

January 28, 2025

Re: Ascent Renewables Testimony to Joint Legislative Budget Hearing on Energy and Environmental Conservation Regarding the 2025-2026 Executive Budget

Dear Senator Kreuger and Assemblymember Pretlow,

I'm writing to you from Ascent Renewables regarding the 2025-2026 executive budget.

While we are a small development company, we have developed nearly \$100,000,000 of solar projects over the past five (5) years and created approximately \$50,000,000 in construction wages that were paid to local New York State construction workers. The aforementioned dollar amount does not include the financial injection into the local New York economies during the construction period of four (4) to eight (8) months per project. While we are helping stimulate the economy, our solar projects help strengthen the grid during peak summer demand.

Increasing solar energy supply in New York can directly advance the Governor's Affordability Agenda by lowering electricity bills for homes and businesses across the state. However, the 2025-2026 Executive Budget and the Governor's policy agenda outlined in her State-of-the-State address do not include any policies to advance cost-effective solar deployment in New York State.

Rooftop and community solar ("distributed solar") is New York's most successful clean energy sector and continues to have incredible momentum following a record-setting year for the state. It is also the sector that employs the most workers, with 15,490 employees based on NYSERDA's 2024 jobs census. Despite our industry's momentum, we are facing major challenges that threaten New York's solar industry, companies like mine, and our skilled workforce. These challenges can be overcome with smart policy proposals, and I encourage you to consider the following proposals in the 2025-2026 budget.

Raising the state's distributed solar goal to 20 gigawatts by 2035 ("20x35") will further push New York to close the gap on its renewable energy targets while lowering energy costs for families and businesses. In June 2024, NYSEIA released [20 Gigawatts by 2035](#), a policy roadmap to accelerate distributed solar deployment in New York. Adopting the proposals in this roadmap will deliver \$50B in direct utility bill savings to families and businesses, lower the cost of electricity for all customers, and create 15,000 additional sustainable jobs in the solar industry.

Currently, community-scale solar projects face both siting and interconnection challenges, delaying the development of many solar projects throughout the state.

Community-scale projects are permitted by local governments, who are increasingly adopting restrictive local laws and moratoria in response to utility-scale projects and/or misinformation. An estimated 4.6 gigawatts of otherwise viable community solar projects are being blocked due to restrictive local laws. New York can easily replicate Illinois' model of siting reform, where the state streamlines local permitting by creating statewide standards for community solar while keeping project-specific zoning decisions at the local level. This approach simultaneously respects "home rule" while creating viable permitting pathways for community solar projects across the state.

At the beginning of this year, the DEC drastically expanded its jurisdiction over wetlands and surrounding areas, with the agency's jurisdiction set to expand further in the coming years. Protecting New York's ecological resources is important, but it must be balanced with the need to deploy renewable energy. The DEC does not yet have a general permit for solar projects, and until now the agency has enforced a de facto ban against solar on any land it regulates. This is causing community companies to cease all new solar development in the state, imperiling our clean energy progress and solar workforce. We urge the DEC to rapidly develop a general permit that allows solar on most sites where it would be permitted by the national standard—USACE's Nationwide Permit 51.

Regarding interconnection, New York solar and energy storage developers pay utilities to upgrade distribution systems in order to interconnect their projects to the grid, but the companies do not have any control over the work completed by the utility company, nor is there regulatory oversight on these utility costs. The cost to interconnect new projects has risen faster than inflation due to the utilities' inefficient designs, high overhead, and unchecked cost overruns. Better regulating utility interconnection costs and implementing a flexible

interconnection program– where utilities actively manage distributed energy resources with smart grid technology rather than overbuilding traditional utility infrastructure– will lower interconnection costs and shorten the timeline to connect new projects.

Finally, the NY-Sun program is NYSERDA's most successful clean energy program, supporting solar projects across much of New York State with modest capacity-based incentives, which are nearly exhausted. Near-term action is needed for market continuity, but long-term action will provide market-certainty and attract investment. Thus, NYSERDA's NY-Sun program must be extended, especially targeted to projects that directly lower energy costs for low- to moderate-income households or projects that are beneficially sited to minimize land use impacts.

Thank you for the opportunity to provide input, and for your important work to protect New York's environment and cost-effectively increase clean energy supply.

Regards,

Teddy Epstein
Managing Partner
Ascent Renewables
M: 973-454-4481
E: teddy.epstein@ascentrenew.com
W: www.ascentrenew.com

Dear Senator Kreuger and Assemblymember Pretlow,

I'm writing to you from Carson Power regarding the 2025-2026 executive budget.

Carson Power is a woman-owned developer of community solar and energy storage resources. Headquartered in New York City, Carson Power's 20 employees are working to bring clean energy, local job creation, and tangible investments to communities across New York State – from the Canadian border and the Finger Lakes to the downstate suburbs and everywhere in between.

Increasing solar energy supply in New York can directly advance the Governor's Affordability Agenda by lowering electricity bills for homes and businesses across the state. However, the 2025-2026 Executive Budget and the Governor's policy agenda outlined in her State-of-the-State address do not include any policies to advance cost-effective solar deployment in New York State.

Rooftop and community solar ("distributed solar") is New York's most successful clean energy sector, and continues to have incredible momentum following a record-setting year for the state. It is also the sector that employs the most workers, with 15,490 employees based on NYSEIDA's 2024 jobs census. Despite our industry's momentum, we are facing major challenges that threaten New York's solar industry, companies like mine, and our skilled workforce. These challenges can be overcome with smart policy proposals, and I encourage you to consider the following proposals in the 2025-2026 budget.

Raising the state's distributed solar goal to 20 gigawatts by 2035 ("20x35") will further push New York to close the gap on its renewable energy targets while lowering energy costs for families and businesses. In June 2024, NYSEIA released [20 Gigawatts by 2035](#), a policy roadmap to accelerate distributed solar deployment in New York. Adopting the proposals in this roadmap will deliver \$50B in direct utility bill savings to families and businesses, lower the cost of electricity for all customers, and create 15,000 additional sustainable jobs in the solar industry.

Currently, community-scale solar projects face both siting and interconnection challenges, delaying the development of many solar projects throughout the state.

Community-scale projects are permitted by local governments, who are increasingly adopting restrictive local laws and moratoria in response to utility-scale projects and/or misinformation. An estimated 4.6 gigawatts of otherwise viable community solar projects are being blocked due to restrictive local laws. New York can easily replicate Illinois' model of siting reform, where the state streamlines local permitting by creating statewide standards for community solar while keeping project-specific zoning decisions at the local level. This approach simultaneously respects "home rule" while creating viable permitting pathways for community solar projects across the state.

At the beginning of this year, the DEC drastically expanded its jurisdiction over wetlands and surrounding areas, with the agency's jurisdiction set to expand further in the coming years. Protecting New York's ecological resources is important, but it must be balanced with the need to deploy renewable energy. The DEC does not yet have a general permit for solar projects, and until now the agency has enforced a de facto ban against solar on any land it regulates. This is causing community companies to cease all new solar development in the state, imperiling our clean energy progress and solar workforce. We urge the DEC to rapidly develop a general permit that allows solar on most sites where it would be permitted by the national standard— USACE's Nationwide Permit 51.

Regarding interconnection, New York solar and energy storage developers pay utilities to upgrade distribution systems in order to interconnect their projects to the grid, but the companies do not have any control over the work completed by the utility company, nor is there regulatory oversight on these utility costs. The cost to interconnect new projects has risen faster than inflation due to the utilities' inefficient designs, high overhead, and unchecked cost overruns. Better regulating utility interconnection costs and implementing a flexible interconnection program— where utilities actively

manage distributed energy resources with smart grid technology rather than overbuilding traditional utility infrastructure— will lower interconnection costs and shorten the timeline to connect new projects.

Finally, the NY-Sun program is NYSERDA's most successful clean energy program, supporting solar projects across much of New York State with modest capacity-based incentives, which are nearly exhausted. Near-term action is needed for market continuity, but long-term action will provide market-certainty and attract investment. Thus, NYSERDA's NY-Sun program must be extended, especially targeted to projects that directly lower energy costs for low- to moderate-income households or projects that are beneficially sited to minimize land use impacts.

Thank you for the opportunity to provide input, and for your important work to protect New York's environment and cost-effectively increase clean energy supply.


Sincerely,

Emilie Flanagan



Emilie Flanagan

Chief Executive Officer

 (917) 407-8888

 eflanagan@carson-power.com

 www.carson-power.com

January 28, 2025

Re: CVE North America Testimony to Joint Legislative Budget Hearing on Energy and Environmental Conservation Regarding the 2025-2026 Executive Budget

Dear Senator Kreuger and Assemblymember Pretlow,

I'm writing to you from CVE North America regarding the 2025-2026 executive budget.

CVE North America, Inc. (CVE NA) is a developer and independent power producer (IPP) based in New York City, with 41 full-time employees. CVE NA's core business is focused on solar energy that is produced and consumed locally in a distributed generation model, with a focus on community solar.

Increasing solar energy supply in New York can directly advance the Governor's Affordability Agenda by lowering electricity bills for homes and businesses across the state. However, the 2025-2026 Executive Budget and the Governor's policy agenda outlined in her State-of-the-State address do not include any policies to advance cost-effective solar deployment in New York State.

Rooftop and community solar ("distributed solar") is New York's most successful clean energy sector, and continues to have incredible momentum following a record-setting year for the state. It is also the sector that employs the most workers, with 15,490 employees based on NYSERDA's 2024 jobs census. Despite our industry's momentum, we are facing major challenges that threaten New York's solar industry, companies like mine, and our skilled workforce. These challenges can be overcome with smart policy proposals, and I encourage you to consider the following proposals in the 2025-2026 budget.

Raising the state's distributed solar goal to 20 gigawatts by 2035 ("20x35") will further push New York to close the gap on its renewable energy targets while lowering energy costs for families and businesses. In June 2024, NYSEIA released [20 Gigawatts by 2035](#), a policy roadmap to accelerate distributed solar deployment in New York. Adopting the proposals in this roadmap will deliver \$50B in direct utility bill savings to families and businesses, lower the cost of electricity for all customers, and create 15,000 additional sustainable jobs in the solar industry.

Currently, community-scale solar projects face both siting and interconnection challenges, delaying the development of many solar projects throughout the state.

Community-scale projects are permitted by local governments, who are increasingly adopting restrictive local laws and moratoria in response to utility-scale projects and/or misinformation. An estimated 4.6 gigawatts of otherwise viable community solar projects are being blocked due to restrictive local laws. New York can easily replicate Illinois' model of siting reform, where the state streamlines local permitting by creating statewide standards for community solar while

keeping project-specific zoning decisions at the local level. This approach simultaneously respects “home rule” while creating viable permitting pathways for community solar projects across the state.

