider the recently developed DPS Staff guidance document entitled “*DER Material Modifications: Guidance Document*” provided in Attachment 2. This guidance document would be posted to the Distributed Generation Information page of the Department of Public Service website upon Commission approval of this proposed new Section I.H.

This new Section I.H also addresses timelines associated with proposed Modifications that are not deemed to be a Material Modification but may nonetheless impact the time for the utility to complete the Coordinated Electric System Interconnection Review (“CESIR”) process. For proposed Modifications that are not deemed to be a Material Modification but are proposed by the applicant after the utility’s completion of the CESIR, this new Section I.H requires mutual agreement between the utility and applicant on additional steps and costs.

In conjunction with this new Section I.H, definitions for “Modification” and “Material Modification” are proposed to be added to Section III of the SIR entitled “Glossary of Terms.” The definitions that will need to be added to Section III are set out on page 2 of Attachment 1. Corresponding changes that will need to be made to the Standardized Interconnection Contract section of the SIR are identified on pages 2 and 3 of Attachment 1.

kVA or kW rating of the originally proposed distributed generation facility or energy storage system of more than 2%; and (4) an additional distributed generation facility or energy storage system (other than the 2% increase described above in item (3)) not disclosed in the original application, where a separate and distinct distributed generation facility or energy storage system already exists behind the same proposed PCC or is proposed to be added at the same project site.

B. Appendix G: Preliminary Screening Analysis

1. Screens A – B

The preliminary screens currently found in the October 2018 SIR were adopted for overhead distribution system interconnections and left a void in terms of how the interconnection of proposed projects on a utility's secondary network system could be accommodated. Following some initial work by Con Edison to jumpstart an initiative to develop appropriate network screens for inclusion in Appendix G, the IPWG/ITWG Members were engaged to review and refine the proposed network screens. This effort culminated in proposed revisions to Screens A and B predominantly to address the proposed interconnection of projects to large network systems found in downstate New York.⁴

The IPWG/ITWG Members therefore propose certain revisions to Screens A and B of Appendix G, entitled Preliminary Screening, of the October 2018 SIR. Appendix G, up through and including Screen D, is provided in Attachment 3 in redlined format for ease in identification of the proposed revisions to Screens A and B.

In conjunction with these revised Screens A and B, definitions for "Network" and "Spot Network" are proposed to be added to Section III of the SIR entitled "Glossary of Terms." The definitions that will need to be added to the Glossary of Terms are set out on in Attachment 4.

⁴ Screen 3.1 of Screen B is not intended to replace the adjacent feeder fault criterion outlined in IEEE Standard 1547-2018, Standard for Interconnecting Distributed Resources with Electric Power Systems, which exists to preserve utility network operation and safeguard against inadvertent disruptions. It will be the responsibility of the utility to evaluate the applicability of this standard when presented with an application for a proposed project interconnecting to a network system.

2. Screen H

Prior to the Commission's April 19, 2018 *Order Modifying Standardized Interconnection Requirements* which resulted in the adoption of the April 2018 version of the *New York State Standardized Interconnection Requirements and Application Process For New Distributed Generators and Energy Storage Systems 5 MW or Less Connected in Parallel with Utility Distribution Systems* ("April 2018 SIR"),⁵ the ITWG had collaborated on a proposed modification to Screen H entitled "Voltage Flicker Test" in Appendix G of the SIR version then in effect. The objective of the proposed modification at that time was to standardize and better align the screen with the expected performance of a solar photovoltaic ("PV") distributed generation installation. While the proposed modification to Screen H improved the screening of solar PV projects, there remained certain cases in which the proposed modification introduced more conservative results. Through recent further efforts, the ITWG has agreed to additional calculation refinements that more accurately reflect expected system performance regarding voltage fluctuation which in turn more accurately reflects flicker concerns with respect to solar PV projects.

The IPWG/ITWG Members therefore propose to modify the voltage flicker calculations in Screen H entitled "Voltage Flicker Test" in Appendix G of the October 2018 SIR. Appendix G, up through and including Screen H, is provided in Attachment 5 in redlined format for ease in identification of the proposed revisions to Screen H.

⁵ Cases 18-E-0018 *et al.*, *In the Matter of Proposed Amendments to the New York State Standardized Interconnection Requirements (SIR) for Small Distributed Generators*, Order Modifying Standardized Interconnection Requirements (issued April 19, 2018) ("April 2018 SIR").

C. Energy Storage System (“ESS”) Application Requirements / System Operating Characteristics / Market Participation

Following the introduction of ESS in the April 2018 SIR, the ITWG began collaborations on enhanced data requirements for anticipated ESS project applications, building on experiences gained by utilities on the types of information needed to effectively process ESS interconnection applications. The result of these efforts is a proposed revision to Appendix K, entitled Energy Storage Systems (ESS) Application Preliminary Screening, of the October 2018 SIR to better reflect utility informational needs regarding ESS applications while removing the need for certain information deemed unnecessary to advance ESS interconnection applications. The changes proposed to Appendix K will better align data collection requirements with review and reporting needs in an effort to improve the ESS interconnection experience.

The IPWG/ITWG Members therefore propose certain revisions to Appendix K, Energy Storage Systems (ESS) Application Preliminary Screening, of the October 2018 SIR that significantly enhance the ESS Application Requirements. Additionally, the IPWG/ITWG Members propose the inclusion of a number of optional questions for the ESS applicant to address. The optional questions need not be answered by the ESS applicant to deem the interconnection application complete. However, to the extent the ESS applicant provides responses to some or all of the optional questions posed, this information could be insightful to the utility and may result in less stringent interconnection requirements for the applicant. This revised Appendix K is provided in its entirety in Attachment 6 in redlined format for ease in identification of the proposed revisions.

III. CONCLUSION

WHEREFORE, for the aforementioned reasons, the IPTWG/ITWG Members respectfully request the Commission's approval of these proposed amendments to the October 2018 SIR to further materially improve the SIR and the interconnection process for projects in New York.

Dated: September 5, 2019

Respectfully submitted,

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