





# NY Solar Industry Briefing and 2025 Policy Priorities New York Solar Energy Industries Association

February 6, 2025



## Agenda

New York's Distributed Solar + Storage Industry
Market Statistics and Trends
Current Events in NY Solar Policy
NYSEIA 2025 Policy Priorities
Q&A

New York Solar Energy Industries Association <a href="https://www.nyseia.org">www.nyseia.org</a> <a href="mailto:info@nyseia.org">info@nyseia.org</a>

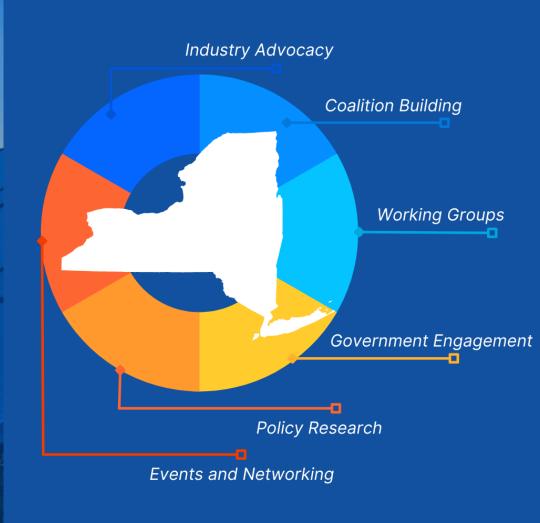
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#### About NYSEIA

# ADVANCING SOLAR ENERGY FOR NEW YORK

# NYSEIA

New York Solar Energy Industries Association (NYSEIA) advocates for sustainable growth of solar energy across New York State. Join our trade association to accelerate the solar revolution.



https://www.nyseia.org

# Opening Remarks / State of the Industry



# New York's Distributed Solar + Storage Industry

#### About New York's Solar + Storage Industry

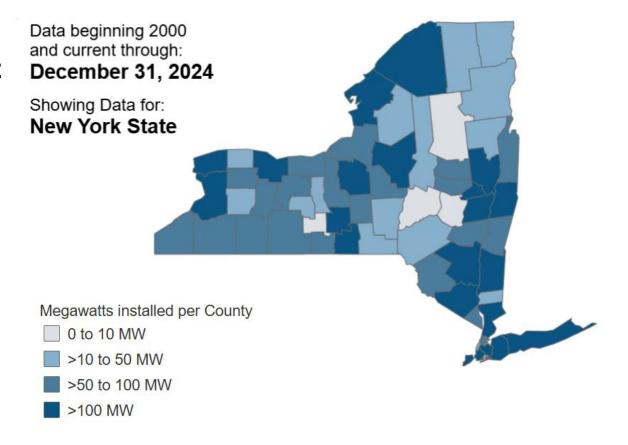
New York's rooftop and community ("distributed") solar industry is the State's **most** successful clean energy sector

The solar industry currently employs **15,490 workers** across hundreds of companies in the state (NYSERDA)

New York's distributed solar program has attracted **\$10 billion** in private-sector investment (NYSERDA)

New York has **242,056** distributed solar projects with a total capacity over **6.5 GW** 

Solar companies are increasingly incorporating **energy storage** to provide enhanced grid services, reliability, flexibility and resiliency



Graphic: NYSERDA



#### Rooftop Solar for Homes and Businesses

Solar installed on homes and businesses generates electricity for use onsite, directly reducing the customer's electricity bill.

When a rooftop solar projects generates more power than is needed, the excess is exported to the grid to serve nearby energy demand. The customer's exported solar credits are banked and used to offset electricity consumed at night and on cloudy days. This is knowns as **net metering**.

Solar projects on homes and businesses can be purchased or financed with a loan, lease or power purchase agreement.



Photo: Getty Images



#### Community Solar



**Photo: SOPA Images** 

Community solar is a model that allows hundreds of households to share in the output of an offsite local solar project.

Community solar projects are always 5 Megawatts or less. A typical community solar project is 20-40 acres.

The most common model for community solar is a subscription model: customers sign up to receive guaranteed utility bill savings from a local solar project.

The monetary value of solar energy credits are determined using the Value of Distributed Energy Resources (VDER) tariff. Subscribers receive a portion of the value on their utility bills each month.



#### Retail Energy Storage



Photo: Ninedot Energy

Community-scale ("retail") energy storage systems are an increasingly important resource for New York's electric distribution system.

Typical 5 megawatt / 20 megawatt hour retail energy storage systems charge overnight and then dispatch power to the electric grid during times of peak demand, helping balance and optimize the system while reducing reliance on fossil fuel peaker plants.

These resources are compensated with the Value of Distributed Energy Resources (VDER) tariff and function similarly to community solar projects.

Until recently, energy storage projects primarily provided bill savings to commercial customers via Remote Crediting.

New York's new Statewide Solar for All program may become a popular alternative.

#### Benefits of Distributed Solar

- → Utility Bill Savings for Families and Businesses
- → Job Creation and Economic Development
- → Revenue for Landowners and Municipalities
- → Lower-cost Pathway to CLCPA Compliance
- → Air Pollution Reduction and Health Benefits
- → Effective Use of Limited Land Resources



Photo: Dennis Schroeder / NREL



#### NY Distributed Solar + Storage Policy Framework

New York has a robust policy framework to support distributed solar + storage deployment.

New York has strong foundational policies, including:

- Net metering for onsite solar;
- Value of Distributed Energy Resources (VDER) tariff for exporting solar + storage projects;
- Standardized interconnection process and a cost-sharing framework;
- Community solar and remote crediting framework; and
- NYSERDA's NY-Sun program, which provides capacity-based incentives for diverse project types

Many of these policy frameworks precede the Climate Leadership and Community Protection Act (CLCPA), climate and renewable energy legislation that New York enacted in 2019. The CLCPA requires New York to rapidly deploy clean energy resources, with 70% renewable by 2030 and 100% renewable by 2040 requirements. The CLCPA also codified a distributed solar goal of 6 gigawatts by 2025 and 3 gigawatts of energy storage by 2030. In 2021, the Governor raised New York's distributed solar goal to 10 gigawatts by 2030. In 2022, the Governor raised New York's energy storage goal to 6 gigawatts by 2030.



