



April 2, 2020

Mrs. Alicia Barton
New York State Energy Research and Development Authority
17 Columbia Circle
Albany, NY 12203-6399

Re: Revising NY Sun Extensions Policies

Dear Mrs. Alicia Barton:

The Coronavirus (COVID-19) pandemic has created unprecedented change throughout the United States. The undersigned parties want to express our profound gratitude for Governor Cuomo's leadership and response to the COVID-19 crisis. The gravity of the situation in New York is breathtaking and we understand the extraordinary steps your agency has been forced to take.

However, as you have already acknowledged we also need to look ahead at the potential economic effects of this crisis and its impact on New York's objective of a transition to a cleaner and more affordable energy system for all New Yorkers.

We are closely monitoring the outbreak of COVID-19, its impact on the American workforce and effects to the global supply chain. Unfortunately, the COVID-19 pandemic is taking a toll on the solar industry. For example, SEIA is getting reports from our members across the country about supply chain disruptions, project delays, sales challenges, challenges in signing up community solar subscribers, employee layoffs, furloughs and more. Put simply, solar companies are already feeling the effects of these dramatic market disruptions. The COVID-19 crisis is hurting solar jobs and investments at a time when we need them most.

As you consider steps to respond to COVID-19 and stimulate the economy, we ask that the New York State Energy Research and Development Authority (NYSERDA) extends NY Sun construction timelines by at least 6 months, a move we believe will help stabilize the solar industry and provide certainty to the industry's financing partners.

The undersigned parties ask that NYSERDA make immediate changes to program requirements regarding additional extensions and explicitly authorize multiple extensions as they are needed. The current disruption to the construction process for many projects will have long lasting impacts.

Although NYSERDA states that "[p]roject extensions will be granted for legitimate and verifiable reasons which are beyond the control of the contractor, builder, or customer," SEIA recommends that NYSERDA issue further explicit guidance or update the NY Sun Program Manuals to create a blanket extension based on the current circumstances.

We appreciate New York State's response to the unprecedented challenge of the COVID-19 pandemic. We look forward to working together in these trying times to maintain New York's national leadership position in solar.

Thank you for considering these recommendations. We will be following up by phone shortly and please contact David Gahl dgahl@seia.org with any questions about these requests in the meantime.

Respectfully submitted,

/s/

David Gahl, Senior Director of State Affairs
Solar Energy Industries Association

/s/

Anne Reynolds, Executive Director
Alliance for Clean Energy New York

/s/

Erika Niedowski, Northeast Director
Coalition for Community Solar Access

/s/

Shyam Mehta, Executive Director
New York Solar Energy Industries Association

/s/

Stephan Roundtree, Northeast Director
Vote Solar

cc: Peter Olmsted, Chief of Staff, NYSERDA
David Sandbank, Vice President, Distributed Energy Resources, NYSERDA