



**STATE OF NEW YORK  
PUBLIC SERVICE COMMISSION**

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**Motion of the Commission to Implement  
Transmission Planning Pursuant to the  
Accelerated Renewable Energy Growth  
and Community Benefit Act**

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**Case 20-E-0197**

**Comments of New York Solar Energy Industries Association Regarding  
Research and Development Plan for Advanced Transmission and Distribution  
Technologies**

**Dated: September 7, 2022**

**New York Solar Energy Industries Association Comments to New York State Public  
Service Commission Regarding Joint Utilities’ *Research and Development Plan for  
Advanced Transmission and Distribution Technologies*  
Case 20-E-0197**

**Introduction**

New York Solar Energy Industries Association (NYSEIA) submits these comments in response to the New York State Public Service Commission (“Commission”) August 9, 2022 Notice Soliciting Comments in the above-referenced proceeding regarding the *Research and Development Plan for Advanced Transmission and Distribution Technologies* (“Plan”).

Our comments address aspects of the Joint Utilities (JU) Plan that warrant particular attention or clarification, including:

- Implementing near-term solutions; and
- Stakeholder involvement and transparency.

**NYSEIA Comments and Recommendations**

**I. Recommendation: Advanced Technologies Working Group (ATWG) should consider and address deployment of near-term distribution grid solutions**

As concluded by the Commission in its January 20, 2022 *Order on Power Grid Study Recommendations*, both near and long-term efforts are necessary to take advantage of the benefits that technology may offer to ratepayers. The Commission further states that many of the technologies being considered by the ATWG have already been tested and/or implemented by utilities, and that the deployment of such advanced technologies “must continue to take fullest practical advantage of new technology and other innovation.”<sup>1,2</sup> However, while the stated goal of the ATWG is to “identify, discuss, and resolve technical barriers and challenges associated with developing and deploying advanced technologies on the New York electric T&D systems”<sup>3</sup> (including distribution systems), the research and development process proposed by the JU Plan is seemingly limited to activities that support longer-term operation and integration of renewable energy into the transmission system.

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<sup>1</sup> NYS Public Service Commission. [Order on Power Grid Study](#). January, 20, 2022.

<sup>2</sup> NYS Public Service Commission. [Order on Transmission Planning](#). May 14, 2020.

<sup>3</sup> Joint Utilities of NY. [Research and Development Plan for Advanced Transmission and Distribution Technologies](#). July 20, 2022.

NYSEIA respectfully recommends that the ATWG include a focus on the implementation of tested and cost-effective *near-term* solutions, especially in relation to distribution grid systems. This should include technologies that may serve as a “stopgap measure” until cost-effective grid upgrades can be identified, designed, and built. There is an immediate opportunity to accelerate the deployment of technologies that can offer significant near-term benefits by increasing renewable generation integration headroom of existing grid facilities (i.e. Flexible Interconnection, or FICS, or Active Resource Integration, or Dynamic Curtailment solutions), as highlighted in previous comments submitted by NYSEIA in Case 20-E-0197.<sup>4</sup> The near-term application of these established advanced technologies can serve to increase headroom and facilitate distributed energy resource development in the short term, while also supporting and even de-risking longer-term efforts for robust and coordinated transmission and distribution grid planning by providing real world market indicators for potential future grid upgrades.

## **II. Recommendation: ATWG should expand stakeholder engagement opportunities and provide transparency in working group activities and proposed resolutions**

In the *Order on Power Grid Study Recommendations* the Commission highlighted that the Interconnection Technical Working Group (ITWG) and the Interconnection Policy Working Group (IPWG) have functioned successfully over the last several years in the context of interconnection and recognized that “these groups are largely stakeholder driven but are guided by subject matter experts from DPS & NYSERDA.”<sup>5</sup> However, NYSEIA suggests the proposed ATWG governance does not follow the principles of a collaborative working group structure such as the ITWG or IPWG, since the proposal lacks active and open stakeholder engagement from parties other than the JU or State agencies, thus minimizing outside validations and inputs.