#### 2024 Was a Record-Breaking Year for Distributed Solar in NY



Photo: Samantha Simmons

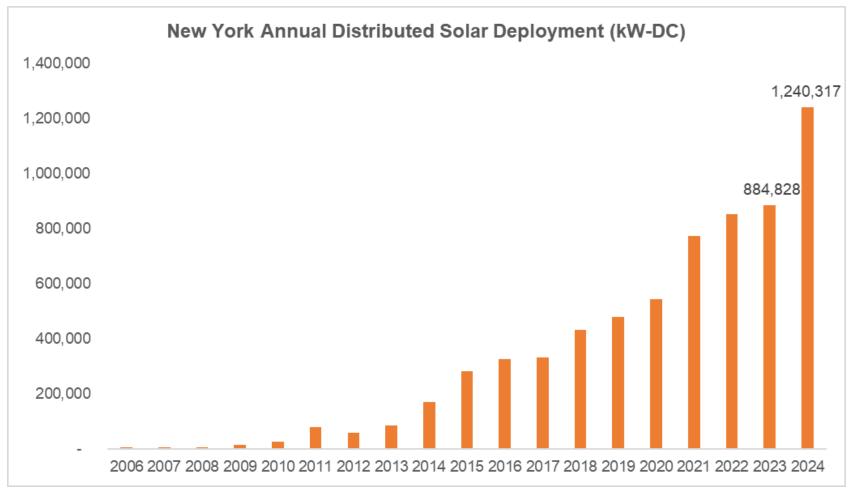
In October 2024, New York surpassed its 6 Gigawatt distributed solar goal more than a year ahead of schedule.

New York installed 1.24 gigawatts of distributed solar in 2024 – 40% more than any year prior!



#### NY Distributed Solar Deployment is Up

New York deployed more rooftop and community solar in 2024 than any prior year:

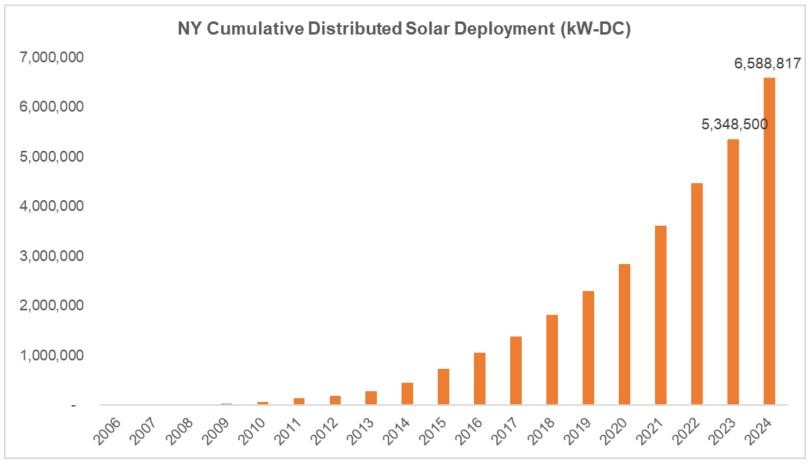






#### New York Achieved its Distributed Goal Ahead of Schedule

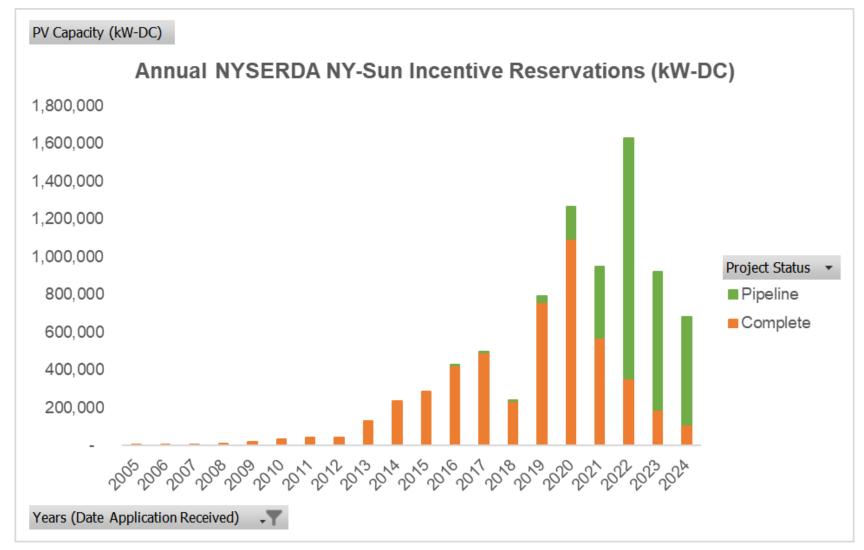
New York's cumulative installed distributed solar capacity surpassed six gigawatts ahead of schedule, and we have a mature pipeline of projects that positions us to reach the 10 gigawatt by 2030 goal ahead of schedule and under budget:



Data source: NYSERDA. February 2025.



#### New Distributed Solar Development is Declining



In 2024, new NYSERDA solar incentive reservations dropped 25% year-over-year, to the lowest level since 2018.

Community solar projects can only reserve NYSERDA NY-Sun incentives after making interconnection deposits and securing zoning approval. Projects with reservations are mature, and reservation statistics are a strong indicator of future year deployment.

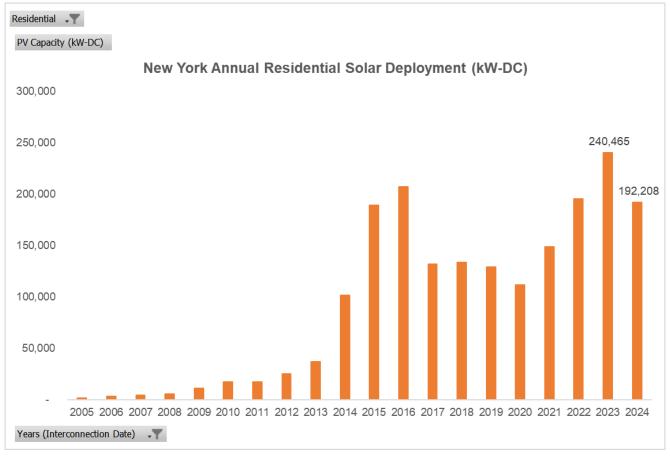
New York has 9.75 GW of completed and reserved capacity.

