

**STATE OF NEW YORK
PUBLIC SERVICE COMMISSION**

Proceeding on Motion of the Commission to)
Address Interconnection Reforms for Large Loads.) **Case 26-E-0045**

I. Introduction

New York Solar Energy Industries Association (NYSEIA) is New York’s distributed solar + storage trade association. Founded in 1994, NYSEIA represents hundreds of businesses employing thousands of New Yorkers and works to scale clean energy solutions that lower bills, strengthen communities, and improve reliability. Our policy work focuses on making distributed solar and storage affordable and accessible statewide.

On February 12, 2026, the New York State Public Service Commission (Commission) issued an Order Instituting a Proceeding and Soliciting Comments regarding the interconnection of large electric loads in New York. The proceeding was initiated in response to a recent increase in proposed large load projects, including data centers, and other energy-intensive developments that may require substantial transmission, distribution system upgrades and increased energy supply.

The Order recognizes that large load interconnections present unique operational, planning, and cost allocation challenges that differ significantly from traditional customer load growth. Specifically, the Commission identified concerns relating to utility planning certainty, interconnection timeline certainty, upgrade cost predictability, and the potential for significant cost impacts to existing ratepayers if major infrastructure investments are undertaken to accommodate speculative or uncertain load projects.

The Commission also recognizes the unprecedented scale and concentration of proposed large load additions currently being proposed across the state, and emphasizes the need to modernize New York’s existing interconnection and utility planning frameworks. Unlike traditional incremental customer growth, large load projects can require significant expansion to distribution substations, transmission facilities, and bulk electric system infrastructure over relatively short timeframes. This transmission and distribution system expansion may involve substantial capital investment and long development timelines, particularly where upstream transmission investments become necessary. The Order further acknowledges that utilities face increasing difficulty planning and sizing infrastructure investments when proposed large load projects may have uncertain development schedules, evolving energy requirements, or a material risk of cancellation after utility infrastructure investments have already been initiated. At the same time, the Commission acknowledges that large load developers require greater certainty regarding interconnection timelines, study assumptions, upgrade requirements, and project costs in order to support financing, site selection, and commercial development decisions.

Accordingly, the proceeding seeks to evaluate potential reforms to improve transparency, predictability, and fairness within the large load interconnection process. Areas identified for consideration include project readiness requirements, queue management practices, study procedures and timelines, treatment of speculative projects, upgrade cost allocation methodologies, financial security requirements, and

mechanisms to ensure that supply and infrastructure costs are assigned appropriately between interconnecting large load customers and existing utility ratepayers.

The proceeding identifies several emerging concerns associated with the current framework for large load interconnections and emphasizes the importance of balancing economic development and electrification objectives with the obligation to maintain safe, reliable, and affordable electric service for existing customers.

New York has already confronted many of these same challenges discussed in the Commission Order with regard to distributed energy resource (DER) interconnection over the past decade. NYSEIA appreciates the opportunity to provide comments on this proceeding, and we hope that lessons learned from DER interconnection over the last decade can be leveraged to enable rapid and equitable addition of beneficial large loads in New York while protecting existing ratepayers and ensuring continued progress toward New York's clean energy policy objectives.

II. Comments of New York Solar Energy Industries Association

NYSEIA offers the following high level recommendations for consideration by the Commission in this proceeding. We also offer detailed recommendations and analysis that reference the New York Standardized Interconnection Requirements (NY-SIR) as a valuable framework that could be leveraged to develop an equitable approach to interconnect large loads in New York in a manner that does not impose undue financial risk or burdens on ratepayers.

a. New large loads should not impose additional costs on existing ratepayers, and should not undermine progress toward clean energy goals.

The Commission correctly recognizes that large load interconnections may impose costs on existing customers through: 1) Increases to supply costs; and 2) Increases to capacity needs on the distribution substation or upstream transmission system. The current framework also creates a risk that ratepayers could fund grid upgrades to accommodate large loads that ultimately do not materialize, resulting in underutilized infrastructure and potential stranded costs borne by ratepayers. In addition to addressing these cost concerns, the Commission also states that its goal is to connect new large loads in a manner that is consistent with the Climate Leadership and Community Protection Act (Climate Act).

NYSEIA agrees with the Commission that the cost impacts of new large loads should be quantified and allocated to the beneficiaries, i.e., to the large load customers. New York already has well-established rules for cost allocation for generators and DERs, with interconnection costs borne by the interconnection customer; these existing frameworks could be leveraged to ensure that new large loads pay for transmission and distribution system expansion that is attributable to them in a manner that minimizes cost impacts for ratepayers. New York does not have a clearly defined framework or methodology for assessing energy supply cost impacts caused by large loads, however, we know such potential costs are significant. When energy demand increases significantly, this places strain on New York's energy supply and results in higher-cost resources providing capacity and energy in a manner that can increase costs systemwide for all customer classes.

In addition to potential energy supply cost increases caused by new large loads, these large loads have the potential to increase air pollution and counteract progress toward the Climate Act. In July 2024, the New

York State Department of Public Service (DPS) and NYSERDA filed a Draft Clean Energy Standard Biennial Review which highlights the fact that projected increases to electricity consumption, driven by data centers and electrification, are increasing the gap between New York's projected renewable electricity supply and the 70% by 2030 and 100% by 2040 levels required under the Climate Act.¹

One way to address these energy supply challenges would be to require new large loads to bring their own energy supply, and to ensure that it is clean. Another approach is to ensure that new large loads are making significant financial contributions toward statewide clean energy programs that would enable NYSERDA to procure new clean energy resources, including Tier 1 RECs and DERs, to meet the incremental energy needs without eroding progress toward New York's policy goals and without driving up supply charges for other customers. NYSEIA does not offer a specific recommendation in these initial comments, but we urge the Commission to consider and advance strategies that pair new large loads with clean energy resources that are additional to those already being developed through existing programs and procurements.

b. A separate rate class/ customer classification may be necessary to segregate and allocate costs, and to ensure that new large loads pay for clean resources to help meet load growth they cause.

The Commission Order instituting this proceeding does not define large loads. We believe it is critical for the Commission to clarify what constitutes large loads and to solicit additional stakeholder feedback to ensure that the scope is appropriately defined. NYSEIA believes that the Commission's intent with this proceeding is to ensure that certain new large loads, such as data centers, do not impose costs on other ratepayers while providing limited societal benefits and impeding progress toward clean energy policy goals. Surely, there are other large loads that do not fall into this category, such as multifamily buildings and industrial facilities that are job intensive and provide significant value to a local community. Once large loads are clearly defined, the Commission should consider strategies to segregate and allocate costs to these large loads.

Addressing the upfront costs of system expansion to serve these loads is relatively straightforward and can rely upon the NY-SIR at the distribution level, or a similar framework for transmission-level interconnection. However, fair cost allocation for energy supply impacts will require creativity, and implementing fair ongoing cost allocation may be easier with the creation of a dedicated service class. For example, if the Commission determines that new large loads should contribute more toward NYSERDA Clean Energy Fund programs or Tier 1 REC procurements, it could implement a differential System Benefits Charge (SBC) for this customer class to ensure that they are supporting the addition of new clean energy resources that is proportionate to their impact on energy supply.

c. Flexible loads should receive favorable treatment in tariff, as they contribute less to system peaks and enable increased system utilization.

Not all loads are created equal. Loads that are peaky and inflexible are the most expensive to serve, whereas base loads that are flexible (i.e., they can be shed during times of peak demand) are less expensive to serve. NYSEIA urges the Commission to consider the flexibility of new loads as it develops

¹ Case 15-E-0302. NY DPS and NYSERDA. Draft Clean Energy Standard Biennial Review. July 2024.

its cost allocation framework for both large load interconnection and supply impact cost allocation. Certain loads are genuinely flexible, and certain inflexible loads can be made flexible with onsite generation and battery energy storage systems (BESS). Flexibility should be strongly encouraged for new large loads, as it will reduce these large loads' contributions to the system peak, reduce the need for costly system expansion and increase overall system utilization.

Flexible large loads, such as data centers with onsite BESS or generation, should be afforded faster and lower cost interconnections than inflexible loads, as they do not require the same level of system expansion as inflexible loads. The same logic should apply to generators, such as solar PV that will accept some curtailment through a flexible interconnection framework, and to bi-directional loads such as retail BESSs. BESS are highly flexible loads that can be actively managed to mitigate peak demand and to avoid constraints during contingency events. Through the Commission's Grid of the Future proceeding, the Department completed a Grid Flexibility Study which quantified some of the benefits of flexibility at a high-level. These potential benefits can be unlocked through smart rate design, enhanced demand response programs, and interconnection reforms that reward flexibility with lower distribution upgrade costs and faster timelines. NYSEIA urges the Commission to consider strategies to unlock the benefits of flexibility for large loads and DERs quickly and in tandem.

- d. New York's SIR effectively governs DER interconnection. This is an important existing framework for interconnection cost allocation and can be leveraged to inform New York's strategy to interconnect new large loads while protecting ratepayers.**

As the industry liaison to DPS' Interconnection Policy Working Group (IPWG) and a representative of DER developers, NYSEIA is intimately familiar with the NY-SIR. The NY-SIR governs the process to interconnect DERs with New York utilities' distribution systems. The NY-SIR is foundational to New York's most successful energy sector in the last decade, and many elements of the NY-SIR are directly relevant to this proceeding, including queue management rules and equitable cost allocation. NYSEIA recommends that the Commission leverage this proven framework to support large load interconnection. NYSEIA offers a more detailed analysis of how the NY-SIR could be applicable in a later section of these comments.

- e. Rapid DER deployment can help meet rising demand for electricity, counteracting load growth driven by large loads and electrification in order to deliver utility bill savings and clean energy for ratepayers.**

New York's electric system is entering a period of sustained load growth driven by electrification, economic development, and a rapid increase in proposed large-load projects such as data centers. While this growth creates real planning and infrastructure challenges, it also raises a central policy question for the Commission: how to meet rising demand without increasing costs for existing ratepayers. The answer to that question will determine whether large load growth places upward pressure on rates or reduces system costs.

Distributed solar and energy storage provide one of the most practical and immediate solutions to this challenge. Unlike large centralized generation and transmission investments, which require long development timelines and substantial capital commitments, DERs can be deployed quickly,

incrementally, and in close proximity to load. These characteristics allow DERs to be deployed on timelines that align with actual load growth while limiting the need for costly infrastructure expansion.

When deployed at scale, distributed solar paired with energy storage reduces net load during the most expensive and constrained hours, easing stress on both the bulk system and local distribution infrastructure. By reducing net load at the point of consumption, these resources directly reduce the incremental demand imposed on the grid by new customers. A significant share of reliability and cost challenges arise during peak system conditions, when constrained transmission, localized congestion, and high marginal costs coincide. Distributed solar and storage operate precisely at those pressure points. At the same time, they reduce peak demand, which is the primary driver of capacity costs, congestion, and grid upgrades. They can also defer or avoid the need for traditional transmission and distribution system expansion, reducing system costs borne by ratepayers. They further reduce reliance on high-cost marginal resources, including fossil fuel-based generation that increases exposure to price volatility in customer bills.

These dynamics are directly tied to ratepayer affordability. Without a meaningful increase in load-reducing and flexible resources, large load growth will trigger substantial system upgrades and higher ongoing operating costs that place upward pressure on rates for existing customers. Distributed solar and storage provide a pathway to absorb a portion of that growth while helping to limit or avoid those costs. In doing so, they function not only as clean energy resources, but also as cost-containment tools that directly support the Commission's obligation to ensure safe and adequate service.

These benefits are not theoretical or long-term. Distributed solar and energy storage are available and deployable today, and can move from development to operation on significantly shorter timelines than bulk system alternatives. These are among the only resources capable of addressing load growth within the same time frame in which that growth is occurring. This temporal advantage is particularly important given the scale and speed of large-load interconnection requests currently facing the system.

Energy storage further enhances these benefits by enabling solar generation to be shifted to peak hours, when demand is highest and wholesale prices peak. This capability allows distributed resources to directly address the conditions that drive both reliability challenges and high system costs, reducing peak system costs and reliance on expensive peaking resources.

Ultimately, whether large load growth leads to increased or decreased costs for New Yorkers will depend on the extent to which the State enables and accelerates the deployment of distributed resources that can offset that growth. Absent this deployment, large load growth will result in greater reliance on traditional infrastructure expansion and marginal generation, increasing costs and exposing ratepayers to greater price volatility. With it, New York can meet rising demand while maintaining or reducing peak system costs, improving system cost efficiency, and delivering cleaner, more affordable energy.

For these reasons, the Commission should treat the acceleration of distributed solar and energy storage deployment not as a parallel policy objective, but as a core component of its strategy for integrating large loads and managing load growth.

