



Re: Case 20-E-0197 - Comments of New York Solar Energy Industries Association Regarding Staff Straw Proposal for Conducting Headroom Assessments

June 22, 2021

The New York Solar Energy Industries Association (“NYSEIA”) submits the below comments on the New York State Department of Public Service (“DPS”) Staff Straw Proposal for Conducting Headroom Assessments (“Straw Proposal”) filed in Case 20-E-0197 and discussed at the DPS technical conference held on May 13, 2021.

- NYSEIA recommends headroom calculations be **updated annually**, with some flexibility to account for scenarios where a particular utility has not witnessed significant changes from the previous year’s assessment. Doing so would provide stakeholders with an up-to-date view of transmission and distribution headroom, which is critical given the ongoing regulatory process for determining the future of market support mechanisms for commercial distributed solar and a possible new state target for distributed solar deployments. It is imperative that the T&D planning process should account for the headroom and upgrades needed to achieve any new distributed solar targets set by the state.
- NYSEIA wishes to emphasize the straw proposal's approach to **model the distribution electrical system beyond the substation transformer** to capture the effects of load, REG and storage variations, circuit characteristics and protection, which we believe are critical for enabling needed distribution upgrades.
- NYSEIA recommends expanding the recommendation for **recognizing Grid Enhancement Technologies (GET) to also include grid modernization technologies for the distribution system** (e.g., dynamic curtailment). We are concerned that GET as currently used is a term that may be limited to technology that solely improves transmission, and strongly advocate that the distribution analogue should also be included in the scope of GET.
- NYSEIA strongly recommends that **opportunities to implement distribution technologies should be identified and integrated into headroom assessments**. Several

distribution technologies, including the “Flexible Interconnection Capacity Solution” (a.k.a. dynamic curtailment) proposed by Avangrid were identified as Phase II solutions as an alternative to infrastructure upgrades. Infrastructure should be modeled comprehensively to meet the generation and load needs of the system, and include opportunities for low-cost and implementable solutions that can be deployed on an interim or permanent basis to resolve a hosting capacity challenge. The layering of implementable distribution technologies to an infrastructure upgrade can provide greater incremental headroom.

Dated: June 22, 2021

By: Shyam Mehta, Executive Director
New York Solar Energy Industries Association (NYSEIA)