



New York Solar Energy Industries Association 2019 POLICY PRIORITIES

- **SOLAR ENERGY GOAL:** NYSEIA urges New York State to adopt a new, robust solar goal that dramatically expands solar access and creates a stable, predictable market for solar employment and investment. The goal should be enforceable and include interim targets to ensure progress. Examples include:
 - Addition of intermediate targets to the existing Clean Energy Standard (CES) in line with prior RPS program requirements.
 - A solar-specific sub-tier/carve-out as part of the existing CES.
 - Household targets for adoption of solar (such as the Million Solar Strong campaign, which calls for powering 1 million NY homes with solar by 2023).
 - 6 gigawatts of distributed solar by 2025, as proposed in Governor Cuomo's State of the State address.

- **PREVAILING WAGE LEGISLATION:** NYSEIA has major concerns about the impact of prevailing wage legislation, which directly threatens solar jobs, economic investment, and the ability of New York to meet emissions-reduction goals.
 - NYSEIA is currently compiling research on the impact of prevailing wage requirements on project costs. Preliminary information indicates project costs could rise by as much as 25 percent of total installed costs.
 - Without a commensurate increase in state support (such as through the NY-Sun Megawatt Block Program), huge numbers of solar projects will no longer be economical. Prevailing Wage mandates are also likely to dramatically expand administrative burdens to prove compliance.
 - NYSEIA member companies—which maintain a mix of union and open shops and pay highly competitive wages and salaries as it is—already face a competitive labor market and lower incentive levels.
 - NYSEIA urges major changes to the language in last session's Senate Bills S2975A and S7971A. At a minimum, prevailing wage standards must not be applied to smaller projects of nameplate capacity less than a certain size.

- **SOLAR DISTRIBUTED GENERATION COMPENSATION:**
 - The solar compensation framework set by the Public Service Commission continues to be overly complex, uncertain/unfinanceable over the long term, and economically unviable in much of the state, with community solar still being out of reach for nearly all downstate (New York City, Long Island, Westchester) residents.

- o The Public Service Commission has put forth proposals in the Value of Distributed Energy Resources (VDER) proceeding to improve compensation levels but it is too early to know whether they will be sufficient to create a robust market.
- **BOLSTERING COMMUNITY SOLAR:** The community solar (Community Distributed Generation) program continues to fall far short of its potential.
 - o Despite providing an alternative to rooftop solar, nearly all NYC residents cannot subscribe to community solar offerings because of regulatory hurdles. These hurdles must be addressed, such as through cross-utility crediting.
 - o Non-residential customers—such as businesses, municipalities, hospitals, and schools—could lower project costs by serving as anchor customers but are discouraged from participating under the current framework.
 - o Consolidated and automated billing is key to improving the customer experience and minimizing consumer complaints.
 - o Utilities must also onboard CDG customers and apply bill credits within 30 days.
- **ADMINISTRATIVE STREAMLINING:** NYSEIA supports efforts to streamline administrative processes to reduce costs and accelerate solar growth.
 - o NYSEIA continues to lead and coordinate interconnection reform efforts through its participation in the Interconnection Policy and Technical Working Groups (IPWG and ITWG) to streamline processes and reduce interconnection-related costs.
 - o NYSEIA advances property tax policy allowing solar providers to more easily navigate local taxation while also giving tax jurisdictions fair treatment.
 - o Siting solar is very challenging in much of the state. NYSEIA supports efforts to streamline local zoning and codes to address local concerns while creating clear and cost-effective pathways for solar adoption.
 - o NYSEIA supports efforts to reform the NYS and local building codes to ensure that new homes and businesses are built solar-ready.
- **RATE DESIGN:** NYSEIA advocates for the design and implementation of electric rates that properly value and enable a high penetration of distributed generation, while recognizing the interests of utility shareholders and non-generating customers.
 - o Rates should include accurate price signals for peak, shoulder, and off-peak energy usage.
 - o Rates should be understandable, enabling customers to take responsive actions to reduce their usage, shift their load profile, or install on-site generation.
 - o Net energy metering customers should be allowed to remain on their current rate form, with the option to move into new rate forms.

About New York Solar Energy Industries Association

Founded in 1994, New York Solar Energy Industries Association (NYSEIA) is the only statewide membership and trade association dedicated solely to advancing solar energy use in New York State. NYSEIA proudly represents hundreds of businesses across New York State that employ thousands of workers throughout the solar value chain. Led by a diverse board of directors, NYSEIA strives to achieve significant, long-term, and sustainable growth of solar energy in New York State.