



July 1, 2022

**NYSEIA Comments on the New York State Climate Action Council Draft Scoping Plan**

New York Solar Energy Industries Association (NYSEIA) strongly supports the Climate Action Council's Draft Scoping Plan. This course of action will reduce home health risks and strengthen economic resilience in our communities. The planned investments will also provide new opportunities for high-quality jobs across NY, further stimulating local economies. The solar industry also appreciates the focus on equity and environmental justice, and the proposed principles for a just transition and prioritization of workforce development.

In regard to the zero-emission power sector by 2040 goal, distributed solar and storage projects (DERs) present a unique opportunity to save money on our pathway to an advanced energy economy. Localized generation and storage adds efficiencies and reduces costs by curtailing grid investments. We urge the State to utilize DERs to the fullest extent possible to avoid costs and maximize benefits for all New Yorkers.

NYSEIA respectfully emphasizes support for the following Plan recommendations:

- Improve compensation methodologies to more accurately reflect the value provided by DERs such as environmental value and avoided transmission costs, and improve dynamic underlying electric rate structures and programs to provide appropriate cost-based price signals to customers.
- Speed up the pace of processing interconnection applications to mitigate costly delays. We note this may require more stringent oversight and addressing the need for right-sizing human resources at the utilities, applicable not only to interconnection processing, but also grid planning and DER program implementation.
- Encourage a streamlined permitting process across authorities having jurisdiction that reduces processing times and soft costs, along with providing model zoning laws to municipalities for residential/commercial properties regarding new construction.

Thank you and we look forward to continuing our role in one of NY's largest and fastest growing job sectors.

Respectfully,

Zack Dufresne, NYSEIA Executive Director