TPAS Comment From NYSERDA's Build-Ready Program

On behalf of the NYSERDA Build-Ready Program, the following comment is respectfully submitted for NYISO consideration in the TPAS process:

In the current Small Generator Interconnection Process (SGIP), when non-local upgrades are identified, the project is pushed into the Class Year process so that the upgrade costs may be apportioned. Although this may financially benefit an interconnection customer by offsetting the upgrade costs, it may also disadvantage the developer significantly due to the added schedule associated with the Class Year process. To address this moving forward, NYISO should consider modification of the SGIP to allow a developer to “opt out” of this cost share apportionment and avoid the Class Year process if they agree to bear the total cost of both local and non-local upgrades, forfeiting the right to seek cost recovery on those upgrades. This would allow the project schedule to be maintained in the event that project schedule was more important to the developer than availing themselves of the cost-share mechanism of the Class Year process.

Thank you,

Thomas J. King

Senior Counsel

NYSERDA

17 Columbia Circle | Albany, NY 12203-6399

P: 518-862-1090 ext. 3609 | C: 518-605-5973

Email: