

The Long Island Solar and Storage Alliance (LISSA), a steering committee of the New York Solar Energy Industries Association (NYSEIA) appreciates the opportunity to submit comments on the future management of the Long Island Power Authority's assets.

LISSA strongly supports LIPA assessing management options and reviewing its role as a utility provider. With that in mind, LISSA is not supporting any particular management option, but would like to ensure that LIPA's future is dedicated to the safe, reliable, and expedient deployment of solar energy. We would like to reinforce the importance of solar within New York State's energy mix, and respectfully request that LIPA consider the following comments when reviewing their management structure.

The Climate Leadership and Community Protection Act (CLCPA) has mandated that New York State deploy 6 GW-DC of solar PV by 2025. Based on Long Island's share of NYS peak load and its population, LIPA has determined that its share of the CLCPA 6 GW goal is 750 MW-DC of solar PV by 2025. This allocation is proportionately correct, and LIPA should be credited for establishing a short term Long Island-specific goal. However, given Long Island's well-established role as a leader in New York State's residential and small commercial solar market, and the significant lift required for Long Island to achieve its share of the state's out-year CLCPA goals of 70% and 100% electric decarbonization by 2030 and 2040 respectively, given the share of fossil fuel generation on Long Island (over 90%)¹ compared to upstate regions, LISSA recommends that LIPA sets a more aggressive goal for near-term DG solar deployments in the order of 1.2 GW-DC.

Long Island is the heart of the state's solar market, with almost 30% of the state's installed distributed solar capacity.² However, as referenced earlier, distributed solar installations and deployment have been declining on Long Island in recent years, while they have increased substantially in other parts of the state. At the same time, renewables comprised only 8% of overall electric capacity on Long Island in 2018, compared to 26% for the rest of the state.³ To

¹ Includes both distribution-level and transmission-level capacity. [2018 NYISO Gold Book, p.66](#) and [DPS SIR Inventory Data](#). Excludes nuclear.

² [DPS SIR Inventory Data, PSEG-LI](#).

³ Includes both distribution-level and transmission-level capacity. [2018 NYISO Gold Book, p.66](#) and [DPS SIR Inventory Data](#). Excludes nuclear.

ensure that Long Island adheres to the out-year CLCPA mandates of 70% renewable energy by 2030 and 100% carbon free electricity by 2040, LISSA strongly recommends LIPA establish a concrete roadmap with concrete targets beyond 2025 to achieve its share of these targets as soon as possible, with the specific contributions of distributed solar, transmission-level solar, onshore wind and off-shore wind outlined. In order to track Long Island's progress towards CLCPA mandates, LISSA also recommends that LIPA maintain a website providing detailed quarterly and annual accounting of Long Island's electric generation and load profile, including the contribution of renewable energy vis-à-vis fossil fuel generation.

The historical success of the distributed solar market on Long Island was made possible by the availability of robust incentives in the form of rebates for residential and commercial solar systems through NYSERDA's NY-Sun program. However, residential and commercial incentives expired in 2016 and 2019 respectively, and the only proposed investment in solar incentives for Long Island going forward at this time is an allocation of \$1.2 million to extend the \$200 per kilowatt (kW) rebate for Community Solar projects up to 750kW in size, detailed in PSEG-LI's Energy Efficiency and Demand Response (EEDR) Plan for 2021.⁴ This is a small fraction of the proposed 2021 investment in efficient products of \$18.93 million and commercial efficiency of \$35.05 million.⁵ LIPA's relative lack of support for solar going forward is made symbolically evident by the title of the EEDR plan itself, which references energy efficiency (EE) and demand response (DR) programs, but not solar, energy storage, or other renewable generation technologies. In previous years, this plan was referred to as the "Energy Efficiency and Renewables Plan" (EERP). Overall, significantly more investment in distributed solar and storage incentives is required by LIPA to place the region on a sustainable path to a carbon-free electric future in compliance with 2030 and 2040 CLCPA mandates.

Constraints to existing hosting capacity on Long Island's distribution grid to accommodate a higher volume of distributed generation, as well the high costs associated with the upgrades necessary to increase hosting capacity, have long been first-order barriers to scaling up distributed solar and storage deployments on Long Island. As directed by the New York Public

⁴ PSEG-LI Utility 2.0 Long Range Plan & Energy Efficiency and Demand Response Plan, 2020 Annual Update.

⁵ Ibid.

Service Commission for other utility territories in the state⁶, LIPA should conduct a comprehensive study for the purpose of identifying distribution upgrades and local transmission upgrades that are necessary or appropriate to facilitate the timely achievement of the CLCPA targets, with the following aims:

1. Evaluate the local transmission and distribution system of the individual service territories, to understand where capacity “headroom” exists on the existing system;
2. Identify existing constraints or bottlenecks that limit energy deliverability;
3. Consider synergies with traditional Capital Expenditure projects - drivers of synergies could include aging infrastructure, reliability, resilience, market efficiency, and operational flexibility;
4. Identify least-cost upgrade projects to increase the capacity of the existing system;
5. Identify potential new or emerging solutions that can accompany or complement traditional upgrades;
6. Identify potential new projects which would increase DER hosting capacity on the local distribution system to allow for interconnection of new renewable generation resources;
7. Identify the possibility of fossil generation retirements and the impacts and potential availability of those interconnection points.

LISSA appreciates the opportunity to provide comments in response to LIPA’s request for comments on the future management of LIPA’s assets. We look forward to working with LIPA to implement our recommendations as we work together to transition Long Island to a cleaner, carbon-free future in line with the CLCPA mandates. Please contact Tara McDermott, LISSA Chair, with any questions about this submission.

Respectfully submitted,

⁶ *Order on Transmission Planning Pursuant to the Accelerated Renewable Energy Growth and Community Benefit Act*, May 14, 2020.

/s/

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