Data source: NYSERDA. February 2025.



#### NY Net Metered/Residential Solar Market Trends

Residential solar deployment in New York State decreased by 20% year-over-year. Every part of the state saw a drop in deployment, although it was most pronounced on Long Island. NYSEIA attributes the decline to high interest rates, inflation, declining incentives and increasing fixed charges on solar customers' utility bills, which erode household savings.

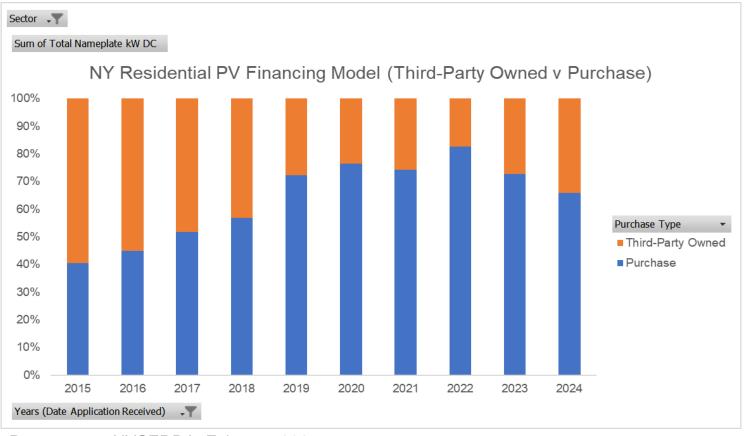






#### NY Net Metered/Residential Solar Market Trends

Approximately two thirds (66%) of New York's 2024 residential solar installations were cash purchase (cash or loan) and one third (34%) were financed with a lease or power purchase agreement\*. Third-party ownership rates have increased over the last two years in response to high interest rates, although cash purchases are still dominant in New York State.



Data source: NYSERDA. February 2025.



<sup>\*</sup>Statistics only include residential solar projects that received NYSERDA incentives.

#### Residential Energy Storage Adoption

Residential energy storage attachment rates remain low in New York, hovering just below 5% statewide. The largest residential energy storage market is Long Island, driven by time-of-day rates and available capacity-based incentives. Orange & Rockland achieved high BESS attachment rates due to a Virtual Power Plant pilot program they are implementing jointly with Sunrun. High interest rates, limited incentives, lack of price signals and permitting challenges are key barriers to residential energy storage adoption. Attachment rates will rise when NYSERDA launches incentive programs this year, and if/when NYC lifts its de facto ban against residential energy storage.

Resi BESS Attachment Rate by Utility	▼							
Year .T	Central Hudson	Con Ed	<b>National Grid</b>	NYSEG	O&R	<b>PSEGLI</b>	RGE	<b>Grand Total</b>
2020	4.8%	0.5%	3.4%	6.7%	0.2%	3.5%	4.4%	2.4%
2021	12.5%	1.7%	6.7%	13.6%	4.5%	8.4%	3.7%	5.8%
2022	7.8%	1.6%	6.7%	12.9%	14.1%	7.6%	7.1%	5.6%
2023	6.0%	0.9%	6.5%	11.9%	11.3%	3.4%	4.1%	3.5%
2024	6.8%	1.0%	3.9%	11.6%	26.5%	4.6%	6.3%	4.5%
Grand Total	7.4%	1.2%	5.5%	11.7%	12.0%	5.4%	5.3%	4.4%

Resi BESS Project Count by Utility	▼							
Year	Central Hudson	Con Ed	<b>National Grid</b>	NYSEG	O&R	<b>PSEGLI</b>	RGE	<b>Grand Total</b>
2020	37	30	33	39	2	197	8	346
2021	131	123	89	91	45	568	9	1,056
2022	138	152	96	121	165	614	25	1,311
2023	132	116	110	138	148	354	12	1,010
2024	128	109	67	113	280	347	16	1,060
Grand Total	566	530	395	502	640	2,080	70	4,783

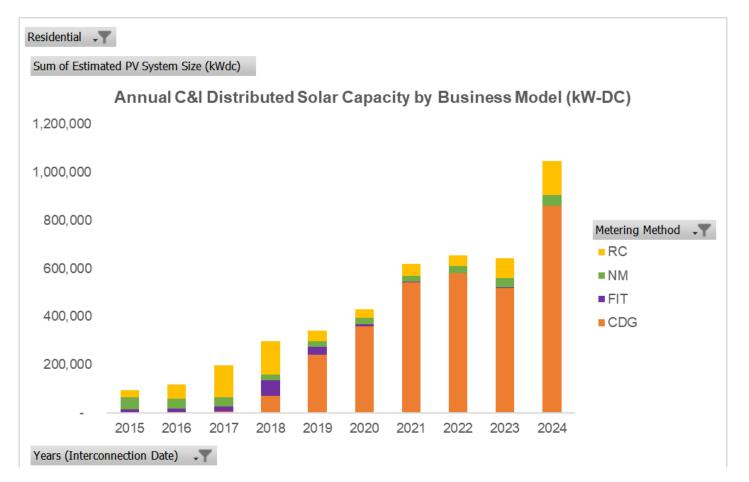




# Commercial & Industrial Market Trends

#### **C&I** Annual Deployment Trends

Upstate community solar is the dominant form of commercial & industrial (C&I) solar being deployed in New York, followed by Upstate remote crediting projects. Rooftop commercial solar (net metering) deployment is relatively limited Upstate due to NYSERDA's NY-Sun program rules, utility policies that prevent cost-effective interconnection, and electric tariffs that preference export-only projects.



2024 PV Deployment by Utility						
Utility	PV Capacity (kW-DC)					
National Grid	714,685					
NYSEG	227,922					
Con Ed	122,057					
PSEGLI	86,152					
O&R	45,644					
Central Hudson	34,091					
RGE	9,765					
Grand Total	1,240,317					

Data source: NYSERDA. February 2025.



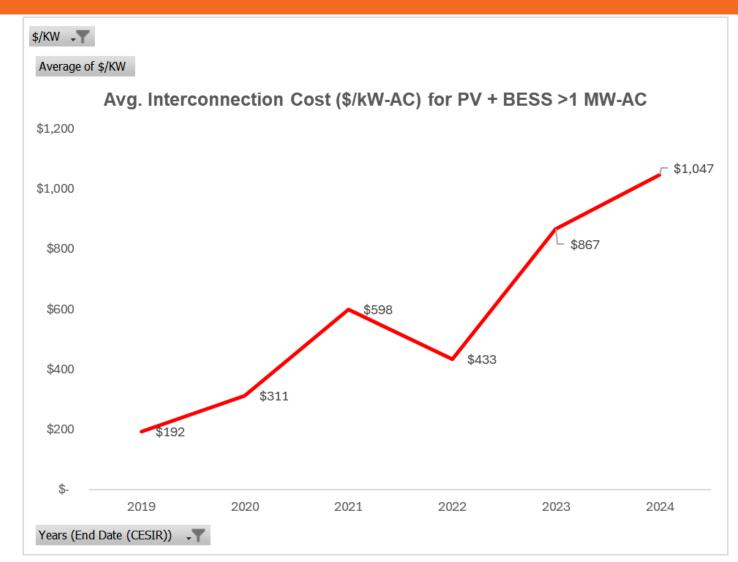


# Runaway Utility Interconnection Costs

The cost to interconnect new C&I solar + storage projects has increased dramatically in the last few years.

As interconnection costs have risen, a growing number of projects are withdrawing from the interconnection queue because the costs are prohibitively expensive.

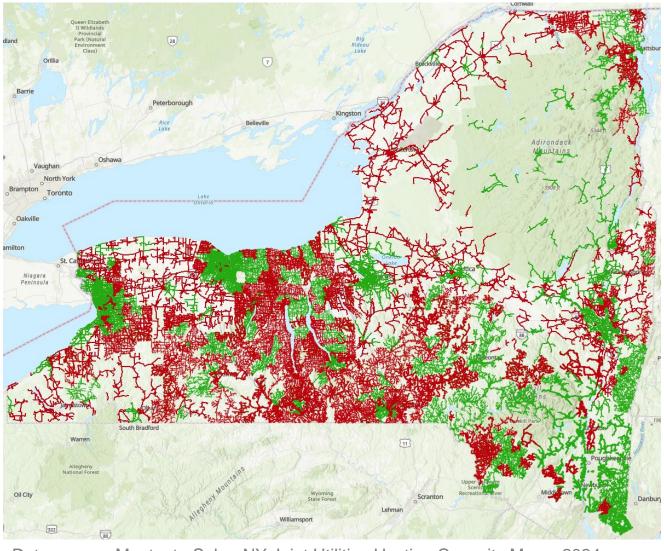
Dwindling affordable hosting capacity and rising interconnection costs are a critical barrier to sustained deployment.



Data source: New York Department of Public Service. SIR Inventory. January 2025.



# **Dwindling Hosting Capacity**

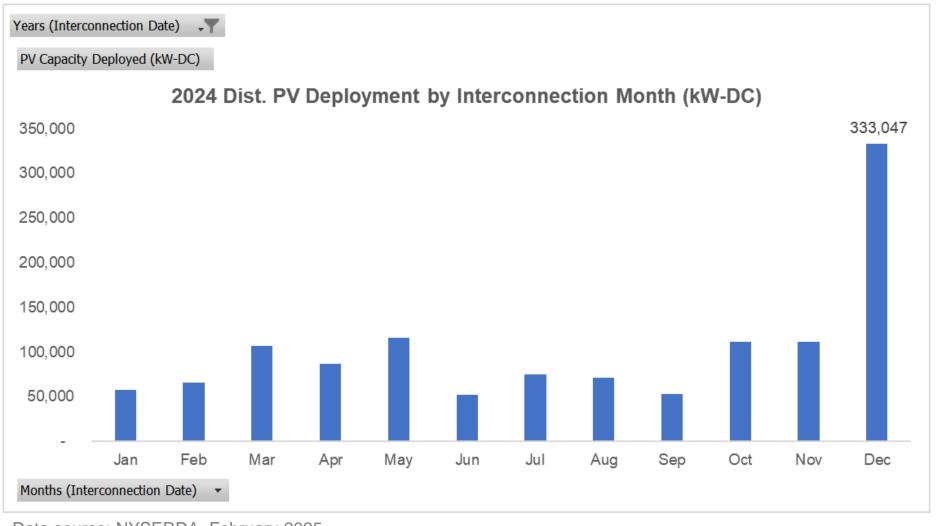






#### All I Want for Christmas is...PTO

New York commissioned a record amount of new distributed solar capacity in December 2024:





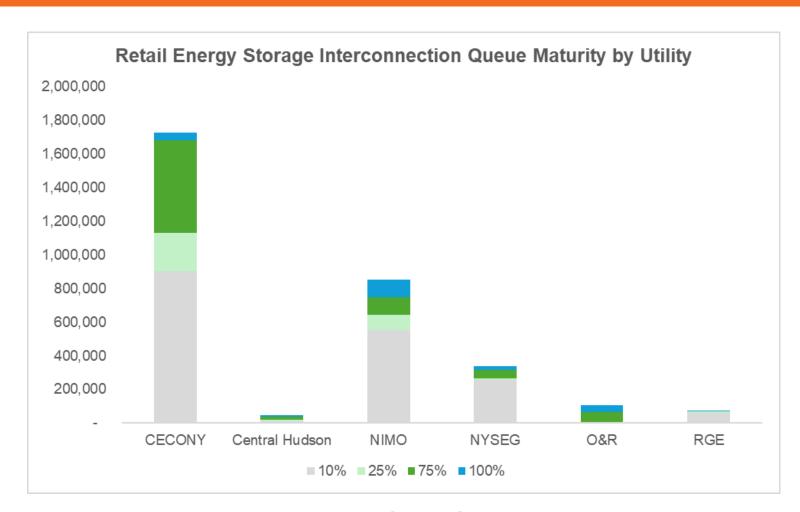
Data source: NYSERDA. February 2025.

# New York has a Robust Pipeline of Retail Energy Storage

New York has a growing pipeline of standalone retail energy storage projects.

Retail energy storage project development is concentrated in the NYC region; a region where there is not adequate land available for traditional community solar projects but where distributed energy resources can help meet peak demand for electricity.

Approximately 225 MW-AC of retail energy storage capacity is operational in New York, but there is 1.1 gigawatts of additional capacity for which the developer has made an interconnection deposit.



Data source: New York Department of Public Service. SIR Inventory. January 2025.



#### State of the NY Distributed Solar + Storage Industry

#### **Residential Solar**

- 20% year-over-year decline in annual deployment in 2024, mirroring national trends
- High interest rates and inflation are dampening customer demand
- Declining incentives and rising fixed charges on utility bills are weakening the customer value proposition
- Energy storage adoption remains modest (<5%) due to high interest rates and limited incentives/monetization opportunities

#### Commercial & Industrial ("Community") Solar

- Significant increase in annual deployment in 2024 (lagging indicator of market health due to New York's 3–4-year project development timeline)
- Major decline in new development due to interconnection and siting challenges:
  - Rising interconnection costs, inflation and declining incentives make project-economics challenging
  - Restrictive local laws, moratoria and expanded DEC regulations are eliminating viable sites

#### **Retail Energy Storage**

- Robust pipeline (> 1 gigawatt) of retail energy storage projects, concentrated in Con Edison territory
- Moratoria and safety concerns are a key barrier to deployment outside of NYC
- Awaiting a Public Service Commission Order authorizing NYSERDA's incentive Implementation Plans



# Distributed Solar + Storage Industry: Current Events and New Developments

#### Clean Energy Standard Biennial Review

On July 1, 2024, NYSERDA and the Department of Public Service filed their biennial review of the Clean Energy Standard which notes that New York has a projected 42,145 GWh shortfall of 70% renewable by 2030. The report outlines a pathway to achieve 70% renewable energy by 2033:

Table 9 Illustrative Path to 70% Goal

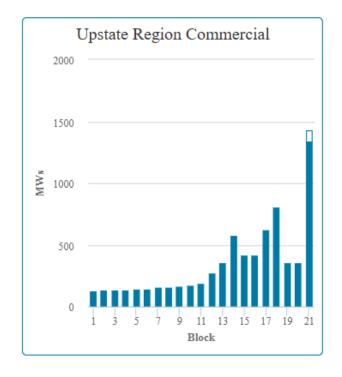
GWh, cumulative		2030	2031	2032	2033
Statewide load forecast	Base	164,910	167,130	169,630	172,390
	Low	154,880	157,100	159,600	162,360
	High	174,876	183,360	191,930	200,610
70% goal	Base	115,437	116,991	118,741	120,673
	Low	108,416	109,970	111,720	113,652
	High	122,413	128,352	134,351	140,427
Currently operational and contracted, incl 10 GW DG		73,292	73,292	73,292	73,292
Offshore wind beyond NY4		0	6,251	12,502	18,753
Distributed generation beyond 10 GW goal		1,512	2,722	3,932	5,142
Tier 1 for 6 RfPs 2024-2029 @ GWh/y		11,760	15,680	19,600	23,520
Total Renewables		86,565	97,946	109,327	120,707
Gap to 70% (base load forecast)		28,872	19,045	9,414	0

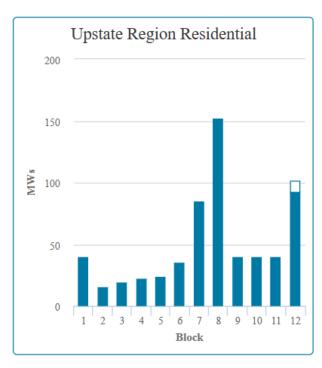
Credit: NYSERDA, DPS, July 1 2024.

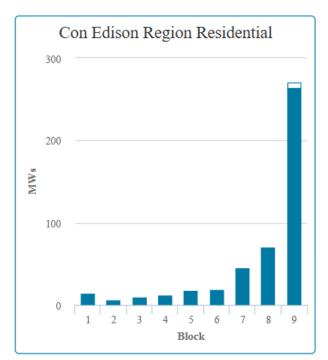


## NY-Sun Program and Pending Extension

The NYSERDA NY-Sun program offers capacity-based incentives for rooftop and community solar projects in most parts of New York. This successful program is ahead of schedule and under budget. NYSERDA filed a proposal to reinvest surplus funds into the program last year. Program capacity is almost exhausted, and the solar industry eagerly awaits action from the Public Service Commission to approve the extension (beyond 10 GW).











# Energy Storage Roadmap and Incentive Program Launch

In 2024, the New York Public Service Commission authorized residential, retail and bulk energy storage incentives/programs to achieve the state's 6 GW energy storage deployment goal.

NYSERDA published a draft implementation plan for the residential and retail sectors, featuring capacity-based incentives to support this goal.

It is not yet clear whether Long Island Power Authority (LIPA) will fully fund its share of the statewide energy storage program and enable retail energy storage development on Long Island.

NYSEIA hopes the Public Service Commission will approve the implementation plan in Q1 2025.



Image: Convergent Energy + Power



## Grid of the Future Proceeding and BTM Energy Storage

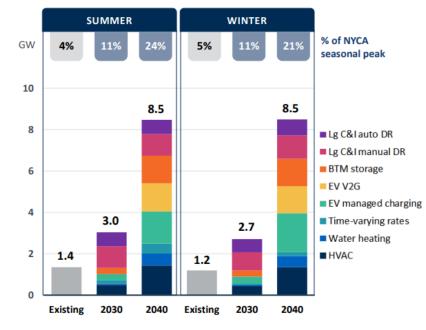
In April 2024, the PSC initiated the Grid of the Future proceeding to assess New York's "grid flexibility" potential and to advance rate design, programs, technology and investments that will reduce New York's peak demand, lower costs, boost grid reliability and enhance customer benefits.

#### **Key Components:**

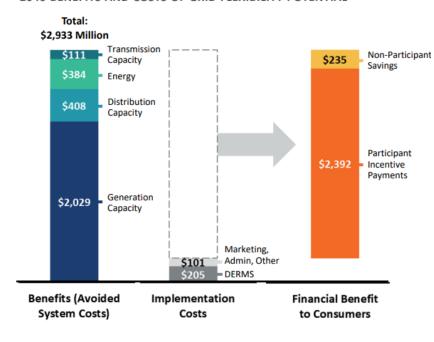
- Grid Flexibility Study: Quantified New York's "grid flexibility" potential and the \$3B in savings that could be realized through grid flexibility (released in January 2025).
- Grid of the Future Plan: A
   comprehensive strategy to advance grid
   flexibility so New York can realize the
   benefits associated with greater grid
   flexibility.

Behind-the-meter energy storage is the element of this effort that is most relevant to NYSEIA and our member companies.

GRID FLEXIBILITY POTENTIAL IN NEW YORK (GW)



2040 BENEFITS AND COSTS OF GRID FLEXIBILITY POTENTIAL



Images: Brattle Group

- 8.5 gigawatts of cost-effective grid flexibility potential by 2040
- \$2.93 billion benefits to New Yorkers in avoided costs



#### Interconnection Challenges

In December 2023, National Grid filed a petition for declaratory ruling seeking affirmation that solar and storage developers are liable for uncapped retroactive scope and budget modifications for distribution upgrades.

In July 2024, the PSC issued an Order denying National Grid's petition on narrow technical grounds.

Also in the summer of 2024, National Grid changed its methodology for cost estimation, resulting in a ~71% increase to the average cost of interconnection for solar and storage projects. The increases were implemented with no regulatory oversight and National Grid is applying them on a forward-looking and retroactive basis.

In January 2025, Altamont Road Solar LLC filed a formal complaint against National Grid for a \$1.3M interconnection cost overrun on a \$1M upgrade.

These issues have highlighted the need for increased transparency, stronger regulation of utility costs, and guardrails to allow continued investment by solar and storage companies.



Photo: Shutterstock



#### Interconnection Improvements

In 2024, the solar industry and utilities filed a joint petition to implement numerous improvements to New York's Standardized Interconnection Requirements. Upon adoption, the petition will:

- Move nonrefundable cost-sharing payments from the 25% deposit date to the 75% date to better align interconnection with NY permitting timelines;
- Improve the technical screens for small projects reduce timeline and costs
- Create granular study schedules for energy storage projects to avoid unnecessary distribution upgrades and costs

Last summer, NYSEIA also filed a petition to allow or the use of letters of credit or surety bonds in lieu of cash deposits for distribution upgrades in excess of \$500,000. We expect a Commission decision later this week!

In the fall, Tesla and ConnectDER filed a petition to allow for the use of meter socket adapters.



Photo: C-Crete Technologies



#### Flexible Interconnection Pilot Expansion

Flexible interconnection, or the use of software to monitor and control distributed energy resources (DER) in real-time, can address several hosting capacity constraints, supporting rapid DER deployment by mitigating costly grid upgrades and accelerating interconnection timelines.

#### Flexible interconnection is already working:

- National Grid and NYSEG have both implemented successful flexible interconnection pilot projects over the last decade.
- Flexible interconnection is commonplace in Europe, including in National Grid UK's service territory.
- According to a 2015 study from the German distribution company EWE Netz, the dynamic curtailment of 5% of the energy generated from solar PV increases the grid connection capacity by around 225% without new grid investment.
- NYSERDA recently contracted NYSEIA, NY-BEST and EPRI to conduct a flexible interconnection study to produce a flexible interconnect cost-benefit analysis and outline recommendations for policy implementation.
- National Grid and Avangrid are exploring expanding their pilot programs.

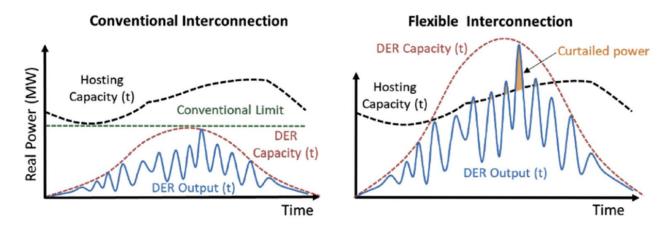


Figure 1: Conventional (Firm) vs Flexible Interconnection- EPRI

Credit: Electric Power Research Institute



## Community Solar Permitting and DEC Freshwater Wetlands

Restrictive local laws are obstructing as much as 4.6 gigawatts of otherwise viable community solar development in New York.

In December 2024, the NY 3rd District Appellate Court ruled in favor of Freepoint Solar v Town of Athens, finding that towns must evaluate zoning variance applications for solar projects using the Public Utility Standard.



Recent amendments to the Freshwater Wetlands Act dramatically expanded the Department of Environmental Conservation's jurisdiction over freshwater wetlands, further constraining solar development in New York. The new regulations went into effect on January 1st.

The DEC just issued a <u>draft general permit for community solar</u> for public comment. It is not yet clear if the permit is adequate to enable continued community solar development.



Photo Credit: Nexamp



#### **VDER Tariff Improvements**

NYSEIA and the Clean Energy Parties are continuing to engage with DPS to advocate for meaningful improvements to the VDER tariff in order to more accurately compensate solar and storage projects for the value they provide.