III. The Commission can leverage the NY-SIR to develop an equitable framework for large load interconnection

NYSEIA offers the following analysis of the NY-SIR and details some ways it could be applicable for large load interconnection.

a. Interconnection Costs Can be Allocated to Large Loads

Under the NY-SIR, DER interconnection customers are responsible for paying for distribution upgrades that are needed to safely interconnect the solar or BESS project to the distribution system. In general, this is a fair cost allocation approach that protects ratepayers from costs caused by the interconnection customer. NYSEIA encourages the Commission to consider adopting a similar strategy for large loads, whereby these new load customers pay for the cost of any system expansion needed to serve their facility. While the NY-SIR is a strong framework, there are nuanced improvements to the framework that NYSEIA recommends the Commission consider for DERs and for large loads pertaining to cost transparency and cost-certainty, discussed later in this section.

b. Need for a Statewide Standardized Interconnection Process for Large Loads

The NY-SIR has been highly successful, resulting in approximately one gigawatt of DER capacity addition in each of the last two years, with the majority of this capacity coming from large DERs (1-5 MWac), including community solar and retail BESS. The NY-SIR includes the following:

1. Standardized application requirements and study procedures
2. Cost allocation framework
3. Financial security requirements
4. Milestone requirements for utilities and customers
5. Differentiated treatment of various customer classes
6. Queue transparency
7. Timeline certainty
8. Standardized cost estimate methodologies
9. A transparent dispute resolution process

The NY-SIR framework has demonstrated that a collaborative stakeholder process with standardized statewide rules can improve transparency, accountability and efficiency of the interconnection process. While large loads present unique planning and infrastructure challenges, many of the underlying procedural challenges are similar to those already addressed in the DER interconnection process. The following sections explain how the concerns identified in the order are procedurally addressed in the SIR and provide additional considerations for a statewide interconnection process for large loads.

c. Addressing Speculative Load and Establishing Maturity Requirements

The Commission correctly identifies speculative and duplicative load requests as a significant emerging concern. Without meaningful readiness and maturity requirements, speculative projects can occupy limited system capacity, distort planning assumptions, delay other viable customers, and trigger unnecessary infrastructure upgrades.

The NY-SIR addresses this issue by requiring DER interconnection applicants to provide deposits or financial security for the estimated cost of the distribution upgrade needed to accommodate the proposed project. Under the NY-SIR, an interconnection applicant pays the utility to conduct a Coordinated Electric System Impact Review (CESIR); a timebound process whereby the utility identifies any necessary distribution upgrades and provides a cost estimate to the interconnection applicant. If the DER developer wishes to advance its proposed project, it must make a deposit for the estimated interconnection cost. The deposit is collected in two milestone stages, where the project first pays 25% of the security and 75% of remaining security in the second stage on prescriptive timelines. Failure to issue timely payment of the deposit results in removal from the interconnection queue, ensuring that speculative projects do not occupy available hosting capacity, and incentivizing DER developers to advance their projects to completion.

The NY-SIR also includes provisions which require the applicant to demonstrate project maturity to submit an application and again at periodic intervals in the development process. NYSEIA and the Joint Utilities have expressed interest in strengthening these requirements to reduce the likelihood of nonviable projects occupying hosting capacity and contributing to queue congestion that drives up costs and extends timelines for subsequent projects. Similar maturity requirements and maturity milestones could be implemented for large loads to avoid speculative applications and to provide utilities with a clearer sense of which projects are likely to move forward and ultimately be completed. It is important to consider whether different maturity requirements may be needed for varying customer classifications, and NYSEIA recommends that this be discussed with large load customers directly to ensure that sector-specific nuances are considered and incorporated into any policy governing large load interconnection

d. Improving Timeline Certainty and Cost Predictability

Similar to DER developers, large load customers likely require predictable costs and timelines for interconnection. The NY-SIR provides some timeline certainty to applicants by enforcing timebound utility review periods and system impact study periods. This framework creates timeline certainty for applicants, especially in the early stages where the scope and estimated cost of the distribution upgrades are unknown. Additionally, deadlines for DER developers to post deposits also help ensure that applicants with more speculative projects do not remain in the queue for extended periods of time; a practice that can further increase interconnection cost and harm the viability of subsequent queued applicants.

As the Commission seeks to protect existing ratepayers from the cost to interconnect and serve large load customers, NYSEIA encourages the Commission to think critically about how to do this in a manner that is economically feasible for the large load customer. In general, DER developers and large load customers should pay for distribution upgrades needed to enable their projects to interconnect. However, it is also important that the costs of these upgrades be transparent and predictable. Under the current NY-SIR framework, DER developers receive non-binding cost estimates for distribution upgrades from the local electric utility, and DER developers are ultimately responsible for any and all utility cost overruns associated with the required upgrades. In recent years, utility cost overruns have become more common, highlighting a significant misallocation of risk; DER developers bear 100% of the risk of utility cost overruns but have no means to control the utility's costs to perform the upgrades. This challenge has

negatively impacted DER development in recent years, and resulted in reduced clean energy infrastructure investment in New York.

In February 2025, NYSEIA filed a petition with the Commission titled Cost Certainty and Transparency for Distribution Upgrades² that seeks to address these issues by requesting that the Commission increase transparency and standardization for utility cost estimation practices and create an outer limit to the DER interconnection customer's liability for utility cost overruns. The Commission has not yet ruled on this petition. As the Commission considers cost allocation approaches for large loads, NYSEIA encourages the Commission to consider its experience with DERs and to proactively address issues of cost-certainty.

e. Modernizing Cost Allocation Framework

The Commission correctly emphasizes the importance of protecting existing ratepayers while ensuring that new large loads bear appropriate share of system costs. However, a beneficiary pays framework may not always produce efficient or equitable outcomes for large infrastructure upgrades that provide broader system value. Even in cases where broader system value is limited, the requirement to have a beneficiary make an upfront payment for 100% of the upgrade costs can make the beneficiary project nonviable and limit New York's ability to modernize the grid when a collective group of projects can fund grid upgrade.

The SIR recognized that requiring the triggering project, the first beneficiary, to fund 100% of the upgrade costs can result in project cancellations. To mitigate this, DPS Staff, Joint Utilities and DER developers jointly developed a Cost Sharing 2.0 framework that allows triggering and subsequent projects to fund a pro-rata share of upgrade costs that benefit both projects, e.g., substation upgrades. NYSEIA is not certain if a similar framework would be beneficial for large loads, however, we encourage the Commission to engage with large load developers to identify creative strategies to share costs among large loads, which could enable larger upgrades to move forward.

f. Queue Management and Transparency

NYSEIA recommends that the Commission require New York Utilities to enable greater transparency into large load interconnection queues, as this serves as a fundamental resource for regulators and customers to identify congested areas, identify cost sharing opportunities, and enforce trust in utility processes.

We recommend replicating the SIR Inventory information for large loads queue, under which the utility is required to report monthly updates to queued projects i.e their status in the queue, located feeder/substation, cost responsibility, whether interconnection payment was made and whether the project is under construction or complete.

IV. Conclusion

The Commission's decision to initiate this proceeding is timely and necessary. NYSEIA appreciates the opportunity to provide comment on this proceeding and looks forward to working with the Commission, DPS Staff and other stakeholders to leverage proven interconnection practices to modernize statewide interconnection processes for large loads, and to make continuous improvements to the NY-SIR.

² 24-E-0621. NYSEIA. Petition - Cost Certainty and Transparency for Distribution Upgrades. February 2025.

Questions soliciting stakeholder comments on integrating large electric loads.

1. How can large load demand be accurately forecasted and verified before being included in long-term load forecasts and system planning studies?

A statewide standardized interconnection process for large loads that includes defined project maturity and readiness requirements and maintenance of a monthly queue inventory can provide increased certainty to grid planners. Similar to the NY-SIR framework, large load applicants should be required to meet specific development milestones, including financial commitments, before being considered “verified” for planning purposes.

2. What innovative technology should be considered to improve interconnection cost estimates, reduce development time, and provide sensitivity analysis?

A statewide standardized interconnection process should require utilities to provide good-faith cost estimates using standardized assumptions and methodologies. These estimates should remain binding for a defined period, such as three years, provided the project maintains its milestones and scope. To reduce development timelines, utilities should provide target in-service dates for projects that execute agreements and release their deposits in a timely manner.

a. How has this technology been utilized and what were the results?

This is a proven process to interconnect DERs. Some of these practices have been implemented in New York State (e.g., timeline certainty as outlined in the recently adopted Appendix M from the Commission’s January 2026 Queue Management Order), which cost-certainty has been implemented in other states. Massachusetts³ and Rhode Island⁴ interconnection tariffs established a 10% hard cap on utility cost overruns beyond initial estimates, while California adopted a 25% cap on DER developers’ liability for utility cost overruns through interconnection reform proceedings. NYSEIA recommends that any cost-certainty policy be directly linked to timeline obligations for developers to protect utility shareholders and ratepayers from inflationary risk, which increases over time as projects get delayed. This concept is articulated in greater detail in NYSEIA’s February 2025 Cost Certainty and Transparency for Distribution Upgrades petition.

3. What requirements should be applied to large loads and / or data centers to maintain grid reliability, protect ratepayers, and meet New York’s climate goals?

Similar to the SIR process, project beneficiaries should be responsible for upgrade costs required to accommodate the project. It is important that all beneficiaries including generation can contribute to this incremental capacity to both increase project viability and eliminate ambiguity between “cost causer” and “beneficiary pays” principles. In addition to ensuring that large loads lay for any necessary system expansion, NYSEIA recommends that the Commission evaluate economic and environmental energy supply impacts of new large loads, and ensure that these

³ Massachusetts Department of Public Utilities. ORDER ON THE MODEL INTERCONNECTION TARIFF. Attachment A. April 22, 2015.

⁴ The Narragansett Electric Company (“Rhode Island Energy”). Standards for Connecting Distributed Generation. Issued July 25, 2022.

projects pay a rate that ensures they don't increase supply charges on existing ratepayers and also to ensure that they contribute toward clean energy programs at a level adequate to ensure that they do not undermine progress toward New York's Climate Act or other public policy goals. New York has proven frameworks to equitably allocate interconnection costs, however, additional analysis and stakeholder engagement is necessary to adapt this framework for large DERs. And New York does not have a framework to quantify energy supply charge impacts of new large loads, or to offset these impacts through differentiated supply charges. Developing such a framework is likely warranted, and it will require significant research, analysis and stakeholder engagement.

4. What grid services such as load flexibility, demand response, on-site generation, energy storage, or alternative service be considered?

We encourage the Commission to prioritize renewable energy resources for on-site generation. For off-site generation we recommend the Commission consider flexible interconnection of PV, BESS and hybrid systems to expedite resource availability, reduce upgrade costs and support local grid needs. Flexible loads should be given preferential treatment, as they can be served at a lower cost and with existing infrastructure. This general concept should apply equally to new large loads and to DERs, including solar PV generators and BESS (flexible bidirectional loads) via flexible interconnection.

5. How should cost allocation be structured to ensure data centers or similar facilities bear the cost they impose on the electric system?

For transmission and distribution system investments needed to serve large loads, we recommend the Commission adopt a transparent state-wide beneficiary pays framework that is generally aligned with the existing framework for large DERs under the NY-SIR. NYSEIA does not have detailed recommendations for how the Commission should account for supply charge impacts of new large loads, however, we strongly support efforts to quantify these impacts and offset them through clean energy capacity addition and rate design that ensures large loads contribute toward the SBC and other programs that enable clean energy resources to come online quickly in order to counteract any upward pressure on wholesale rates attributable to these large loads.

6. How can the state ensure transparency in the large load interconnection process and information sharing?

We encourage the Commission to implement monthly queue reporting of large loads that are subject to beneficiary pays principle. The NY-SIR Inventory reporting provides transparency into the status of projects, location on the electric system and their cost responsibility. A similar reporting process can likely be implemented at the NYISO-level.

7. What interconnection rules should the Commission consider that would allow for leveraging of waste heat as part of thermal energy networks?

NYSEIA does not have relevant experience or expertise to address this question.

8. What additional measures should the Commission consider as part of this proceeding to ensure large load and data centers are not causing cost increases to all other ratepayers, or adversely impacting reliability or the achievement of Climate Leadership and Community Protection Act objectives?

NYSEIA offered several suggestions in the body of our comments above. In addition to the specific recommendations that we put forward pertaining to interconnection cost allocation and contribution toward clean energy programs, NYSEIA encourages the Commission to think expansively about the opportunity to leverage large load customers and their relatively inelastic demand for power to reduce rates for other rate classes and to accelerate clean energy deployment.