At the beginning of this year, the DEC drastically expanded its jurisdiction over wetlands and surrounding areas, with the agency’s jurisdiction set to expand further in the coming years. Protecting New York’s ecological resources is important, but it must be balanced with the need to deploy renewable energy. The DEC does not yet have a general permit for solar projects, and until now the agency has enforced a de facto ban against solar on any land it regulates. This is causing community companies to cease all new solar development in the state, imperiling our clean energy progress and solar workforce. We urge the DEC to rapidly develop a general permit that allows solar on most sites where it would be permitted by the national standard—USACE’s Nationwide Permit 51.

Regarding interconnection, New York solar and energy storage developers pay utilities to upgrade distribution systems in order to interconnect their projects to the grid, but the companies do not have any control over the work completed by the utility company, nor is there regulatory oversight on these utility costs. The cost to interconnect new projects has risen faster than inflation due to the utilities’ inefficient designs, high overhead, and unchecked cost overruns. Better regulating utility interconnection costs and implementing a flexible interconnection program— where utilities actively manage distributed energy resources with smart grid technology rather than overbuilding traditional utility infrastructure— will lower interconnection costs and shorten the timeline to connect new projects.

Finally, the NY-Sun program is NYSERDA’s most successful clean energy program, supporting solar projects across much of New York State with modest capacity-based incentives, which are nearly exhausted. Near-term action is needed for market continuity, but long-term action will provide market-certainty and attract investment. Thus, NYSERDA’s NY-Sun program must be extended, especially targeted to projects that directly lower energy costs for low- to moderate-income households or projects that are beneficially sited to minimize land use impacts.

Thank you for the opportunity to provide input, and for your important work to protect New York’s environment and cost-effectively increase clean energy supply.

Sincerely,

David Froelich

Director of Business Development

CVE North America

January 28, 2025

Re: PlugPV Testimony to Joint Legislative Budget Hearing on Energy and Environmental Conservation Regarding the 2025-2026 Executive Budget

Dear Senator Kreuger and Assemblymember Pretlow,

I'm writing to you from PlugPV regarding the 2025-2026 executive budget.

PlugPV is a residential solar company with headquarters in Troy, NY. We now operate in 8 states, employ over 130 people, and support over 100 independent sales contractors. The vast majority are based right here in NY. NYS's past stability in the solar industry through fair incentives has allowed us to geographically expand throughout the Northeast and Florida, and bring that profit back to NY, creating additional tax revenue for the state. Continued support is essential during current headwinds in the industry to ensure this continues, and allow us to create more NY based jobs.

Increasing solar energy supply in New York can directly advance the Governor's Affordability Agenda by lowering electricity bills for homes and businesses across the state. However, the 2025-2026 Executive Budget and the Governor's policy agenda outlined in her State-of-the-State address do not include any policies to advance cost-effective solar deployment in New York State.

Rooftop and community solar ("distributed solar") is New York's most successful clean energy sector, and continues to have incredible momentum following a record-setting year for the state. It is also the sector that employs the most workers, with 15,490 employees based on NYSEIDA's 2024 jobs census. Despite our industry's momentum, we are facing major challenges that threaten New York's solar industry, companies like mine, and our skilled workforce. These challenges can be overcome with smart policy proposals, and I encourage you to consider the following proposals in the 2025-2026 budget.

Raising the state's distributed solar goal to 20 gigawatts by 2035 ("20x35") will further push New York to close the gap on its renewable energy targets while lowering energy costs for families and businesses. In June 2024, NYSEIA released [20 Gigawatts by 2035](#), a policy roadmap to accelerate distributed solar deployment in New York. Adopting the proposals in this roadmap will deliver \$50B in direct utility bill savings to families and businesses, lower the cost of electricity for all customers, and create 15,000 additional sustainable jobs in the solar industry.

The Governor expressed concerns about affordability in her State of the State address and Executive Budget proposal. Without urgent action, rising energy demands and inflation will

cause energy costs to become an extreme financial burden on New Yorkers. Energy bills are already the third largest expense for New York households, with lower income households spending 10-20% of their income on energy alone.

Rooftop solar can be an affordable solution to this with the modernization of the residential solar tax credit. [Legislators and a coalition of renewable energy, housing and environmental organizations have advocated to raise the per-household cap for New York's only statewide solar incentive and make the credit accessible to low-income homeowners and seniors.](#) Thus, including [S.2626 \(Harckham\)](#) / [A.1373 \(Walker\)](#) in the final budget will make it more affordable for homeowners across the state to install rooftop solar panels.

Finally, the NY-Sun program is NYSERDA's most successful clean energy program, supporting solar projects across much of New York State with modest capacity-based incentives, which are nearly exhausted. Near-term action is needed for market continuity, but long-term action will provide market-certainty and attract investment. Thus, NYSERDA's NY-Sun program must be extended, especially targeted to projects that directly lower energy costs for low- to moderate-income households.

Thank you for the opportunity to provide input, and for your important work to protect New York's environment and cost-effectively increase clean energy supply.

Sincerely,

Shane Nolan

CFO & Cofounder

PlugPV

January 28, 2025

Re: ALLEGRO POWER Testimony to Joint Legislative Budget Hearing on Energy and Environmental Conservation Regarding the 2025-2026 Executive Budget

Dear Senator Kreuger and Assemblymember Pretlow,

I'm writing to you from Allegro Power regarding the 2025-2026 executive budget.

Allegro Power is celebrating our 15th anniversary as a solar installation company based in Buffalo, NY. Over the last 15 years in business, we have created a strong green workforce working throughout New York State. We have completed thousands of solar installations and trained our electricians and solar installers to be experts in the field. We currently have 25 employees supporting their FAMILIES in great paying jobs. In addition to our employees, we have trained countless other subcontractors how to install solar as they work alongside us on projects.

Increasing solar energy supply in New York can directly advance the Governor's Affordability Agenda by lowering electricity bills for homes and businesses across the state. However, the 2025-2026 Executive Budget and the Governor's policy agenda outlined in her State-of-the-State address do not include any policies to advance cost-effective solar deployment in New York State.

Rooftop and community solar ("distributed solar") is New York's most successful clean energy sector, and continues to have incredible momentum following a record-setting year for the state. It is also the sector that employs the most workers, with 15,490 employees based on NYSERDA's 2024 jobs census. Despite our industry's momentum, we are facing major challenges that threaten New York's solar industry, companies like mine, and our skilled workforce. These challenges can be overcome with smart policy proposals, and I encourage you to consider the following proposals in the 2025-2026 budget.

Raising the state's distributed solar goal to 20 gigawatts by 2035 ("20x35") will further push New York to close the gap on its renewable energy targets while lowering energy costs for families and businesses. In June 2024, NYSEIA released [20 Gigawatts by 2035](#), a policy roadmap to accelerate distributed solar deployment in New York. Adopting the proposals in this roadmap will deliver \$50B in direct utility bill savings to families and businesses, lower the cost of electricity for all customers, and create 15,000 additional sustainable jobs in the solar industry.

The Governor expressed concerns about affordability in her State of the State address and Executive Budget proposal. Without urgent action, rising energy demands and inflation will cause energy costs to become an extreme financial burden on New Yorkers. Energy bills are already the third largest expense for New York households, with lower income households spending 10-20% of their income on energy alone.

Rooftop solar can be an affordable solution to this with the modernization of the residential solar tax credit. [Legislators and a coalition of renewable energy, housing and environmental organizations have advocated to raise the per-household cap for New York's only statewide solar incentive and make the credit accessible to low-income homeowners and seniors.](#) Thus, including [S.2626 \(Harckham\)](#) / [A.1373 \(Walker\)](#) in the final budget will make it more affordable for homeowners across the state to install rooftop solar panels.

Finally, the NY-Sun program is NYSERDA's most successful clean energy program, supporting solar projects across much of New York State with modest capacity-based incentives, which are nearly exhausted. Near-term action is needed for market continuity, but long-term action will provide market-certainty and attract investment. Thus, NYSERDA's NY-Sun program must be extended, especially targeted to projects that directly lower energy costs for low- to moderate-income households.

Thank you for the opportunity to provide input, and for your important work to protect New York's environment and cost-effectively increase clean energy supply.

Sincerely,

Paige Mecca
President

Allegro Power, LLC
6500 Sheridan Drive
Suite 100
Williamsville, NY 14221

Local Phone - 716-568-8866
Toll Free – 877-651-5616

Like us: <https://www.facebook.com/AllegroPower>



January 27, 2025

Re: Montante Solar Testimony to Joint Legislative Budget Hearing on Energy and Environmental Conservation Regarding the 2025-2026 Executive Budget

Dear Senator Kreuger and Assemblymember Pretlow:

I'm writing to you from Montante Solar regarding the 2025-2026 executive budget.

Montante Solar is a leading solar developer and construction company based in Buffalo, New York, with 95 employees across the state. We specialize in solar energy solutions, contributing to New York's clean energy transition by developing and constructing rooftop and community solar projects on behalf of ratepayers including large industrial companies and K-12 school districts that deliver affordable, sustainable power to businesses and communities statewide.

Increasing solar energy supply in New York can directly advance the Governor's Affordability Agenda by lowering electricity bills for homes and businesses across the state. However, the 2025-2026 Executive Budget and the Governor's policy agenda outlined in her State-of-the-State address do not include any policies to advance cost-effective solar deployment in New York State.

Rooftop and community solar ("distributed solar") is New York's most successful clean energy sector, and continues to have incredible momentum following a record-setting year for the state. It is also the sector that employs the most workers, with 15,490 employees based on NYSEIDA's 2024 jobs census. Despite our industry's momentum, we are facing major challenges that threaten New York's solar industry, companies like mine, and our skilled workforce. These challenges can be overcome with smart policy proposals, and I encourage you to consider the following proposals in the 2025-2026 budget.

Raising the state's distributed solar goal to 20 gigawatts by 2035 ("20x35") will further push New York to close the gap on its renewable energy targets while lowering energy costs for families and businesses. In June 2024, NYSEIA released [20 Gigawatts by 2035](#), a policy roadmap to accelerate distributed solar deployment in New York. Adopting the proposals in this roadmap will deliver \$50B in direct utility bill savings to families and businesses, lower the cost of electricity for all customers, and create 15,000 additional sustainable jobs in the solar industry.





Currently, community-scale solar projects face both siting and interconnection challenges, delaying the development of many solar projects throughout the state.

