



November 15, 2023

New York State Energy Research and Development Authority
17 Columbia Circle
Albany, NY 12203-6399
Attention: Ms. Candace Rossi

Re: NYSERDA RFI 5397 re: Agrivoltaics Research and Demonstration

Dear Ms. Rossi,

On behalf of New York's distributed solar + storage industry, the New York Solar Energy Industries Association (NYSEIA), Solar Energy Industries Association (SEIA), and the Coalition for Community Solar Access (CCSA) (collectively the "Solar Parties") are pleased to provide the following comments in response to NYSERDA RFI 5397 re: Agrivoltaics Research and Demonstration.

NYSEIA is the only statewide membership and trade association dedicated solely to advancing distributed solar + storage in New York State. Our mission is to accelerate distributed solar + storage deployment through policy/advocacy, public education, and capacity building for our members. NYSEIA's 250+ member companies employ thousands of workers in the solar + storage industry, and our members are responsible for developing and installing the vast majority of New York's existing and contracted solar capacity.

CCSA is a national coalition of businesses and nonprofits working to expand customer choice and access to solar for all American households and businesses through community solar. We work with customers, utilities, local stakeholders, and policymakers to develop and implement policies and best practices that ensure community solar programs provide a win, win, win for all, starting with the customer.

SEIA is the national trade association for the solar and solar + storage industries, building a comprehensive vision for the Solar+ Decade through research, education and advocacy. SEIA works with its 1,000 member companies and strategic partners to fight for policies that create jobs in every community and shape fair market rules that promote competition and the growth of reliable, low-cost solar power. There are more than 730 solar companies based in New York, including installers, manufacturers and service providers, as well as a variety of regional or national businesses with projects and operations in the Empire State.

Several of the Solar Parties' member companies develop agrivoltaic projects and are providing detailed feedback in response to the RFI. The Solar Parties are not addressing every question in the RFI, but instead offers three simple recommendations for NYSERDA's consideration:

1. **Proceed expeditiously.** The Solar Parties appreciate NYSERDA's commitment to advancing agrivoltaics (APV) in New York State, and we encourage NYSERDA to issue the proposed RFP as soon as possible. We recommend that NYSERDA use the initial data collected from RFP submissions to inform the design and implementation of additional state-level programs and policies to support agrivoltaics at scale.
2. **Set a minimum system size that prioritizes projects that demonstrate commercial viability.** The Solar Parties recommend that NYSERDA set a 1-megawatt minimum system size for this solicitation. There are many agrivoltaic pilot projects in operation throughout the United States and Europe. However, there are fewer demonstration projects at a commercial scale. Rather than funding small, bespoke research projects, we advocate for NYSERDA to use this RFP to provide gap funding for demonstration projects at a scale sufficient to demonstrate commercial viability, and to provide actionable information regarding the impact of APV on solar project economics and agricultural production and economics. This approach will lower the incremental cost of the program, increase the total amount of megawatts / acres of agrivoltaic applications catalyzed with finite available funding, and provide NYSERDA, policymakers, and industry with critical information that can help inform smart, long-term agrivoltaic policies and programs.
3. **De-scope the project-specific research component of the RFP, and instead centrally procure a research/monitoring & verification technical consultant.** Rather than seeking proposals that include gap funding for APV and multi-year research initiatives, we recommend that NYSERDA centrally procure and manage a research team to study the demonstration projects. We recommend that developers propose demonstration projects and the amount of gap funding they need in order to make those projects viable. NYSERDA and its selected research team can draw upon the funded projects to identify and answer key agrivoltaics research questions.¹ This approach will provide several benefits to NYSERDA and the program:
 - a. **More meaningful results.** A primary purpose of the proposed research is to acquire actionable data to inform future policies and programs. We believe NYSERDA will obtain more actionable data with a research team that works directly for NYSERDA rather than many researchers that are part of solar project development teams, each with distinct hypotheses and methodologies. In the United Kingdom, a consortium has proposed a standardized methodology to

¹ Several of our member companies have provided additional responses to this RFI with specific information regarding research questions that should be identified and how to scope the RFP to encourage a suitable range of agrivoltaic demonstration projects.



monitor biodiversity of solar farms². NYSERDA could take a similar approach to evaluating APV applications, i.e., analyzing all of the funded projects with a standard methodology. This standardized approach will provide more meaningful results to NYSERDA, policymakers and industry.

- b. **Lower cost.** Centrally procuring a research team to study and analyze the agrivoltaic demonstration projects will be more cost-effective than providing solar developers with funding for them to each procure their own research team at the project level.
- c. **Increased competition and broader participation in the RFP.** Solar developers are not research experts and don't necessarily already have research partnerships in place to put forward strong proposals. Including this requirement in the APV RFP may be a barrier to participation, limiting NYSERDA's pool of bidders and also driving up cost. We believe that NYSERDA will get lower-cost bids from solar companies and broader participation by stripping the research requirement from the RFP, and instead requiring the selected developers to provide regular site access and data to the research team as a condition of award.

The Solar Parties applaud NYSERDA for its clean energy leadership and its commitment to supporting APV in New York State. Thank you for the opportunity to provide input, and we welcome the opportunity to speak with you and provide additional information.

Sincerely,

Noah Ginsburg
Executive Director
New York Solar Energy Industries Association

Kate Daniel
Northeast Regional Director
Coalition for Community Solar Access

Valessa Souter-Kline
Northeast Regional Director
Solar Energy Industries Association

² Solar Energy UK, Lancaster University, Clarkson & Woods, Wychwood Biodiversity (2022). Solar Energy UK Guidance | Standardised approach to ecological monitoring. <https://solarenergyuk.org/wp-content/uploads/2022/06/Ecological-Monitoring-Guidance-2022.pdf>.