STATE OF NEW YORK
PUBLIC SERVICE COMMISSION

Petition of ConnectDER and Tesla to Establish a Statewide Process for Meter Socket Adapter Model Approval	**Case No. 24-E-0526**

Comments of New York Solar Energy Industries Association and Alliance for Clean Energy New York in Response to December 2025 JU Proposal Regarding Review, Approval, and Installation of Meter Socket Adapters (MSAs)

I. Background

On August 30, 2024, ConnectDER and Tesla submitted a Petition seeking to establish a Statewide Process for Meter Socket Adapter (MSA) Model Approval. On December 9, 2024 the Joint Utilities (JU) filed a comment on the Petition which presented their position and observations on meter socket adapters recommending review and approval protocols. In this period, New York Solar Energy Industries Association (NYSEIA) and Alliance for Clean Energy New York (ACE NY) submitted comments supporting the ConnectDER and Tesla petition for a statewide approval process. On December 20, 2024 ConnectDER and Tesla provided brief recommendations to address issues of implementation timelines and testing procedures raised in the Joint Utilities (JU) comments and to clarify positions Orange & Rockland (O&R) had taken regarding MSA installation. Following the first comment period, the Commission issued an order on September 22, 2025 which directed the JU to submit a proposal regarding review, approval, and installation of MSAs. On December 15, 2025, ConnectDER filed a set of comments to elaborate on best practices from states in the Mid-Atlantic and Northeast that have adopted MSA review, approval, and installation procedures. On December 22, 2025, the JU filed a Proposal Regarding Review, Approval, and Installation of Meter Socket Adapters which did not build upon the recommendations and best practices gathered from similar MSA implementation in several states across the Mid-Atlantic and Northeast regions.

II. Introduction

The JU Proposal would require a manufacturer to first obtain approval to be on the New York State Department of Public Service (DPS) approved MSA register, but this would not eliminate the requirement for separate, independent utility review and approval before deployment within any utility service territory. After obtaining a DPS approval, the JU proposes an initial fit test and evaluation to examine compatibility of the MSA with existing infrastructure. If the MSA

passes this initial evaluation, the utility may conduct additional testing which may take one year or more, subject to the individual utility having the necessary resources available.

Summary of NYSEIA and ACE NY Positions

MSAs are an important tool to lower the cost of residential clean energy upgrades that are being deployed widely and safely across North America, including in neighboring states. We support a thorough safety evaluation of new MSAs prior to their approval for installation in New York State. However, this can be achieved efficiently by leveraging certifications from Nationally Recognized Testing Laboratories and without requiring MSA manufacturers to navigate lengthy utility-specific testing and review.

We recommend the Commission utilize an approval framework similar to New York's existing inverter approval process, which has been successful in allowing timely statewide approvals while ensuring safety and reliability are maintained. The following sections further explain the proposed implementation of a DPS-maintained statewide approved MSA register.

III. NYSEIA and ACE NY Response to JU Proposal

We offer the following comments in response to key elements of the JU proposal for MSA review and approval.

A. We Support Limiting Utility Liability

NYSEIA and ACE NY agree that the utility should not be liable for damage to any person or property resulting from an MSA installation. We recommend the utilities address this risk by incorporating appropriate liability limitations into their interconnection agreement or through the use of a customer liability waiver.

B. We Support the Creation and Maintenance of a Single Statewide Approved Equipment List for MSAs

The JU proposes DPS develop and maintain an "approved MSA register". It is unclear what the JU intends to achieve by requiring manufacturers to obtain DPS approval before performing the actual testing in the proposed one year period.

We support the use of a DPS-maintained approved equipment list that streamlines testing by reducing the need for utility specific testing and duplication of work. A similar approval framework is used for inverter approval, under which DPS Staff verifies NRTL testing, compliance with applicable standards, and product specification sheets to maintain a list of approved inverters on the "Distributed Generation Information website"[1]. The approved list[2] identifies inverters that are eligible for interconnection in NYS and is used by the JU to

[1] Distributed Generation Information Website - https://dps.ny.gov/distributed-generation-information
[2] Equipment Certified Since 2011 - https://dps.ny.gov/equipment-certified-2011

determine eligibility. Under this framework individual utilities still have the opportunity to test problematic inverters.

We believe the approved inverter list is partially dependent on eligibility in California's Grid Support Solar Equipment List[3] and Grid Support Battery Inverter List[4]. While a similar list for approved MSA equipment doesn't exist, we recommend Staff maintain alignment with existing processes by verifying NRTL testing and product specification sheets and also facilitate joint testing of utilities for eligibility in "approved MSA register". The use of a well-collaborated statewide "approved MSA register" will enable efficient and timely testing of MSAs. For example, the utilities can jointly perform the initial test defined in the JU proposal as "examine the compatibility of the MSA with existing metering infrastructure and work methods and practices and conduct an initial fit test and evaluation." This will allow the JU to collaborate and more efficiently evaluate minor design variations from the same manufacturer and determine whether the changes may/ may not affect fit test and associated evaluations. The approved MSA list can also serve as a public-facing resource, identifying the MSA options available for installer selection. The utility should maintain the discretion to perform individual testing where necessary, but it should be expected that individual reviews are limited to cases where "initial fit test" results do not have a joint consensus and need further evaluation by a specific utility.

