



VIA ELECTRONIC FILING

September 12, 2025

New York Power Authority
123 Main Street
White Plains, NY, 10601-3170

Re: Comments of New York Solar Energy Industries Association on the NYPA Renewables Draft Strategic Plan

To Whom it May Concern,

New York Solar Energy Industries Association (NYSEIA) appreciates the opportunity to provide comments in response to the NYPA Renewables Draft Strategic Plan.

Attached please find our comments. Feel free to contact me if you have any questions.

Thank you.

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New York Solar Energy Industries Association
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COMMENTS OF NEW YORK SOLAR ENERGY INDUSTRIES ASSOCIATION IN RESPONSE TO THE NEW YORK POWER AUTHORITY DRAFT RENEWABLES STRATEGIC PLAN

September 12, 2025

Background and Introduction

New York Solar Energy Industries Association (NYSEIA) appreciates the opportunity to comment on the New York Power Authority's (NYPA) Draft Renewables Updated Strategic Plan. As New York confronts rising energy costs and affordability challenges across its communities, distributed solar and storage play a central role in delivering long-term, cost-effective energy solutions for households, businesses, and public institutions.

Private sector developers have built a robust and competitive distributed solar market in New York, helping to reduce energy bills, create local jobs, and expand access to clean energy. NYSEIA's members have demonstrated that, when supported by smart policy and regulatory frameworks, private investment can deliver affordable energy at scale. As NYPA expands its development activity, we urge the Authority to focus on complementing—not competing with—private sector efforts, and to prioritize projects that would not otherwise move forward due to economic or structural barriers.

NYSEIA appreciates NYPA's commitment to co-development agreements and stakeholder engagement. These mechanisms are essential to ensuring that NYPA's market participation is strategic and additive, helping to crowd in private capital rather than crowd it out. We encourage NYPA to continue working closely with private developers to use its platform to advocate for reforms that directly impact affordability—such as interconnection cost certainty, siting reform, and rate design improvements.

Shared Barriers and Opportunities for Reform

NYPA will face many of the same challenges that private developers encounter, particularly around interconnection and siting. Interconnection costs for distributed energy resources have increased dramatically—by a factor of five over the past five years—and restrictive local laws and moratoria continue to delay or block projects. NYSEIA sees a strong opportunity for NYPA to partner with the private sector to advocate for reforms that reduce costs and accelerate deployment.

We urge NYPA to take a more proactive role in addressing the systemic challenges that continue to drive up costs and delay clean energy deployment. Chief among these are the inefficiencies in New York's interconnection process, which require 21st Century technologies and smart grid controls to allow for streamlined and cost-effective grid integration. Developers also face significant financial uncertainty due to unpredictable and escalating interconnection costs. Establishing mechanisms that provide greater cost certainty would help mitigate risk and improve project viability.

In addition, siting remains a persistent barrier, with restrictive local laws and moratoria often stalling projects that would otherwise deliver affordable energy to communities. NYPA is

well-positioned to advocate for reforms that modernize permitting processes and reduce delays caused by outdated or excessively restrictive zoning and land-use regulations.

By engaging in these policy conversations and lending its institutional weight, NYPA can help shape a more efficient and cost-effective development landscape that benefits all stakeholders.

Workforce Development and Collaboration

NYSEIA commends NYPA's investment in workforce development, including its \$25 million annual commitment to training programs. These initiatives are essential to building a skilled clean energy workforce and represent a clear area for collaboration with NYSEIA's member companies, many of which are actively hiring and training workers across the state.

We encourage NYPA to explore joint workforce initiatives with private developers, including apprenticeship programs, regional training hubs, and targeted support for disadvantaged communities. These collaborative initiatives will provide critical, family-sustaining jobs for New Yorkers across the state.

Conclusion

As NYPA moves forward with implementing its Renewables Strategic Plan, NYSEIA encourages the Authority to remain focused on the areas where it can have the greatest impact: enabling projects that face structural barriers, advocating for reforms that reduce cost, and partnering with the private sector to expand access to affordable clean energy.

The private distributed solar and storage industry has demonstrated its ability to deliver cost-effective solutions at scale. NYPA's strategic advantage lies in its ability to unlock opportunities that are out of reach for the private market alone—whether due to land access, financing constraints, or regulatory complexity. By focusing on these high-impact areas, NYPA can achieve additionality while ensuring that the benefits of clean energy reach the communities that need them most.

We urge NYPA to continue building on its collaborative approach—through co-development, workforce partnership, and policy advocacy—and to use its institutional voice to help shape a more efficient, equitable, and affordable energy system for all New Yorkers. NYSEIA stands ready to work alongside NYPA to advance a clean energy transition that is not only ambitious, but also inclusive, cost-effective, and grounded in the strengths of both public and private leadership.