Community-scale projects are permitted by local governments, who are increasingly adopting restrictive local laws and moratoria in response to utility-scale projects and/or misinformation. An estimated 4.6 gigawatts of otherwise viable community solar projects are being blocked due to restrictive local laws. New York can easily replicate Illinois' model of siting reform, where the state streamlines local permitting by creating statewide standards for community solar while keeping project-specific zoning decisions at the local level. This approach simultaneously respects "home rule" while creating viable permitting pathways for community solar projects across the state.

At the beginning of this year, the DEC drastically expanded its jurisdiction over wetlands and surrounding areas, with the agency's jurisdiction set to expand further in the coming years. Protecting New York's ecological resources is important, but it must be balanced with the need to deploy renewable energy. The DEC does not yet have a general permit for solar projects, and until now the agency has enforced a de facto ban against solar on any land it regulates. This is causing community companies to cease all new solar development in the state, imperiling our clean energy progress and solar workforce. We urge the DEC to rapidly develop a general permit that allows solar on most sites where it would be permitted by the national standard— USACE's Nationwide Permit 51.

Regarding interconnection, New York solar and energy storage developers pay utilities to upgrade distribution systems in order to interconnect their projects to the grid, but the companies do not have any control over the work completed by the utility company, nor is there regulatory oversight on these utility costs. The cost to interconnect new projects has risen faster than inflation due to the utilities' inefficient designs, high overhead, and unchecked cost overruns. Better regulating utility interconnection costs and implementing a flexible interconnection program— where utilities actively manage distributed energy resources with smart grid technology rather than overbuilding traditional utility infrastructure— will lower interconnection costs and shorten the timeline to connect new projects.

Finally, the NY-Sun program is NYSERDA's most successful clean energy program, supporting solar projects across much of New York State with modest capacity-based incentives, which are nearly exhausted. Near-term action is needed for market continuity, but long-term action will provide market-certainty and attract investment. Thus, NYSERDA's NY-Sun program must be extended, especially targeted to projects that directly lower energy costs for low- to moderate-income households or projects that are beneficially sited to minimize land use impacts.



Thank you for the opportunity to provide input, and for your important work to protect New York's environment and cost-effectively increase clean energy supply.

Sincerely,

Daniel Montante
President, Montante Solar





January 28, 2025

Re: Kendall Sustainable Infrastructure, LLC Testimony to Joint Legislative Budget Hearing on Energy and Environmental Conservation Regarding the 2025-2026 Executive Budget

Dear Senator Kreuger and Assemblymember Pretlow,

I'm writing to you from Kendall Sustainable Infrastructure, LLC regarding the 2025-2026 executive budget.

Our company has managed approximately \$100M in investments into the NY Community Solar market over the last 5 years, and we hope to be able to double that in the coming years. We develop, own and operate sustainable infrastructure projects nationally. In NY State, our impacts have directly benefitted dozens of landowners and towns that have been starved for investment through the decades, and through our construction contacts we have employed hundreds of workers. We hope that this industry can continue to exist, with your support.

Increasing solar energy supply in New York can directly advance the Governor's Affordability Agenda by lowering electricity bills for homes and businesses across the state. However, **the 2025-2026 Executive Budget and the Governor's policy agenda outlined in her State-of-the-State address do not include any policies to advance cost-effective solar deployment in New York State.**

Rooftop and community solar ("distributed solar") is New York's most successful clean energy sector, and continues to have incredible momentum following a record-setting year for the state. It is also the sector that employs the most workers, with 15,490 employees based on NYSEIDA's 2024 jobs census. Despite our industry's momentum, we are facing major challenges that threaten New York's solar industry, companies like mine, and our skilled workforce. These challenges can be overcome with smart policy proposals, and I encourage you to consider the following proposals in the 2025-2026 budget.

Raising the state's distributed solar goal to 20 gigawatts by 2035 ("20x35") will further push New York to close the gap on its renewable energy targets while lowering energy costs for families and businesses. In June 2024, NYSEIA released [20 Gigawatts by 2035](#), a policy roadmap to accelerate distributed solar deployment in New York. Adopting the proposals in this roadmap will deliver \$50B in direct utility bill savings to families and businesses, lower the cost of electricity for all customers, and create 15,000 additional sustainable jobs in the solar industry.

Currently, community-scale solar projects face both siting and interconnection challenges, delaying the development of many solar projects throughout the state.

Community-scale projects are permitted by local governments, who are increasingly adopting restrictive local laws and moratoria in response to utility-scale projects and/or misinformation. An estimated 4.6 gigawatts of otherwise viable community solar projects are being blocked due to restrictive local laws. New York can easily replicate Illinois' model of siting reform, where the state streamlines local permitting by creating statewide standards for community solar while keeping project-specific zoning decisions at the local level. This approach simultaneously respects "home rule" while creating viable permitting pathways for community solar projects across the state.

At the beginning of this year, the DEC drastically expanded its jurisdiction over wetlands and surrounding areas, with the agency's jurisdiction set to expand further in the coming years. Protecting New York's ecological resources is important, but it must be balanced with the need to deploy renewable energy. The DEC does not yet have a general permit for solar projects, and until now the agency has enforced a de facto ban against solar on any land it regulates. This is causing community companies to cease all new solar development in the state, imperiling our clean energy progress and solar workforce. We urge the DEC to rapidly develop a general permit that allows solar on most sites where it would be permitted by the national standard—USACE's Nationwide Permit 51.

Regarding interconnection, New York solar and energy storage developers pay utilities to upgrade distribution systems in order to interconnect their projects to the grid, but the companies do not have any control over the work completed by the utility company, nor is there regulatory oversight on these utility costs. The cost to interconnect new projects has risen faster than inflation due to the utilities' inefficient designs, high overhead, and unchecked cost overruns. Better regulating utility interconnection costs and implementing a flexible interconnection program— where utilities actively manage distributed energy resources with smart grid technology rather than overbuilding traditional utility infrastructure— will lower interconnection costs and shorten the timeline to connect new projects.

Finally, the NY-Sun program is NYSERDA's most successful clean energy program, supporting solar projects across much of New York State with modest capacity-based incentives, which are nearly exhausted. Near-term action is needed for market continuity, but long-term action will provide market-certainty and attract investment. Thus, NYSERDA's NY-Sun program must be extended, especially targeted to projects that directly lower energy costs for low- to moderate-income households or projects that are beneficially sited to minimize land use impacts.

Thank you for the opportunity to provide input, and for your important work to protect New York's environment and cost-effectively increase clean energy supply.

Sincerely,



John Chaimanis
Co-Founder, Managing Director
Kendall Sustainable Infrastructure, LLC

January 27, 2025

Re: Community Power Partners Testimony to Joint Legislative Budget Hearing on Energy and Environmental Conservation Regarding the 2025-2026 Executive Budget

Dear Senator Kreuger and Assemblymember Pretlow,

I'm writing to you from Community Power Partners regarding the 2025-2026 executive budget.

White Plains, NY based Community Power Partners ("CPP") is a full service vertically integrated Renewable Energy Company. CPP is a leading Community Solar Customer Management and Aggregation Firm operating in New York since 2018. CPP actively brokers New York State VDER Value Stack Credits and Renewable Energy Credits, as well as developing Solar, Community Solar, Electric Vehicle Charging Stations and Standalone Battery Storage projects.

Increasing solar energy supply in New York can directly advance the Governor's Affordability Agenda by lowering electricity bills for homes and businesses across the state. However, the 2025-2026 Executive Budget and the Governor's policy agenda outlined in her State-of-the-State address do not include any policies to advance cost-effective solar deployment in New York State.

Rooftop and community solar ("distributed solar") is New York's most successful clean energy sector and continues to have incredible momentum following a record-setting year for the state. It is also the sector that employs the most workers, with 15,490 employees based on NYSEIDA's 2024 jobs census. Despite our industry's momentum, we are facing major challenges that threaten New York's solar industry, companies like mine, and our skilled workforce. These challenges can be overcome with smart policy proposals, and I encourage you to consider the following proposals in the 2025-2026 budget.

Raising the state's distributed solar goal to 20 gigawatts by 2035 ("20x35") will further push New York to close the gap on its renewable energy targets while lowering energy costs for families and businesses. In June 2024, NYSEIA released [20 Gigawatts by 2035](#), a policy roadmap to accelerate distributed solar deployment in New York. Adopting the proposals in this roadmap will deliver \$50B in direct utility bill savings to families and businesses, lower the cost of electricity for all customers, and create 15,000 additional sustainable jobs in the solar industry.

Currently, community-scale solar projects face both siting and interconnection challenges, delaying the development of many solar projects throughout the state.

Community-scale projects are permitted by local governments, who are increasingly adopting restrictive local laws and moratoria in response to utility-scale projects and/or misinformation. An estimated 4.6 gigawatts of otherwise viable community solar projects are being blocked due to restrictive local laws. New York can easily replicate Illinois' model of siting reform, where the state streamlines local permitting by creating statewide standards for community solar while keeping project-specific zoning decisions at the local level. This approach simultaneously respects "home rule" while creating viable permitting pathways for community solar projects across the state.

At the beginning of this year, the DEC drastically expanded its jurisdiction over wetlands and surrounding areas, with the agency's jurisdiction set to expand further in the coming years. Protecting New York's ecological resources is important, but it must be balanced with the need to deploy renewable energy. The DEC does not yet have a general permit for solar projects, and until now the agency has enforced a de facto ban against solar on any land it regulates. This is causing community companies to cease all new solar development in the state, imperiling our clean energy progress and solar workforce. We urge the DEC to rapidly develop a general permit that allows solar on most sites where it would be permitted by the national standard— USACE's Nationwide Permit 51.

Regarding interconnection, New York solar and energy storage developers pay utilities to upgrade distribution systems in order to interconnect their projects to the grid, but the companies do not have any control over the work completed by the utility company, nor is there regulatory oversight on these utility costs. The cost to

interconnect new projects has risen faster than inflation due to the utilities' inefficient designs, high overhead, and unchecked cost overruns. Better regulating utility interconnection costs and implementing a flexible interconnection program— where utilities actively manage distributed energy resources with smart grid technology rather than overbuilding traditional utility infrastructure— will lower interconnection costs and shorten the timeline to connect new projects.

Finally, the NY-Sun program is NYSERDA's most successful clean energy program, supporting solar projects across much of New York State with modest capacity-based incentives, which are nearly exhausted. Near-term action is needed for market continuity, but long-term action will provide market-certainty and attract investment. Thus, NYSERDA's NY-Sun program must be extended, especially targeted to projects that directly lower energy costs for low- to moderate-income households or projects that are beneficially sited to minimize land use impacts.

Thank you for the opportunity to provide input, and for your important work to protect New York's environment and cost-effectively increase clean energy supply.

Sincerely,

Michael Mollin

President

Community Power Partners



Michael Mollin

President

470 Mamaroneck Avenue, Suite 300 | White Plains, NY 10605

917-696-0861 | mmollin@communitypowerpartners.com | www.communitypowerpartners.com

Re: Empire Clean Energy Supply Testimony to Joint Legislative Budget Hearing on Energy and Environmental Conservation Regarding the 2025-2026 Executive Budget

Dear Senator Kreuger and Assemblymember Pretlow,

I'm writing to you from Empire Clean Energy Supply regarding the 2025-2026 executive budget. We are a local solar equipment distributor in Bohemia NY since 2004, providing solar equipment to the local solar installers.

Increasing solar energy supply in New York can directly advance the Governor's Affordability Agenda by lowering electricity bills for homes and businesses across the state. However, the 2025-2026 Executive Budget and the Governor's policy agenda outlined in her State-of-the-State address do not include any policies to advance cost-effective solar deployment in New York State.

Rooftop and community solar ("distributed solar") is New York's most successful clean energy sector, and continues to have incredible momentum following a record-setting year for the state. It is also the sector that employs the most workers, with 15,490 employees based on NYSEIDA's 2024 jobs census. Despite our industry's momentum, we are facing major challenges that threaten New York's solar industry, companies like mine, and our skilled workforce. These challenges can be overcome with smart policy proposals, and I encourage you to consider the following proposals in the 2025-2026 budget.

Raising the state's distributed solar goal to 20 gigawatts by 2035 ("20x35") will further push New York to close the gap on its renewable energy targets while lowering energy costs for families and businesses. In June 2024, NYSEIA released 20 Gigawatts by 2035, a policy roadmap to accelerate distributed solar deployment in New York. Adopting the proposals in this roadmap will deliver \$50B in direct utility bill savings to families and businesses, lower the cost of electricity for all customers, and create 15,000 additional sustainable jobs in the solar industry. The Governor expressed concerns about affordability in her State of the State address and Executive Budget proposal. Without urgent action, rising energy demands and inflation will cause energy costs to become an extreme financial burden on New Yorkers. Energy bills are already the third largest expense for New York households, with lower income households spending 10-20% of their income on energy alone.

Rooftop solar can be an affordable solution to this with the modernization of the residential solar tax credit. Legislators and a coalition of renewable energy, housing and environmental organizations have advocated to raise the per-household cap for New York's only statewide solar incentive and make the credit accessible to low-income homeowners and seniors. Thus, including S.2626 (Harckham) / A.1373 (Walker) in the final budget will make it more affordable for homeowners across the state to install rooftop solar panels.

Finally, the NY-Sun program is NYSEIDA's most successful clean energy program, supporting solar projects across much of New York State with modest capacity-based incentives, which are nearly exhausted. Near-term action is needed for market continuity, but long-term action will provide market-certainty and attract investment. Thus, NYSEIDA's NY-Sun program must be extended, especially targeted to projects that directly lower energy costs for low- to moderate-income households.

Thank you for the opportunity to provide input, and for your important work to protect New York's environment and cost-effectively increase clean energy supply.

Sincerely,

William L. Feldmann

CEO/President

Clean Energy of New York Inc.

dba Empire Clean Energy Supply

Board of Directors, Earth X

Former Chairman, LISSA

Founding Member, LIGEO & NYGEO

C.E.O.

Clean Energy of New York Inc. dba

Empire Clean Energy Supply

1520 Ocean Avenue

Bohemia, NY 11716

631-589-4340

Fax 631-589-4384



Please submit before 5PM Tuesday, January 28th, 2025

Send to: wamchair@nyassembly.gov AND financechair@nyenate.gov
Subject: New Energy Equity Testimony to Joint Legislative Budget Hearing on Energy and Environmental Conservation Regarding the 2025-2026 Executive Budget

January 28, 2025

Re: New Energy Equity Testimony to Joint Legislative Budget Hearing on Energy and Environmental Conservation Regarding the 2025-2026 Executive Budget

Dear Senator Kreuger and Assemblymember Pretlow,

I'm writing to you from New Energy Equity regarding the 2025-2026 executive budget.

Originally founded in Maryland 10 years ago, New Energy Equity now employs over 120 people with good paying jobs and delivers over \$250 million in energy projects every year. We have offices in Maryland, Minnesota, New York, and Colorado, with 10 employees at our office in Horseheads, NY. We have projects in many states, including dozens of them in New York that benefit family farms, municipalities, and schools. Our projects are located close to the load they serve, typically are sited on rooftops, carports, or on smaller parcels of 10-20 acres, and are much smaller than utility scale projects. This smaller size delivers benefits to the grid and electric ratepayers, but do not enjoy huge economies of scale. As such, we utilize tax incentives to ensure deployment of our systems.

Increasing solar energy supply in New York can directly advance the Governor's Affordability Agenda by lowering electricity bills for homes and businesses across the state. However, the 2025-2026 Executive Budget and the Governor's policy agenda outlined in her State-of-the-State address do not include any policies to advance cost-effective solar deployment in New York State.

Rooftop and community solar ("distributed solar") is New York's most successful clean energy sector, and continues to have incredible momentum following a record-setting year for the state. It is also the sector that employs the most workers, with 15,490 employees based on NYSERDA's 2024 jobs census. Despite our industry's momentum, we are facing major challenges that threaten New York's solar industry, companies like mine, and our skilled workforce. These challenges can be overcome with smart policy proposals, and I encourage you to consider the following proposals in the 2025-2026 budget.

Raising the state's distributed solar goal to 20 gigawatts by 2035 ("20x35") will further push New York to close the gap on its renewable energy targets while lowering energy costs for families and businesses. In June 2024, NYSEIA released [20 Gigawatts by 2035](#), a policy roadmap to

accelerate distributed solar deployment in New York. Adopting the proposals in this roadmap will deliver \$50B in direct utility bill savings to families and businesses, lower the cost of electricity for all customers, and create 15,000 additional sustainable jobs in the solar industry.

Currently, community-scale solar projects face both siting and interconnection challenges, delaying the development of many solar projects throughout the state.

Community-scale projects are permitted by local governments, who are increasingly adopting restrictive local laws and moratoria in response to utility-scale projects and/or misinformation. An estimated 4.6 gigawatts of otherwise viable community solar projects are being blocked due to restrictive local laws. New York can easily replicate Illinois' model of siting reform, where the state streamlines local permitting by creating statewide standards for community solar while keeping project-specific zoning decisions at the local level. This approach simultaneously respects "home rule" while creating viable permitting pathways for community solar projects across the state.

At the beginning of this year, the DEC drastically expanded its jurisdiction over wetlands and surrounding areas, with the agency's jurisdiction set to expand further in the coming years. Protecting New York's ecological resources is important, but it must be balanced with the need to deploy renewable energy. The DEC does not yet have a general permit for solar projects, and until now the agency has enforced a de facto ban against solar on any land it regulates. This is causing community companies to cease all new solar development in the state, imperiling our clean energy progress and solar workforce. We urge the DEC to rapidly develop a general permit that allows solar on most sites where it would be permitted by the national standard—USACE's Nationwide Permit 51.

Regarding interconnection, New York solar and energy storage developers pay utilities to upgrade distribution systems in order to interconnect their projects to the grid, but the companies do not have any control over the work completed by the utility company, nor is there regulatory oversight on these utility costs. The cost to interconnect new projects has risen faster than inflation due to the utilities' inefficient designs, high overhead, and unchecked cost overruns. Better regulating utility interconnection costs and implementing a flexible interconnection program—where utilities actively manage distributed energy resources with smart grid technology rather than overbuilding traditional utility infrastructure—will lower interconnection costs and shorten the timeline to connect new projects.

Finally, the NY-Sun program is NYSERDA's most successful clean energy program, supporting solar projects across much of New York State with modest capacity-based incentives, which are nearly exhausted. Near-term action is needed for market continuity, but long-term action will provide market-certainty and attract investment. Thus, NYSERDA's NY-Sun program must be extended, especially targeted to projects that directly lower energy costs for low- to moderate-income households or projects that are beneficially sited to minimize land use impacts.

Thank you for the opportunity to provide input, and for your important work to protect New York's environment and cost-effectively increase clean energy supply.

Sincerely,

Brandon Henke-Fiedler

Community Solar Market and Policy Analyst

New Energy Equity





VIA EMAIL

January 28, 2025

wamchair@nyassembly.gov

financechair@nysenate.gov

Re: CleanCapital Testimony to Joint Legislative Budget Hearing on Energy and Environmental Conservation Regarding the 2025-2026 Executive Budget

Dear Senator Kreuger and Assemblymember Pretlow,

CleanCapital is a diversified clean energy company headquartered in New York City, with offices throughout the state, focused on strategic investments in the full lifecycle of solar and energy storage projects. Mission-driven to mitigate the climate crisis, CleanCapital leads the energy transition with strategic investments in early-stage, new construction, and operating renewables projects and development partners. To date, the company has invested over \$1 billion in projects and companies, including the acquisition of BQ Energy, a national leader in landfill and brownfield renewable energy development, managing an operating portfolio of more than 200 projects totaling more than 340 MW and a pipeline totaling well over 2 GW. CleanCapital appreciates the opportunity to offer testimony regarding the 2025-2026 executive budget.

Expanding the supply of solar energy in New York could greatly support the Governor's Affordability Agenda by helping to lower electricity bills for both homes and businesses across the state. However, the 2025-2026 Executive Budget and the Governor's policy agenda, as outlined in her State-of-the-State address, currently do not include specific policies to promote cost-effective solar deployment in New York.

Rooftop and community solar ("distributed solar") is New York's most successful clean energy sector, and continues to have incredible momentum following a record-setting year for the state. It is also the sector that employs the most workers, with 15,490 employees based on NYSEDA's 2024 jobs census. Despite our industry's momentum, we are facing major challenges that threaten New York's solar industry, companies like mine, and our skilled workforce. These challenges can be overcome with smart policy proposals, and I encourage you to consider the following proposals in the 2025-2026 budget.

Raising the state's distributed solar goal to 20 gigawatts by 2035 ("20x35") will further push New York to close the gap on its renewable energy targets while lowering energy costs for families and businesses. In June 2024, NYSEIA released [20 Gigawatts by 2035](#), a policy roadmap to accelerate distributed solar deployment in New York. Adopting the proposals in this roadmap will deliver \$50B in direct utility bill savings to families and businesses, lower the cost of electricity for all customers, and create 15,000 additional sustainable jobs in the solar industry.

Currently, community-scale solar projects face both siting and interconnection challenges, delaying the development of many solar projects throughout the state.

Community-scale projects are permitted by local governments, who are increasingly adopting restrictive local laws and moratoria in response to utility-scale projects and/or misinformation. An estimated 4.6 gigawatts of otherwise viable community solar projects are being blocked due to restrictive local laws. New York can easily replicate Illinois' model of siting reform, where the state streamlines local permitting by creating statewide standards for community solar while keeping project-specific zoning decisions at the local level. This approach simultaneously respects "home rule" while creating viable permitting pathways for community solar projects across the state.

At the beginning of this year, the DEC drastically expanded its jurisdiction over wetlands and surrounding areas, with the agency's jurisdiction set to expand further in the coming years. Protecting New York's ecological resources is important, but it must be balanced with the need to deploy renewable energy. The DEC does not yet have a general permit for solar projects, and until now the agency has enforced a de facto ban against solar on any land it regulates. We urge the DEC to rapidly develop a general permit that allows solar on most sites where it would be permitted by the national standard— USACE's Nationwide Permit 51.

Regarding interconnection, New York solar and energy storage developers pay utilities to upgrade distribution systems in order to interconnect their projects to the grid, but the companies do not have any control over the work completed by the utility company, nor is there regulatory oversight on these utility costs. The cost to interconnect new projects has risen faster than inflation due to the utilities' inefficient designs, high overhead, and unchecked cost overruns. Better regulating utility interconnection costs and implementing a flexible interconnection program— where utilities actively manage distributed energy resources with smart grid technology rather than overbuilding traditional utility infrastructure— will lower interconnection costs and shorten the timeline to connect new projects.



Finally, the NY-Sun program is NYSERDA's most successful clean energy program, supporting solar projects across much of New York State with modest capacity-based incentives, which are nearly exhausted. Companies like CleanCapital rely on long-term market certainty to make strategic investments in the state, and while near-term action is necessary for market continuity, long-term solutions are essential to provide the predictability needed to attract ongoing investment. Therefore, it is important that NYSERDA's NY-Sun program be extended, with a particular focus on projects that help lower energy costs for low- to moderate-income households or those that are strategically sited to minimize land use impacts.

Thank you for the opportunity to provide input, and for your important work to protect New York's environment and cost-effectively increase clean energy supply.

Sincerely,

A handwritten signature in black ink, appearing to read "T.M.", written in a cursive style.

Twiggy Mendenhall,
Policy Associate
CleanCapital



January 28, 2025

Re: Pfister Energy Testimony to Joint Legislative Budget Hearing on Energy and Environmental Conservation Regarding the 2025-2026 Executive Budget

Dear Senator Kreuger and Assemblymember Pretlow,

I'm writing to you from Pfister Energy regarding the 2025-2026 executive budget.

Pfister Energy Inc., a corporation established in 2005 with over 90 employees, has been providing turnkey solar and renewable energy solutions for two decades and installed over 700MW of solar to date. Pfister Energy is an active player in the NY energy market and has installed solar for small businesses, school districts, and major corporations; most notably completing 9 groundmounted systems totalling over 50MW.

Increasing solar energy supply in New York can directly advance the Governor's Affordability Agenda by lowering electricity bills for homes and businesses across the state. However, the 2025-2026 Executive Budget and the Governor's policy agenda outlined in her State-of-the-State address do not include any policies to advance cost-effective solar deployment in New York State.

Rooftop and community solar ("distributed solar") is New York's most successful clean energy sector, and continues to have incredible momentum following a record-setting year for the state. It is also the sector that employs the most workers, with 15,490 employees based on NYSEIDA's 2024 jobs census. Despite our industry's momentum, we are facing major challenges that threaten New York's solar industry, companies like mine, and our skilled workforce. These challenges can be overcome with smart policy proposals, and I encourage you to consider the following proposals in the 2025-2026 budget.

Raising the state's distributed solar goal to 20 gigawatts by 2035 ("20x35") will further push New York to close the gap on its renewable energy targets while lowering energy costs for families and businesses. In June 2024, NYSEIA released [20 Gigawatts by 2035](#), a policy roadmap to accelerate distributed solar deployment in New York. Adopting the proposals in this roadmap will deliver \$50B in direct utility bill savings to families and businesses, lower the cost of electricity for all customers, and create 15,000 additional sustainable jobs in the solar industry.

Currently, community-scale solar projects face both siting and interconnection challenges, delaying the development of many solar projects throughout the state.

Community-scale projects are permitted by local governments, who are increasingly adopting restrictive local laws and moratoria in response to utility-scale projects and/or misinformation.

An estimated 4.6 gigawatts of otherwise viable community solar projects are being blocked due to restrictive local laws. New York can easily replicate Illinois' model of siting reform, where the state streamlines local permitting by creating statewide standards for community solar while keeping project-specific zoning decisions at the local level. This approach simultaneously respects "home rule" while creating viable permitting pathways for community solar projects across the state.

At the beginning of this year, the DEC drastically expanded its jurisdiction over wetlands and surrounding areas, with the agency's jurisdiction set to expand further in the coming years. Protecting New York's ecological resources is important, but it must be balanced with the need to deploy renewable energy. The DEC does not yet have a general permit for solar projects, and until now the agency has enforced a de facto ban against solar on any land it regulates. This is causing community companies to cease all new solar development in the state, imperiling our clean energy progress and solar workforce. We urge the DEC to rapidly develop a general permit that allows solar on most sites where it would be permitted by the national standard—USACE's Nationwide Permit 51.

Regarding interconnection, New York solar and energy storage developers pay utilities to upgrade distribution systems in order to interconnect their projects to the grid, but the companies do not have any control over the work completed by the utility company, nor is there regulatory oversight on these utility costs. The cost to interconnect new projects has risen faster than inflation due to the utilities' inefficient designs, high overhead, and unchecked cost overruns. Better regulating utility interconnection costs and implementing a flexible interconnection program—where utilities actively manage distributed energy resources with smart grid technology rather than overbuilding traditional utility infrastructure—will lower interconnection costs and shorten the timeline to connect new projects.

Finally, the NY-Sun program is NYSERDA's most successful clean energy program, supporting solar projects across much of New York State with modest capacity-based incentives, which are nearly exhausted. Near-term action is needed for market continuity, but long-term action will provide market-certainty and attract investment. Thus, NYSERDA's NY-Sun program must be extended, especially targeted to projects that directly lower energy costs for low- to moderate-income households or projects that are beneficially sited to minimize land use impacts.

Thank you for the opportunity to provide input, and for your important work to protect New York's environment and cost-effectively increase clean energy supply.

Sincerely,

Aliyah Elfar
Associate Project Developer
Pfister Energy





January 28th, 2025

Solar Liberty Testimony to Joint Legislative Budget Hearing on Energy and Environmental Conservation Regarding the 2025-2026 Executive Budget

Dear Senator Kreuger and Assemblymember Pretlow:

I'm writing to you from Solar Liberty regarding the 2025-2026 executive budget.

Solar Liberty is a turnkey solar energy developer and installer, which means we handle all aspects of solar electric installations from concept through ownership. Since our inception in 2003, Solar Liberty has been continually expanding and reinvesting in New York State. The sole focus for our 47 employees is on solar energy. Our business model of in-house engineering, full-time solar crews, and strict attention to detail leverages innovation and solar industry expertise to install, own, operate and maintain PV systems, with lower costs and more value-added services than our competition.

Increasing solar energy supply in New York can directly advance the Governor's Affordability Agenda by lowering electricity bills for homes and businesses across the state. However, the 2025-2026 Executive Budget and the Governor's policy agenda outlined in her State-of-the-State address do not include any policies to advance cost-effective solar deployment in New York State.

Rooftop and community solar ("distributed solar") is New York's most successful clean energy sector, and continues to have incredible momentum following a record-setting year for the state. It is also the sector that employs the most workers, with 15,490 employees based on NYSEIDA's 2024 jobs census. Despite our industry's momentum, we are facing major challenges that threaten New York's solar industry, companies like mine, and our skilled workforce. These challenges can be overcome with smart policy proposals, and I encourage you to consider the following proposals in the 2025-2026 budget.

Raising the state's distributed solar goal to 20 gigawatts by 2035 ("20x35") will further push New York to close the gap on its renewable energy targets while lowering energy costs for families and businesses. In June 2024, NYSEIA released [20 Gigawatts by 2035](#), a policy roadmap to accelerate distributed solar deployment in New York. Adopting the proposals in this roadmap will deliver \$50B in direct utility bill savings to families and businesses, lower the cost of electricity for all customers, and create 15,000 additional sustainable jobs in the solar industry.

The Governor expressed concerns about affordability in her State of the State address and Executive Budget proposal. Without urgent action, rising energy demands and inflation will cause energy costs to become an extreme financial burden on New Yorkers. Energy bills are already the third largest expense for New York households, with lower income households spending 10-20% of their income on energy alone.

Rooftop solar can be an affordable solution to this with the modernization of the residential solar tax credit. [Legislators and a coalition of renewable energy, housing and environmental organizations have advocated to raise the per-household cap for New York's only statewide solar incentive and make the credit accessible to low-income homeowners and seniors.](#) Thus, including [S.2626 \(Harckham\) / A.1373 \(Walker\)](#) in the final budget will make it more affordable for homeowners across the state to install rooftop solar panels.

Finally, the NY-Sun program is NYSEIDA's most successful clean energy program, supporting solar projects across much of New York State with modest capacity-based incentives, which are nearly exhausted. Near-term action is needed for market continuity, but long-term action will provide market-certainty and attract investment. Thus, NYSEIDA's NY-Sun

program must be extended, especially targeted to projects that directly lower energy costs for low- to moderate-income households.

Thank you for the opportunity to provide input, and for your important work to protect New York's environment and cost-effectively increase clean energy supply.

Very truly yours,

Adam K. Rizzo

Adam K. Rizzo | President

[866.807.3639 ext. 101](tel:866.807.3639) | adam.rizzo@solarliberty.com



[Facebook](#) | [Instagram](#) | [Twitter](#) | [LinkedIn](#) | [YouTube](#)

[SunProfit Referral Program](#) - Earn \$250 per referral

Dear Senator Kreuger and Assemblymember Pretlow,

I'm writing to you from EmPower Solar regarding the 2025-2026 executive budget.

EmPower Solar has been in business for nearly 20 years and on average employs over 100 employees on Long Island, New York

Increasing solar energy supply in New York can directly advance the Governor's Affordability Agenda by lowering electricity bills for homes and businesses across the state. However, the 2025-2026 Executive Budget and the Governor's policy agenda outlined in her State-of-the-State address do not include any policies to advance cost-effective solar deployment in New York State.

Rooftop and community solar ("distributed solar") is New York's most successful clean energy sector, and continues to have incredible momentum following a record-setting year for the state. It is also the sector that employs the most workers, with 15,490 employees based on NYSEERDA's 2024 jobs census. Despite our industry's momentum, we are facing major challenges that threaten New York's solar industry, companies like mine, and our skilled workforce. These challenges can be overcome with smart policy proposals, and I encourage you to consider the following proposals in the 2025-2026 budget.

Raising the state's distributed solar goal to 20 gigawatts by 2035 ("20x35") will further push New York to close the gap on its renewable energy targets while lowering energy costs for families and businesses. In June 2024, NYSEIA released [20 Gigawatts by 2035](#), a policy roadmap to accelerate distributed solar deployment in New York. Adopting the proposals in this roadmap will deliver \$50B in direct utility bill savings to families and businesses, lower the cost of electricity for all customers, and create 15,000 additional sustainable jobs in the solar industry.

The Governor expressed concerns about affordability in her State of the State address and Executive Budget proposal. Without urgent action, rising energy demands and inflation will cause energy costs to become an extreme financial burden on New Yorkers. Energy bills are already the third largest expense for New York households, with lower income households spending 10-20% of their income on energy alone.

Rooftop solar can be an affordable solution to this with the modernization of the residential solar tax credit. [Legislators and a coalition of renewable energy, housing and environmental organizations have advocated to raise the per-household cap for New York's only statewide solar incentive and make the credit accessible to low-income homeowners and seniors.](#) Thus, including [S.2626 \(Harckham\)](#) / [A.1373 \(Walker\)](#) in the final budget will make it more affordable for homeowners across the state to install rooftop solar panels.

Finally, the NY-Sun program is NYSEERDA's most successful clean energy program, supporting solar projects across much of New York State with modest capacity-based incentives, which are nearly exhausted. Near-term action is needed for market continuity, but long-term action will provide market-certainty and attract investment. Thus, NYSEERDA's NY-Sun program must be

extended, especially targeted to projects that directly lower energy costs for low- to moderate-income households.

Thank you for the opportunity to provide input, and for your important work to protect New York's environment and cost-effectively increase clean energy supply.

Sincerely,

Gregory



January 28, 2025

Re: NineDot Energy Testimony to Joint Legislative Budget Hearing on Energy and Environmental Conservation Regarding the 2025-2026 Executive Budget

Dear Senator Kreuger and Assemblymember Pretlow,

I'm writing to you from NineDot Energy, LLC (NineDot) regarding the 2025-2026 executive budget.

NineDot is a leading clean energy developer with a focus on energy storage in New York City. NineDot is creating innovative energy solutions that support a more resilient electric grid, deliver economic benefits, and reduce carbon emissions. We are on track to develop, build and operate more than 400 megawatts (MW) of clean energy systems by the end of 2026.

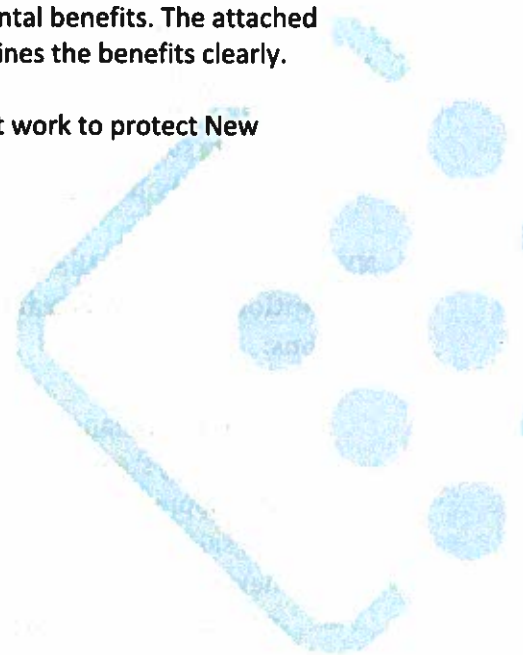
Increasing storage in New York can directly advance the Governor's Affordability Agenda by lowering electricity bills for homes and businesses across the state. However, the 2025-2026 Executive Budget and the Governor's policy agenda outlined in her State-of-the-State address do not include any policies to advance cost-effective energy storage deployment in New York State. We urge you to consider including sales tax exemption for commercial battery energy storage in the 2025-2026 budget.

Granting a sales tax exemption for commercial BESS would accelerate the pace of energy storage deployment, save ratepayer money, and deliver health and environmental benefits. The attached letter from NY-BEST to the Governor, sent on December 16, 2024, outlines the benefits clearly.

Thank you for the opportunity to provide input, and for your important work to protect New York's environment and cost-effectively increase clean energy supply.

Sincerely,

Lindsay Cherry
Director of Regulatory Affairs
NineDot Energy, LLC
lindsay@nine.energy



December 16, 2024



The Honorable Kathy Hochul, Governor
State of New York, Executive Chamber
Albany, NY 12224

Re: FY2026 Executive Budget - Sales Tax Exemption for Commercial Energy Storage

Dear Governor Hochul:

The New York Battery and Energy Storage Technology Consortium (NY-BEST), along with the undersigned organizations, write to respectfully request that you **include a Sales Tax Exemption for commercial energy storage in your FY2026 Executive Budget**. A Sales Tax Exemption will reduce reliance on discretionary Exemptions and drive down overall energy storage project costs, **reducing costs to ratepayers** of the NYSERDA energy storage incentive program and **supporting a more affordable clean energy transition**.

Given the shifting federal landscape, there is widespread concern about whether the nation will be able to effectively mitigate and appropriately respond to the catastrophic impacts of climate change. Now more than ever it is critical for New York State to take the lead on climate action and double down on our clean energy goals.

As Governor, you have recognized the critical need for energy storage on the electric grid and importantly, you directed the establishment of a new Roadmap for Energy Storage to increase the State's energy storage goal from 3 GW to 6 GW by 2030. A Sales Tax Exemption for energy storage would enact an important complementary policy to cost-effectively achieve this increased target.

NY-BEST, along with the undersigned organizations, urges you to include a Sales Tax Exemption for commercial energy storage systems in the Executive Budget for the following reasons:

1. **Reducing reliance on discretionary abatements.** Currently, most commercial battery energy storage systems (BESS) receive discretionary Sales Tax Exemptions from Industrial Development Authorities (IDAs) or other local entities, meaning the State does not receive the sales tax revenue. According to a December 2024 NY-BEST survey of 10 active BESS developer companies, of 181 MW of completed BESS projects in New York State, 58% of projects (by MW) have received a discretionary Sales Tax Exemption to date. Of 932 MW of

BESS projects anticipated in the next two years, 83% have either already received or are applying for a discretionary Sales Tax Exemption. However, achieving the discretionary abatement is a time- and resource-intensive process for both the developer and the IDA, providing significantly less benefit than an as-of-right exemption. On average, projects that have received a discretionary Sales Tax Exemption to date avoided approximately \$150,500 in sales tax per MW. However, the average total cost of obtaining the discretionary exemption ranged between \$40,000 and \$100,000 per MW, including the IDA project fee, IDA counsel, developer internal costs, and third party legal fees. *As a result, between 25-60% of the discretionary Exemption benefit was captured neither by developers nor by the State.* Further, the length of the IDA inducement process to achieve the discretionary Exemption most frequently ranged between 6 and 18 months—slowing down progress toward the State’s energy transition targets.

2. Minimally impacting State revenue. A commercial energy storage Sales Tax Exemption would result in minimal foregone State revenue. Given the nascent state of the storage industry, sales tax revenues from storage equipment have not been a meaningful part of State budgets to date. Further, any potential revenue is likely to ultimately be foregone via discretionary award processes, as the majority of projects to date have not paid sales tax, and the cost of achieving a discretionary Sales Tax Exemption does not accrue to the State.
3. Reducing costs to ratepayers. The commercial energy storage incentive program outlined in the 6 GW Energy Storage Roadmap and approved by the Public Service Commission in June 2024 is being funded by ratepayers. Providing an as-of-right Sales Tax Exemption for commercial energy storage systems will directly reduce project costs, allowing incentive dollars to be spread across more projects, thereby driving down the cost of the NYSERDA incentive program overall.
4. Aligning with Climate Act and environmental justice goals. New York State already offers a Sales Tax Exemption for a range of energy technologies, including fossil generators, solar panels, fuel cells, and residential energy storage systems. However, commercial energy storage systems, which will be essential to meeting the State’s 70% renewable by 2030 target and greenhouse gas emissions reduction targets, are not eligible. It no longer makes sense to provide tax exemptions to fossil generators and not energy storage. Commercial energy storage systems can help reduce energy system costs, create green jobs, increase grid reliability, and improve air quality and public health, particularly in Disadvantaged Communities. Indeed, in New York City alone, replacing the City’s peaker plants with energy storage, wind and solar would result in estimated savings of \$1 billion in avoided health impacts and an additional \$1 billion in avoided energy system costs by 2035.¹ A Sales Tax Exemption will help incentivize this critical technology.

¹ "Accelerate Now! The Fossil Fuel End Game 2.0", PEAK Coalition, 2024.

For the reasons listed above, we strongly encourage inclusion of a sales tax exemption for energy storage in the FY2026 Executive Budget. Please let us know how we can be helpful to you on this and any other issues.

We appreciate your consideration of this important request.

Sincerely,

Dr. William Acker
Executive Director
NY-BEST



Marguerite Wells
Executive Director
Alliance for Clean Energy New York



Kristina Persaud
Senior Policy Principal
Advanced Energy United



Moira Cyphers
Director, Atlantic Offshore & Eastern Region State Affairs
American Clean Power



Elizabeth (Betta) Broad
Campaign Director
New Yorkers for Clean Power



Julie Tighe
Executive Director
New York League of Conservation Voters



Josh Berman
Senior Attorney
Sierra Club



Christopher Casey
Utility Regulatory Director, New York
Natural Resources Defense Council



Vincent Albanese
Executive Director & Treasurer
New York State Laborers' Organizing Fund



Eric Walker
Policy Manager for Energy Justice
WE ACT for Environmental Justice



Karla Sosa
Project Manager, New York - New Jersey State Affairs
Environmental Defense Fund



Eddie Bautista
Executive Director
NYC Environmental Justice Alliance



Barbara Alicea
Executive Director
The Point CDC



Seth Mullendore
Executive Director
Clean Energy Group



Adam Flint
Executive Director
Network for a Sustainable Tomorrow



Gavin J. Donohue
President & CEO
Independent Power Producers of New York, Inc.



Caroline Chen
Director, Environmental Justice
New York Lawyers for the Public Interest



Vanessa Fajans-Turner
Executive Director
Environmental Advocates New York





January 27, 2025

Re: Distributed Sun LLC Testimony to Joint Legislative Budget Hearing on Energy and Environmental Conservation Regarding the 2025-2026 Executive Budget

Dear Senator Kreuger and Assemblymember Pretlow,

I'm writing to you from Distributed Sun LLC regarding the 2025-2026 executive budget.

Distributed Sun LLC developed remote metering projects in NY prior to community solar, over 100 MW of community solar in the state, and is now actively developing a 100 MW utility-scale projects in NYISO territory.

Increasing solar energy supply in New York can directly advance the Governor's Affordability Agenda by lowering electricity bills for homes and businesses across the state. However, the 2025-2026 Executive Budget and the Governor's policy agenda outlined in her State-of-the-State address do not include any policies to advance cost-effective solar deployment in New York State.

Rooftop and community solar ("distributed solar") is New York's most successful clean energy sector and continues to have incredible momentum following a record-setting year for the state. It is also the sector that employs the most workers, with 15,490 employees based on NYSEIDA's 2024 jobs census. Despite our industry's momentum, we are facing major challenges that threaten New York's solar industry, companies like mine, and our skilled workforce. These challenges can be overcome with smart policy proposals, and I encourage you to consider the following proposals in the 2025-2026 budget.

Raising the state's distributed solar goal to 20 gigawatts by 2035 ("20x35") will further push New York to close the gap on its renewable energy targets while lowering energy costs for families and businesses. In June 2024, NYSEIA released [20 Gigawatts by 2035](#), a policy roadmap to accelerate distributed solar deployment in New York. Adopting the proposals in this roadmap will deliver \$50B in direct utility bill savings to families and businesses, lower the cost of electricity for all customers, and create 15,000 additional sustainable jobs in the solar industry.

Currently, community-scale solar projects face both siting and interconnection challenges, delaying the development of many solar projects throughout the state.

Community-scale projects are permitted by local governments, who are increasingly adopting restrictive local laws and moratoria in response to utility-scale projects and/or misinformation. An estimated 4.6 gigawatts of otherwise viable community solar projects are being blocked due



to restrictive local laws. New York can easily replicate Illinois' model of siting reform, where the state streamlines local permitting by creating statewide standards for community solar while keeping project-specific zoning decisions at the local level. This approach simultaneously respects "home rule" while creating viable permitting pathways for community solar projects across the state.

At the beginning of this year, the DEC drastically expanded its jurisdiction over wetlands and surrounding areas, with the agency's jurisdiction set to expand further in the coming years. Protecting New York's ecological resources is important, but it must be balanced with the need to deploy renewable energy. The DEC does not yet have a general permit for solar projects, and until now the agency has enforced a de facto ban against solar on any land it regulates. This is causing community companies to cease all new solar development in the state, imperiling our clean energy progress and solar workforce. We urge the DEC to rapidly develop a general permit that allows solar on most sites where it would be permitted by the national standard— USACE's Nationwide Permit 51.

Regarding interconnection, New York solar and energy storage developers pay utilities to upgrade distribution systems in order to interconnect their projects to the grid, but the companies do not have any control over the work completed by the utility company, nor is there regulatory oversight on these utility costs. The cost to interconnect new projects has risen faster than inflation due to the utilities' inefficient designs, high overhead, and unchecked cost overruns. Better regulating utility interconnection costs and implementing a flexible interconnection program— where utilities actively manage distributed energy resources with smart grid technology rather than overbuilding traditional utility infrastructure— will lower interconnection costs and shorten the timeline to connect new projects.

Finally, the NY-Sun program is NYSERDA's most successful clean energy program, supporting solar projects across much of New York State with modest capacity-based incentives, which are nearly exhausted. Near-term action is needed for market continuity, but long-term action will provide market-certainty and attract investment. Thus, NYSERDA's NY-Sun program must be extended, especially targeted to projects that directly lower energy costs for low- to moderate-income households or projects that are beneficially sited to minimize land use impacts.

Thank you for the opportunity to provide input, and for your important work to protect New York's environment and cost-effectively increase clean energy supply.

Sincerely,

Ed Scarborough
VP, Government & Regulatory Affairs
Distributed Sun LLC
Edward.S@DistributedSun.com





January 28, 2025

Re: New Leaf Energy Testimony to Joint Legislative Budget Hearing on Energy and Environmental Conservation Regarding the 2025-2026 Executive Budget

Dear Senator Kreuger and Assemblymember Pretlow,

I'm writing to you from New Leaf Energy regarding the 2025-2026 executive budget.

New Leaf Energy (formerly an arm of Borrego Solar Systems) is a solar and storage developer specializing in distribution generation and utility scale projects across the United States. New Leaf advocates for improved interconnection processes and policies that enable renewable energy development and has expertise and interest in forwarding proactive system planning for infrastructure that will integrate distributed generation and the role of flexible interconnection in that process. New Leaf is an active participant at the IPWG and ITWG and a NYSEIA member.

Increasing solar energy supply in New York can directly advance the Governor's Affordability Agenda by lowering electricity bills for homes and businesses across the state. However, the 2025-2026 Executive Budget and the Governor's policy agenda outlined in her State-of-the-State address do not include any policies to advance cost-effective solar deployment in New York State.

Rooftop and community solar ("distributed solar") is New York's most successful clean energy sector, and continues to have incredible momentum following a record-setting year for the state. It is also the sector that employs the most workers, with 15,490 employees based on NYSERDA's 2024 jobs census. Despite our industry's momentum, we are facing major challenges that threaten New York's solar industry, companies like mine, and our skilled workforce. These challenges can be overcome with smart policy proposals, and I encourage you to consider the following proposals in the 2025-2026 budget.

Raising the state's distributed solar goal to 20 gigawatts by 2035 ("20x35") will further push New York to close the gap on its renewable energy targets while lowering energy costs for families and businesses. In June 2024, NYSEIA released [20 Gigawatts by 2035](#), a policy roadmap to accelerate distributed solar deployment in New York. Adopting the proposals in this roadmap will deliver \$50B in direct utility bill savings to families and businesses, lower the cost of electricity for all customers, and create 15,000 additional sustainable jobs in the solar industry.

Currently, community-scale solar projects face both siting and interconnection challenges, delaying the development of many solar projects throughout the state.

Community-scale projects are permitted by local governments, who are increasingly adopting restrictive local laws and moratoria in response to utility-scale projects and/or misinformation. An



estimated 4.6 gigawatts of otherwise viable community solar projects are being blocked due to restrictive local laws. New York can easily replicate Illinois' model of siting reform, where the state streamlines local permitting by creating statewide standards for community solar while keeping project-specific zoning decisions at the local level. This approach simultaneously respects "home rule" while creating viable permitting pathways for community solar projects across the state.

At the beginning of this year, the DEC drastically expanded its jurisdiction over wetlands and surrounding areas, with the agency's jurisdiction set to expand further in the coming years. Protecting New York's ecological resources is important, but it must be balanced with the need to deploy renewable energy. The DEC does not yet have a general permit for solar projects. This is causing community companies to reconsider all new solar development in the state. Overly restrictive DEC requirements would imperil our clean energy progress and solar workforce. We urge the DEC to rapidly develop a general permit that allows solar on most sites where it would be permitted by the national standard— USACE's Nationwide Permit 51.

Regarding interconnection, New York solar and energy storage developers pay utilities to upgrade distribution systems in order to interconnect their projects to the grid, but the companies do not have any control over the work completed by the utility company, nor is there regulatory oversight on these utility costs. The cost to interconnect new projects has risen faster than inflation due to the inefficient and reactive designs, high overhead, and unchecked cost overruns. Better regulating utility interconnection costs and implementing a flexible interconnection program— where utilities actively manage distributed energy resources with smart grid technology rather than overbuilding traditional utility infrastructure— will lower interconnection costs and shorten the timeline to connect new projects.

Finally, the NY-Sun program is NYSERDA's most successful clean energy program, supporting solar projects across much of New York State with modest capacity-based incentives, which are nearly exhausted. Near-term action is needed for market continuity, but long-term action will provide market-certainty and attract investment. Thus, NYSERDA's NY-Sun program must be extended, especially targeted to projects that directly lower energy costs for low- to moderate-income households or projects that are beneficially sited to minimize land use impacts.

Thank you for the opportunity to provide input, and for your important work to protect New York's environment and cost-effectively increase clean energy supply.

Sincerely,

Kate Tohme
Director of Interconnection Policy
New Leaf Energy

January 28, 2025

Re: Solar One Testimony to Joint Legislative Budget Hearing on Energy and Environmental Conservation Regarding the 2025-2026 Executive Budget

Dear Senator Kreuger and Assemblymember Pretlow,

I'm writing to you from Solar One regarding the 2025-2026 executive budget.

Solar One is a New York nonprofit organization whose mission is to design and deliver innovative education, training, and technical assistance that fosters sustainability and resiliency in diverse urban environments. We provide comprehensive solar technical assistance to homeowners, affordable housing providers, renters, and community organizations to facilitate high-impact solar projects. We have completed pre-development for over 1000 solar projects in New York City, primarily affordable housing projects and community solar projects serving low-to-moderate-income residents.

Increasing solar energy supply in New York can directly advance the Governor's Affordability Agenda by lowering electricity bills for homes and businesses across the state. However, the 2025-2026 Executive Budget and the Governor's policy agenda outlined in her State-of-the-State address do not include any policies to advance cost-effective solar deployment in New York State.

Rooftop and community solar ("distributed solar") is New York's most successful clean energy sector, and continues to have incredible momentum following a record-setting year for the state. It is also the sector that employs the most workers, with 15,490 employees based on NYSERDA's 2024 jobs census. Despite our industry's momentum, we are facing major challenges that threaten New York's solar industry, companies like mine, and our skilled workforce. These challenges can be overcome with smart policy proposals, and I encourage you to consider the following proposals in the 2025-2026 budget.

The Governor expressed concerns about affordability in her State of the State address and Executive Budget proposal. Without urgent action, rising energy demands and inflation will cause energy costs to become an extreme financial burden on New Yorkers. Energy bills are already the third largest expense for New York households, with lower income households spending 10-20% of their income on energy alone.

Rooftop solar can be an affordable solution to this with the modernization of the residential solar tax credit. [Legislators and a coalition of renewable energy, housing and environmental organizations have advocated to raise the per-household cap for New York's only statewide solar incentive and make the credit accessible to low-income homeowners and seniors.](#) Thus, including [S.2626 \(Harckham\) / A.1373 \(Walker\)](#) in the final budget will make it more affordable for homeowners across the state to install rooftop solar panels.

Additionally, raising the state's distributed solar goal to 20 gigawatts by 2035 ("20x35") will further push New York to close the gap on its renewable energy targets while lowering energy costs for families and businesses. In June 2024, NYSEIA released [20 Gigawatts by 2035](#), a policy roadmap to accelerate distributed solar deployment in New York.

