



January 23, 2017

**VIA ELECTRONIC FILING**

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

Re: Case 16-M-0411 In the Matter of Distributed System Implementation Plans

Enclosed for filing with the Public Service Commission are the reply comments of the Natural Resources Defense Council, the Pace Energy and Climate Center, the Solar Energy Industries Association, and Vote Solar in the above-referenced proceeding.

Please contact us if you have any questions.

Respectfully submitted,

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**STATE OF NEW YORK  
PUBLIC SERVICE COMMISSION**

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**In the Matter of Distributed System Implementation Plans**

**Case 16-M-0411**

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**Reply Comments on Supplemental DSIP**

**Natural Resources Defense Council, Pace Energy & Climate Center, Solar Energy  
Industries Association and Vote Solar**

**January 23, 2017**

## Introduction and Summary

On November 23, 2016, the New York State Public Service Commission (the Commission) issued an order inviting interested parties to file comments on the Supplemental Distributed System Implementation Plan (DSIP) submitted by New York's investor-owned electric utilities.<sup>1</sup> The Commission instructed parties to submit initial comments on the Supplemental DSIP by January 9, 2017, and reply comments by January 23, 2017.

The Natural Resources Defense Council (NRDC), the Pace Energy and Climate Center (Pace), the Solar Energy Industries Association (SEIA) and Vote Solar appreciate the opportunity to provide these reply comments on the Supplemental DSIP. This document builds upon many points raised in previous filings from Clean Energy Organizations Collaborative (CEOC)<sup>2</sup> members, and was prepared with the assistance of Synapse Energy Economics, Inc.<sup>3</sup>

We find that there is significant agreement across the initial comments on the Supplemental DSIP. While the commenters generally recognize the commendable efforts of the utilities in developing the Supplemental DSIP, they consistently identify certain key areas in which the Supplemental DSIP is inadequate. These reply comments highlight the Supplemental DSIP's widely recognized deficiencies, and propose processes for curing them. The critical elements of the Supplemental DSIP in which further Commission action or oversight or needed include:

- Hosting capacity analyses
- Interconnection process
- Non-wires alternative (NWA) suitability criteria
- Forecasts of Distributed Energy Resources (DER) and load
- Data sharing standards
- Electric vehicle infrastructure development

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<sup>1</sup> Case 16-M-0411, NY PSC. Notice Soliciting Comments on the Supplemental Distributed System Implementation Plans (November 23, 2016). The Joint Utilities include Central Hudson Gas & Electric Corporation (Central Hudson), Consolidated Company of New York, Inc. (Con Edison), New York State Electric & Gas Corporation (NYSEG), Niagara Mohawk Power Corporation d/b/a National Grid (National Grid), Orange and Rockland Utilities, Inc. (O&R), and Rochester Gas and Electric Corporation (RG&E).

<sup>2</sup> The Pace Energy and Climate Center and the Alliance for Clean Energy New York co-convene an independent group called the Clean Energy Organizations Collaborative on REV-related matters. This collaborative is made up of national and state-based environmental organizations, clean energy companies and organizations, renewable energy industry trade associations, consumer groups, energy efficiency providers, and academic centers. CEOC seeks to ensure environmental outcomes that are consistent with New York's overall pollution reduction goals; break down existing barriers to clean energy services; and inform its members on market and rate design issues.

<sup>3</sup> In order to better respond to the Commission's request for comment on the Supplemental DSIP, NRDC, Pace, SEIA and Vote Solar pooled resources with the Advanced Energy Economy Institute (AEEI) to hire Synapse Energy Economics, Inc. to review the Supplemental DSIP and the initial comments on that filing. The parties then built upon Synapse's review and analysis to each further develop their own comments.

Many of the concerns raised in the initial Supplemental DSIP comments have been expressed previously in comments on the utilities' Initial DSIPs, as well as through stakeholder processes. It is now imperative that the Commission act and compel the utilities to remedy the deficiencies in the Supplemental DSIP.

We recommend that the Commission require the utilities to submit a revised Supplemental DSIP that addresses the deficiencies identified here and in our previous comments no later than July 2017. If these deficiencies are not addressed, the utilities will not meet the Commission's clearly articulated NY REV goals, and will miss important opportunities to reduce costs for New York electricity customers.

## **Key Areas of Agreement**

The initial comments on the Supplemental DSIP consistently identify certain deficient components of the Supplemental DSIP. This section briefly summarizes some of the more important areas of agreement, and offers recommendations toward addressing the Supplemental DSIP's deficiencies.

### **Hosting Capacity**

Several commenters identify ways in which the hosting capacity analysis plans contained in the Supplemental DSIP are insufficient. SolarCity points out that initial utility plans to provide hosting capacity analyses based solely on 300 kW solar photovoltaic system will result in underestimates of hosting capacity with respect to smaller, more flexible DERs.<sup>4</sup> The Interstate Renewable Energy Council, Inc. (IREC) emphasizes the lack of Supplemental DSIP details regarding plans for more advanced hosting capacity analyses.<sup>5</sup> Borrego Solar urges the utilities to revise their planning process to incorporate rigorous hosting capacity analyses as direct inputs into their distribution investment planning processes.<sup>6</sup> We support these comments and re-iterate our recommendation that the Commission adopt the hosting capacity analysis goals previously articulated by IREC,<sup>7</sup> and require the utilities to submit a revised Supplemental DSIP that provides a detailed description of a selected methodology adequate to achieve these goals. We further recommend that the Commission establish an ambitious timeline to drive the development and roll-out of increasingly advanced hosting capacity analyses.