Accordingly, we recommend the Commission to continue to have DPS verify NRTL testing and product specification sheets and in parallel require the utilities to jointly perform the initial fit test and evaluation for inclusion in "approved MSA register" within 30 calendar days of receiving MSA product documentation and sample unit(s). To ensure transparent and efficient documentation, we recommend the "approved MSA register" be structured as a matrix that shows all submitted MSA products, with separate columns for DPS and each utility. Such that, at the end of the 30 day period a cell would be marked "approved" where DPS has verified the submitted documentation or where a utility has approved the initial fit test. The applicable cells should be marked "rejected" if the DPS review or JU initial test determines the MSA does not meet its requirements, or "pending approval" if additional individual testing is required.
If a utility elects to conduct additional individual testing, it should perform those tests within 60 days of receiving a sample unit, specification sheet and installation manual. The individual testing can be conducted in parallel with the joint review or be initiated no later than 15 days after the conclusion of the joint review.

C. We urge the Commission Require the Joint Utilities to Define Compatibility Differences and Cost Concerns

The proposal states that utilities "reserve the right to deny approval due to equipment or personnel safety concerns, compatibility differences between the MSA and the existing metering

[3]Grid Support Solar Inverters - https://solarequipment.energy.ca.gov/Home/InverterSolarList
[4]Grid Support Battery Inverters - https://solarequipment.energy.ca.gov/Home/InverterBatteryList

infrastructure, or cost concerns". The issues of MSA compatibility with existing infrastructure and cost concerns are discussed in the JU proposal and stakeholder comments We are concerned that use of the terms generalizes the reasons for denials, for example MSA implementation will require new training for utility meter technicians, but this reason alone can be easily defined as a cost concern to justify denial for use of any MSA. The Commission requests the JU incorporate lessons learned from their experience with MSAs, but the JU proposal does not define specific existing metering infrastructure in their territory that is problematic and likely not compatible with MSAs. We recommend the Commission prescribe the specific infrastructure configuration or cost concerns that warrant a denial of the MSA. We also recommend the Commission require the JU to identify the different metering infrastructure installed in their territory and identify specific metering infrastructure that is likely not compatible for safe MSA installations. Manufacturer instructions identify certain meter socket configurations, such as A-base style meter sockets, sockets with excessive rust or damage, sockets that are not securely attached to the building, or multi-meter installations where use of an MSA on one socket would impede access to another can have physical limitations and should be avoided. Each Utility should list problematic configurations that are readily identifiable to inform certified installers, manufacturers, DER installers and customers. This information on ineligible configurations can be hosted in the "approved MSA register" document or utility technical requirements for DER. The list of ineligible configurations will require the JU to justify the reason for this decision and also enable the industry and JU to evaluate the concerns raised in JU's proposal.

Regarding identification of existing infrastructure and installation of an MSA on a case by case basis, we recommend the Commission allow DER installers to maintain the use of certified installers to exercise engineering judgement to assess safety risks and MSA eligibility. To ensure JU concerns are addressed, the certified installers can be required to avoid the list of problematic configurations identified by the JU.

D. The Commission Should Direct Utilities to Approve the Use of MSAs that Meet Established Safety Criteria and Standards

The JU proposal stated it reserves the right to deny approval due to physical incompatibilities with meters that are ringless, ringed or that have a bypass lever in meter base. We strongly disagree that the use of MSAs should be restricted for reasons other than safety and reliability.

MSAs are compatible for use in both ringless and ringed sockets as they directly connect to the meter jaws that exist in both socket types. With respect to the bypass lever, while the installation of the MSA limits direct access to the bypass lever, experience from other states and utilities indicate that the overall customer benefits and cost savings enabled by MSAs outweigh the minor inconvenience associated with brief service interruptions during meter or socket maintenance. For the purposes of utility meter and socket servicing work, this can be performed by following procedures for meters without a bypass lever, as outlined in manufacturer

installation guides. These guides are reviewed and certified by NRTL for safety and compliance with the NEC.

E. Interactions with Advanced Metering Infrastructure

While we agree that an MSA should be rejected if it interferes with meter accuracy, we do not support rejections solely on the basis that it modifies the operation of certain AMI functions, provided that the overall safety and reliability of metering infrastructure is maintained. In some cases, certain MSAs may cause a slight delay in heat rise detection, but this impact remains within the range of UL approved standards and does not substantially impair safe response time. Manufacturers should be expected to provide supporting documentation on temperature testing results and, if necessary, facilitate laboratory witness testing.

F. Reply: Joint Utilities Considerations

We agree with most of the considerations and technical requirements mentioned in this section but strongly oppose the one year testing timeframe proposed by the JU. Most jurisdictions have adopted a 60 days to 90 day timeframe, therefore the proposed timeline is unjustified and does not align with best practices in neighboring states. We strongly recommend the Commission adopt the process explained in the previous section, which leverages best practices from similar processes facilitated by Staff and allows for utility collaboration while maintaining flexibility for utility specific testing where needed.

We do not agree that all MSAs should be certified to UL 1741. UL 1741 would only be applicable if the MSA initiates the decision to isolate the system. In most cases, this decision is made by the battery control system. UL 1741 should be a requirement for MSAs that sense and act in response to a condition but the certification should not be a mandatory requirement for all MSAs.

IV. Conclusion

MSAs are a proven, widely adopted technology that promises to lower the cost to safely integrate residential clean energy systems in New York State. A robust and standardized regulatory framework is needed to evaluate products and ensure that contractors and utilities are prepared to integrate them into their operational practices. We support many of the recommendations in the JU proposal, but encourage the Commission and Joint Utilities to adopt a more streamlined statewide approval process with expedited timelines. By standardizing MSA evaluation, the Commission can avoid the creation of a patchwork of differing regulatory requirements across utility service territories, and enable broad access to this safe, proven, cost-saving clean energy technology. NYSEIA and ACE NY appreciate the opportunity to provide feedback on this proposal.