NYSEIA therefore recommends that the ATWG follow similar operating principles as these existing groups, and at a minimum, have at least one renewable energy industry representative allowed to participate in meetings. NYSEIA has been a long-standing active participant in both the ITWG and IPWG and can confidently assert from shared experience that effective co-chairs and appropriate governance is paramount to productive discussions and ultimate working group success, but we also suggest that solutions and resolutions are discovered, initiated, discussed and implemented largely by the active and engaged market participants and stakeholders including the solar and storage industries along with the New York Joint Utilities and State representatives. At a minimum, the governance document should be enhanced to allow for more open public discussions and established opportunities for stakeholders to provide responsive feedback for the active parties to take into consideration. The Commission should also consider

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<sup>4</sup> NYSEIA. [Comments of New York Solar Energy Industries Association Regarding Motion of the Commission to Implement Transmission Planning Pursuant to the Accelerated Renewable Energy Growth and Community Benefit Act](#). January 18, 2020.

<sup>5</sup> NYS Public Service Commission. [Order on Power Grid Study](#). January 20, 2022

the role of a designated independent facilitator or “ombudsperson” within the ATWG; the activities of this group may gain significant market interest and some level of expert facilitation may be required to solicit external input while exploring concepts that are “deemed of interest and value.”<sup>2</sup> Furthermore, additional opportunities for stakeholder engagement could be facilitated through the posting of meeting recordings or meeting minutes. Finally, stakeholder input could be solicited on the ATWG guidance document as well as the ATWG progress report due January 20, 2023, including opportunities for public comment on the progress and developing scope of the ATWG including proposed advanced technology use-cases.

Furthermore, NYSEIA suggests that the ITWG and IPWG can provide an immediate forum for discussion and knowledge transfer in working towards nearer term applications of well-established technologies and existing pilot programs, such as National Grid’s “Active Resource Integration” pilot at Peterboro substation, and Avangrid’s “Flexible Interconnect Capacity Solution” in Champlain & Spencerport. NYSEIA notes that ITWG and IPWG have successfully facilitated knowledge transfer and public discussions on existing advanced technology pilot project solutions in National Grid, Avangrid, and Central Hudson territory and attempted to identify market interest<sup>6</sup> and policies and procedure requirements<sup>7</sup> to facilitate advanced technology solutions such as “Flexible Interconnection.”<sup>8</sup> Implementing these solutions would serve to immediately increase headroom without the extended timeline for planning studies and sunk cost risks associated with capital investment.<sup>9</sup>

## **Conclusion**

NYSEIA recommends the Commission seek a holistic ATWG research and development plan with outcomes and recommendations to be in line with complete solutions – including both near and long-term solutions for both transmission and distribution grids – that can be transferred and implemented by market participants. We urge the Commission to solicit immediately actionable plans from ATWG for near-term widespread deployment of established advanced technologies. The Commission has stated expectations that the deployment of beneficial technologies that have documented operational history be more direct than in the case of less-developed technologies. NYSEIA supports the Commission’s recommendations and thus requests ATWG to follow through with more direct and immediate pathways to deployment of advanced technologies rather than solely as an input to the longer-term Coordinated Grid Planning Process.

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<sup>6</sup> ITWG. [Flexible Interconnection Topical Review, Roadmap and Research](#). May 19, 2022.

<sup>7</sup> ITWG. [Questions to Joint Utilities & Industry Response](#). July 21, 2022.

<sup>8</sup> Smarter Grid Solutions. [Flexible Interconnection: Clearing queues, reducing costs and speeding up grid connections whitepaper](#). July 2022.

<sup>9</sup> NYSEIA supports an expanded distribution planning process that modernizes DER forecasting and aligns with CLCPA goals as vital and necessary; while the implementation of flexible interconnection and other established grid modernization technologies are viable and necessary in the near-term, with the additional benefit of helping to identify the most cost-effective long-term solutions and grid upgrades.