In August 2024, the PSC issued an Order making improvements to the Marginal Cost of Service (MCOS) study methodology. The Order directed New York's utilities to incorporate the avoided cost of transmission into the value. MCOS is the basis for deriving parts of the VDER value, and we anticipate these changes will result in increased compensation levels for community solar and retail storage projects.

There is an ongoing proceeding regarding how VDER compensation levels should be derived from MCOS.

#### Standardized Variables, Inputs, & Outputs

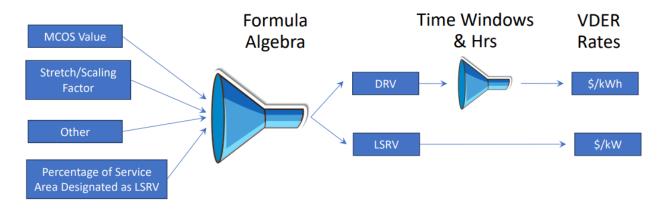


Image Credit: Energy Tariff Experts



## Community Solar Crediting Improvements

In 2024, the Public Service Commission issued a few important Orders regarding community solar crediting:

- Multiple Savings Rates by June 2025
- Net Crediting for Volumetric Community Solar by the end of 2025

In response to numerous utility billing & crediting issues, DPS Staff issued a proposal for billing & crediting performance metrics and penalties and solicited public comments. The proposal is awaiting action from the PSC.



Photo Credit: Associated Press



#### Statewide Solar for All

Statewide Solar for All (SSFA) is a utility-administered alternative to community solar. Through the program, the utility pools credits from solar and storage projects, pays the asset owner, and allocates the net savings to low-income households enrolled in utility Energy Affordability Programs.

On December 1, 2024, New York's investor-owned utilities opened SSFA enrollment.

NYSERDA set compensation levels under SSFA in this filing from November 1 2024, and indicated that projects would also be eligible for an SSFA capacity-based incentive adder through the NY-Sun program in their October 2024 SSFA webinar.

#### S-SFA: How It Works

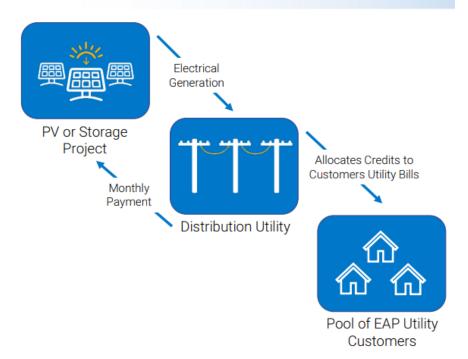


Image: NYSERDA



## Statewide Solar for All - Initial Compensation Levels

NYSERDA established the following compensation levels participating solar and energy storage projects that enroll by November 30, 2025

Utility	Central	Con	Con Edison	National	NYSEG	Orange	RG&E
	Hudson	Edison	(NYISO	Grid		&	
	Gas &	(NYISO	Zones H			Rockland	
	Electric	Zone J)	and I)				
Standalone Energy	94%	94%	94%	94%	94%	94%	94%
Storage							
Solar PV and Paired	87%	85%	86%	86%	87%	86%	87%
Solar-Storage <sup>6</sup>							
Solar PV and Paired	76%	76%	76%	76%	76%	76%	76%
Solar-Storage (50%							
Low Income							
Communities ITC)							

Source: NYSERDA



## Deployment Trends are Impressive, but a Lagging Indicator

New York is a maturing distributed solar market. 2024 was a challenging year for residential solar. 2024 was New York's best year yet in terms of community solar deployment; however, new development is down significantly.

Key threats to the sustained growth of New York's distributed solar market include:

- Rising installation costs due to macro trends of inflation and higher interest rates;
- Declining incentives as NYSERDA's NY-Sun funding is exhausted;
- Rising interconnection costs, as "low-hanging fruit is picked" and multiyear/multimillion dollar substation upgrades are increasingly being required by New York's utilities; and
- **Permitting barriers**, as municipalities adopt restrictive local laws to prevent solar as a land-use and the NY Department of Environmental Conservation (DEC) expands jurisdiction over wetlands.
- Federal uncertainty as Congress considers the future of the 30% federal solar tax credits.



New York can overcome many of these challenges with the right policy interventions. Urgent action and state-level leadership is needed.



## Governor Hochul's State-of-the-State and Budget Proposal

In January, Governor Kathy Hochul delivered her annual State of the State address, outlining her policy priorities for the upcoming year. Shortly thereafter, she presented her Executive Budget proposal.

The Governor's State-of-the-State and Budget proposal failed to include any policies supporting solar or energy storage.

NYSEIA issued a <u>public statement</u> in response, and we are redoubling our advocacy efforts with the State Legislature.

January 22, 2025

New York Solar Energy Industries Association Statement on Governor Hochul's Budget Proposal and State-of-the-State

FOR IMMEDIATE RELEASE

Media Contact: 518-288-5250, info@nyseia.org

Yesterday, Governor Hochul released a budget proposal that fails to support solar power in New York State. In her State-of-the-State address, the Governor spoke about affordability and the need for action on climate. Regrettably, she did not connect the dots between the two issues, nor did she back her rhetoric with proposals to advance cost-effective solar deployment and energy affordability. This missed opportunity won't just drive up energy costs for homes and businesses, it also threatens hundreds of solar companies and 15,490 good jobs for skilled workers in the solar industry. New York Solar Energy Industries Association (NYSEIA) is deeply disappointed in the weak positions Governor Hochul put forward on solar and energy storage in her 2025 policy agenda. State-level leadership has never been more important. We urge the New York State Senate and Assembly to fill the leadership vacuum and advance policies that support the solar industry while lowering electricity bills for all New Yorkers.







## Industry Wide Policy Priorities

# Raise New York's distributed solar goal to 20 Gigawatts by 2035

In June 2024, NYSEIA released a policy roadmap to guide the next phase of New York's clean energy transition. Enacting many of the high-impact policy initiatives in the roadmap will result in tremendous benefits for New Yorkers. <a href="www.nysolarroadmap.org">www.nysolarroadmap.org</a>

- \$50 billion in direct electric bill savings for residents, plus an additional \$28 billion in indirect savings through wholesale market impacts.
- \$3-4 billion in revenue for rural landowners, municipalities, and school districts.
- Reduction of 145 metric tons of greenhouse gas emissions and co-pollutants, leading to improved public health outcomes.
- Creation of 15,000 jobs across New York State, effectively doubling the industry's employment footprint.
- Improved land use through community-scale projects and beneficial siting practices.