### **Interconnection Process**

IREC and Borrego Solar correctly note that the utilities' interconnection process needs to be substantially improved and further automated in order to accommodate increasing volumes of DERs.<sup>8</sup>

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<sup>4</sup> Case 16-M-0411, SolarCity. Comments of SolarCity Corporation. (January 9, 2017) [hereinafter "SolarCity Comments"], at 4.

<sup>5</sup> Case 16-M-0411, IREC. Comments of the Interstate Renewable Energy Council, Inc. on the Supplemental Distributed System Implementation Plan. (January 9, 2017) [hereinafter "IREC Comments"], at 13.

<sup>6</sup> Case 16-M-0411, Borego Solar. Borego Solar Comments on the Joint Utilities of New York Supplemental Distributed System Implementation Plan. (January 9, 2017) [hereinafter "Borego Comments"], at 2.

<sup>7</sup> Case 16-M-0411, IREC. Comments of the Interstate Renewable Energy Council, Inc. on the Initial Distributed System Implementation Plans, at 8-9 (September 12, 2016).

<sup>8</sup> IREC Comments at 22; Borego Comments at 2-3.

These commenters also both describe how advanced hosting capacity analyses should be used to automate the interconnection process.<sup>9</sup> We strongly support these comments, and recommend that the Commission require that a revised Supplemental DSIP include detailed plans to automate the interconnection process as rapidly as possible. These plans should include a description of the role that hosting capacity analyses might play in further automation.

### **NWA Suitability Criteria**

Several commenters express concern that the utilities' proposed NWA suitability criteria may not be operationalized in a sufficiently flexible manner.<sup>10</sup> While we appreciate the utilities' assertion that they will not use the proposed suitability criteria in an entirely exclusionary way, we share the concerns of the other commenters. We therefore recommend that the Commission monitor the NWA procurement process to ensure that suitability criteria are used to prioritize rather than exclude potential projects, and that the utilities ultimately pursue all cost-effective NWA opportunities.

### **DER and Load Forecasts**

Multiple organizations' comments point out the inadequacy of the DER and load forecasting sections of the Supplemental DSIP.<sup>11</sup> We support these comments, and reiterate our concerns that current forecasts exaggerate future load and may lead to the construction of unnecessary infrastructure. We recommend that the Commission order that a revised Supplemental DSIP include revised DER and load forecasts that are based on accurate DER potential studies. We further recommend that the Commission require the utilities to continue to progress toward increasingly granular, detailed load forecasts.

### **Data Sharing Standards**

The Northeast Energy Efficiency Partnerships (NEEP) and New York City (NYC) have submitted comments opposing the 15/15 data privacy standard proposed in the Supplemental DSIP.<sup>12</sup> As stated in the comments filed by the NRDC, Urban Green Council, Pace, Vote Solar and the Association of Energy Affordability, we agree that the proposed 15/15 standard is unnecessarily restrictive, and would inhibit important public policy goals.<sup>13</sup> We therefore recommend that the Commission reject the 15/15 standard and require the utilities to adopt a building-level data aggregation threshold of two meters.

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<sup>9</sup> IREC Comments at 21; Borego Comments at 4.

<sup>10</sup> Case 16-M-0411, Acadia Center. Acadia Center Initial Comments. (January 9, 2017) [hereinafter "Acadia Comments"], at 4-5; Case 16-M-0411, New York Battery and Energy Storage Technology Consortium (NY-BEST). Comments on Supplemental DSIP (January 9, 2017) [hereinafter "NY-BEST Comments"], at 5-6; SolarCity Comments at 3.

<sup>11</sup> IREC Comments at 24-25; Acadia Comments at 3-4.

<sup>12</sup> Case 16-M-0411, NEEP. Comments on Supplemental Distributed System Implementation Plan (January 9, 2017); Case 16-M-0411, NYC. Comments of the City of New York in Response to the Joint Utilities' Supplemental Distributed System Implementation Plan (January 9, 2017), at 3-7.

<sup>13</sup> Case 16-M-0411, Natural Resources Defense Council, Urban Green Council, Pace Energy and Climate Center, Vote Solar and Association for Energy Affordability. Comments on the Supplemental Distributed System Implementation Plan (January 9, 2017).

## **Electric Vehicles**

The comments of ChargePoint and NY-BEST push for a more robust and comprehensive process to support the rapid development of electric vehicles (EVs) in New York.<sup>14</sup> We support these comments, and believe that the Supplemental DSIP does not outline a sufficiently aggressive plan for developing EV supply equipment. We reiterate our recommendation that the Commission establish clear, near-term goals for the utilities to meet as they progress toward supporting a full-scale EV market.

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<sup>14</sup> Case 16-M-0411, ChargePoint. Comments on Supplemental Distributed System Implementation Plans (January 9, 2017); NY-BEST Comments at 8-9.