## Industry Wide Policy Priorities

#### Protect the 30% Federal tax credit for solar on homes and businesses

- Efforts are underway in Congress to repeal elements of the Inflation Reduction Act.
- Preservation of the clean energy tax credits is critical to the success of the solar industry.

NYSEIA is partnering with National SEIA to bolster support for solar tax incentives among Republican members of Congress, aiming to safeguard these incentives from repeal efforts. Given the Republicans' slim majority, securing opposition from just a few members will be crucial for our success.





## NYSEIA 2025 C&I Policy Priorities

## **Community Solar Siting Reform**

#### Challenge

- Restrictive local laws and moratoria are obstructing 4.6 gigawatts of otherwise viable community solar development.
- Changes to the Freshwater Wetlands Act dramatically expand the DEC's jurisdiction over wetlands, further constraining solar development.

#### Solution

 Enact legislation establishing reasonable statewide standards for local solar zoning and permitting laws.

 Work with Department of Environmental Conservation (DEC) to develop a viable General Permit for solar energy on and adjacent to certain classes of freshwater wetlands.



## NYSEIA 2025 C&I Policy Priorities

#### Interconnection Reform

#### Challenge

- Rising interconnection costs, coupled with a lack of transparency and cost certainty, are heightening risks.
- Long lead-time distribution upgrades make it challenging for projects to secure financing and prolongs the development timeline.

#### Solution

- Interconnection reforms to improve transparency, cost-certainty and affordability
- Enable flexible interconnection
- Create cost-effective hosting capacity by unlock N-1 transformer capacity (National Grid) and sub-transmission lines (NYSEG)
- Enable self-construction
- Create additional hosting capacity through proactive distribution system investments



## NYSEIA 2025 C&I Policy Priorities

**Improve Compensation and Sustain Incentives**: Enhance Value of Distributed Energy Resources (VDER) compensation and sustain NY-Sun funding for rooftop & community solar.

**Support Continuous Improvement to Community Solar**: Support the success of Statewide Solar for All while advocating for improvements to opt-in community solar and remote crediting.

**Energy Storage Incentives**: Encourage NYSERDA to implement a robust retail/commercial energy storage incentive program across New York State, including on Long Island.

**Protect Competitive Markets**: Advocate for NYPA to use its expanded authority to build and own renewables in a manner that is additive and does not disrupt New York's competitive market for distributed energy resources. Strongly oppose any efforts by investor-owned utilities to build and own generation, especially distributed energy resources.

**Proactive Investment in the Distribution System**: Encourage New York utilities and the Department of Public Service to approve proactive investments that expand hosting capacity.

#### Modernize the NY Residential Solar Equipment Tax Credit

#### Challenge

- The solar tax credit is inaccessible to low-income families and seniors.
- The incentive has not been updated or adjusted for inflation in ~20 years.
- Energy storage expenses are excluded.
- The current statute places an arbitrary cap on the incentive for housing cooperatives and condominiums.

#### Solution

- Make the tax credit refundable for lowincome families and residents of disadvantaged communities.
- Raise the per household cap to \$10,000.
- Clarify that energy storage expenses are part of the eligible basis.
- Remove the cap on housing cooperatives and condominiums.



### **Enable Residential Energy Storage in New York City**

#### Challenge

- The current fire code requirements are infeasible and effectively impose a ban on residential batteries in New York City.
- Despite years of advocacy, the FDNY
  has remained resistant to amending its
  requirements, preventing NYC residents
  from accessing resilient power.

#### Solution

 Enact legislation in the New York City Council that will: 1) waive NYC's bespoke and infeasible requirements for small, UL9540 listed batteries; and 2) direct the FDNY and the Department of Buildings to develop guidelines to facilitate streamlined permitting for medium-sized energy storage systems.



#### **Consumer Protection**

#### Challenge

 Sales and marketing practices that don't comply with New York's Uniform Business Practices can result in negative experiences and consumer dissatisfaction.

#### Solution

- Promote industry best practices and advocate for enforcement of existing consumer protection regulations.
- In 2024, NYSEIA adopted a Member Code of Conduct to promote high standards of conduct.



## **Lower Soft Costs via Automated Permitting**

#### Challenge

 Permitting timelines and costs vary significantly across New York State, with some jurisdictions taking several weeks or even months to process permits.
 These permitting challenges are a major factor contributing to customer dissatisfaction and cancellations in the solar industry.

#### Solution

 Enact legislation to promote the adoption of automated residential solar permitting platforms.



- **Sustain Funding:** Advocate for continued NY-Sun funding for the residential market, including both mass market and low- to moderate-income homeowners.
- Energy Storage Incentives: Advocate for NYSERDA to implement a robust statewide energy storage incentive program.
- Smart Rate Design Evolution: Advocate for new and enhanced Virtual Power Plant (VPP) programs that adequately compensate dispatchable residential energy storage systems for grid services while protecting net energy metering and the economic value proposition of behind-themeter solar.
- Improve the GJGNY Loan Program: Support legislation to raise the cap on the loan amount.
- Enable Low-Cost Interconnection through Meter Socket Adaptors: Support ConnectDER and Tesla's petition to enable the statewide use of MSAs to lower residential interconnection costs.



## ADVANCING SOLAR ENERGY FOR NEW YORK

NYSEIA

New York Solar Energy Industries Association (NYSEIA) advances policies and programs that accelerate distributed solar and energy storage deployment across New York. Join our trade association to access valuable market intelligence, to have a voice in Albany, and to help build power for the rooftop and community solar industry.

Join NYSEIA today to access member benefits and to strengthen New York's solar industry

https://www.nyseia.org info@nyseia.org

Thank you!