Adopting the proposals in this roadmap will deliver \$50B in direct utility bill savings to families and businesses, lower the cost of electricity for all customers, and create 15,000 additional sustainable jobs in the solar industry.

Finally, the NY-Sun program is NYSERDA's most successful clean energy program, supporting solar projects across much of New York State with modest capacity-based incentives, which are nearly exhausted. Near-term action is needed for market continuity, but long-term action will provide market-certainty and attract investment. Thus, NYSERDA's NY-Sun program must be extended, especially targeted to projects that directly lower energy costs for low- to moderate-income households.

Thank you for the opportunity to provide input, and for your important work to protect New York's environment and cost-effectively increase clean energy supply.

Sincerely,

A handwritten signature in black ink, appearing to read 'Anika Wistar-Jones', written in a cursive style.

Anika Wistar-Jones
Managing Director
Solar One



January 28, 2025

Re: Sunkeeper Solar Electric LLC Testimony to Joint Legislative Budget Hearing on Energy and Environmental Conservation Regarding the 2025-2026 Executive Budget

Dear Senator Kreuger and Assemblymember Pretlow,

I'm writing to you from Sunkeeper Solar regarding the 2025-2026 executive budget.

Sunkeeper Solar is a New York City based solar design and installation company. We are headquartered in Brooklyn and employ 40 people to pursue our goal of installing solar and energy storage in the greater New York City area.

Increasing solar energy supply in New York can directly advance the Governor's Affordability Agenda by lowering electricity bills for homes and businesses across the state. However, the 2025-2026 Executive Budget and the Governor's policy agenda outlined in her State-of-the-State address do not include any policies to advance cost-effective solar deployment in New York State.

Rooftop and community solar ("distributed solar") is New York's most successful clean energy sector, and continues to have incredible momentum following a record-setting year for the state. It is also the sector that employs the most workers, with 15,490 employees based on NYSEIDA's 2024 jobs census. Despite our industry's momentum, we are facing major challenges that threaten New York's solar industry, companies like mine, and our skilled workforce. These challenges can be overcome with smart policy proposals, and I encourage you to consider the following proposals in the 2025-2026 budget.

Raising the state's distributed solar goal to 20 gigawatts by 2035 ("20x35") will further push New York to close the gap on its renewable energy targets while lowering energy costs for families and businesses. In June 2024, NYSEIA released [20 Gigawatts by 2035](#), a policy roadmap to accelerate distributed solar deployment in New York. Adopting the proposals in this roadmap will deliver \$50B in direct utility bill savings to families and businesses, lower the cost of electricity for all customers, and create 15,000 additional sustainable jobs in the solar industry.

Regarding interconnection, New York solar and energy storage developers pay utilities to upgrade distribution systems in order to interconnect their projects to the grid, but the companies do not have any control over the work completed by the utility company, nor is there regulatory oversight on these utility costs. The cost to interconnect new projects has risen faster than inflation due to the utilities' inefficient designs, high overhead, and unchecked cost overruns. Better regulating utility interconnection costs and implementing a flexible

interconnection program— where utilities actively manage distributed energy resources with smart grid technology rather than overbuilding traditional utility infrastructure— will lower interconnection costs and shorten the timeline to connect new projects.

Finally, the NY-Sun program is NYSERDA's most successful clean energy program, supporting solar projects across much of New York State with modest capacity-based incentives, which are nearly exhausted. Near-term action is needed for market continuity, but long-term action will provide market-certainty and attract investment. Thus, NYSERDA's NY-Sun program must be extended, especially targeted to projects that directly lower energy costs for low- to moderate-income households or projects that are beneficially sited to minimize land use impacts.

Thank you for the opportunity to provide input, and for your important work to protect New York's environment and cost-effectively increase clean energy supply.

Sincerely,

A handwritten signature in black ink, appearing to read "Henry Hatch", written in a cursive style.

Henry Hatch

Director

Sunkeeper Solar Electric LLC



Sunnova Energy International, Inc.
20 Greenway Plaza, Suite 475
Houston, TX 77046
sunnova.com

January 28, 2025

Re: Sunnova Energy Testimony to Joint Legislative Budget Hearing on Energy and Environmental Conservation Regarding the 2025-2026 Executive Budget

Dear Senator Kreuger and Assemblymember Pretlow,

I'm writing to you from Sunnova Energy Inc, regarding the 2025-2026 executive budget.

Sunnova Energy is one of the nation's leading residential solar and storage companies, with over 14,000 customers and 110 MW of solar capacity in New York State.

Increasing solar energy supply in New York can directly advance the Governor's Affordability Agenda by lowering electricity bills for homes and businesses across the state. However, the 2025-2026 Executive Budget and the Governor's policy agenda outlined in her State-of-the-State address do not include any policies to advance cost-effective solar deployment in New York State.

Rooftop and community solar ("distributed solar") is New York's most successful clean energy sector, and continues to have incredible momentum following a record-setting year for the state. It is also the sector that employs the most workers, with 15,490 employees based on NYSEIDA's 2024 jobs census. Despite the strong presence of Sunnova and other solar companies in the state, we are facing significant challenges, and it has never been more clear that affordable, renewable energy requires smart policy at the state level.

Raising the state's distributed solar goal to 20 gigawatts by 2035 ("20x35") will further push New York to close the gap on its renewable energy targets while lowering energy costs for families and businesses. In June 2024, NYSEIA released [20 Gigawatts by 2035](#), a policy roadmap to accelerate distributed solar deployment in New York. Adopting the proposals in this roadmap will deliver \$50B in direct utility bill savings to families and businesses, lower the cost of electricity for all customers, and create 15,000 additional sustainable jobs in the solar industry.

The Governor expressed concerns about affordability in her State of the State address and Executive Budget proposal. Without urgent action, rising energy demands and inflation will cause energy costs to become an extreme financial burden on New Yorkers. Energy bills are already the third largest expense for New York households, with lower income households spending 10-20% of their income on energy alone.

Rooftop solar can be an affordable solution to this with the modernization of the residential solar tax credit. [Legislators and a coalition of renewable energy, housing and environmental organizations have advocated to raise the per-household cap for New York's only statewide solar incentive and make the credit accessible to low-income homeowners and seniors.](#) Thus, including [S.2626 \(Harckham\)](#) / [A.1373 \(Walker\)](#) in the final budget will make it more affordable



for homeowners across the state to install rooftop solar panels.

Finally, the NY-Sun program is NYSERDA's most successful clean energy program, supporting solar projects across much of New York State with modest capacity-based incentives, which are nearly exhausted. Near-term action is needed for market continuity, but long-term action will provide market-certainty and attract investment. Thus, NYSERDA's NY-Sun program must be extended, especially targeted to projects that directly lower energy costs for low- to moderate-income households.

Thank you for the opportunity to provide input, and for your important work to protect New York's environment and cost-effectively increase clean energy supply.

Sincerely,

Sterling Clifford
Director of Government Affairs
Sunnova Energy International, Inc.
20 Greenway Plaza, Suite 475
Houston, TX 77046

Please submit before 5PM Tuesday, January 28th, 2025

Send to: wamchair@nyassembly.gov AND financechair@nysenate.gov

Subject: Brooklyn Solarworks Testimony to Joint Legislative Budget Hearing on Energy and Environmental Conservation Regarding the 2025-2026 Executive Budget

January 28, 2025

Re: Brooklyn Solarworks Testimony to Joint Legislative Budget Hearing on Energy and Environmental Conservation Regarding the 2025-2026 Executive Budget

Dear Senator Kreuger and Assemblymember Pretlow,

I'm writing to you from Brooklyn Solarworks regarding the 2025-2026 executive budget.

Brooklyn SolarWorks (aka BSW) is a turnkey residential and multifamily solar installation company that has been operating in New York since 2015. With a team of 80 employees, BSW is focused on providing solar energy solutions to homeowners in the unique, urban setting of New York City.

Increasing solar energy supply in New York can directly advance the Governor's Affordability Agenda by lowering electricity bills for homes and businesses across the state. However, the 2025-2026 Executive Budget and the Governor's policy agenda outlined in her State-of-the-State address do not include any policies to advance cost-effective solar deployment in New York State.

Rooftop and community solar ("distributed solar") is New York's most successful clean energy sector, and continues to have incredible momentum following a record-setting year for the state. It is also the sector that employs the most workers, with 15,490 employees based on NYSEIDA's 2024 jobs census. Despite our industry's momentum, we are facing major challenges that threaten New York's solar industry, companies like mine, and our skilled workforce. These challenges can be overcome with smart policy proposals, and I encourage you to consider the following proposals in the 2025-2026 budget.

Raising the state's distributed solar goal to 20 gigawatts by 2035 ("20x35") will further push New York to close the gap on its renewable energy targets while lowering energy costs for families and businesses. In June 2024, NYSEIA released [20 Gigawatts by 2035](#), a policy roadmap to accelerate distributed solar deployment in New York. Adopting the proposals in this roadmap will deliver \$50B in direct utility bill savings to families and businesses, lower the cost of electricity for all customers, and create 15,000 additional sustainable jobs in the solar industry.

The Governor expressed concerns about affordability in her State of the State address and Executive Budget proposal. Without urgent action, rising energy demands and inflation will cause energy costs to become an extreme financial burden on New Yorkers. Energy bills are already the third largest expense for New York households, with lower income households spending 10-20% of their income on energy alone.

Rooftop solar can be an affordable solution to this with the modernization of the residential solar tax credit. [Legislators and a coalition of renewable energy, housing and environmental organizations have advocated to raise the per-household cap for New York's only statewide solar incentive and make the credit accessible to low-income homeowners and seniors.](#) Thus, including [S.2626 \(Harckham\)](#) / A.1373 (Walker) in the final budget will make it more affordable for homeowners across the state to install rooftop solar panels.

Finally, the NY-Sun program is NYSERDA's most successful clean energy program, supporting solar projects across much of New York State with modest capacity-based incentives, which are nearly exhausted. Near-term action is needed for market continuity, but long-term action will provide market-certainty and attract investment. Thus, NYSERDA's NY-Sun program must be extended, especially targeted to projects that directly lower energy costs for low- to moderate-income households.

Thank you for the opportunity to provide input, and for your important work to protect New York's environment and cost-effectively increase clean energy supply.

Sincerely,

TR Ludwig

CEO

Brooklyn Solarworks, LLC

A handwritten signature in cursive script that reads "TR Ludwig".

January 28, 2025

Re: GreenSpark Solar Testimony to Joint Legislative Budget Hearing on Energy and Environmental Conservation Regarding the 2025-2026 Executive Budget

Dear Senator Kreuger and Assemblymember Pretlow,

I'm writing to you from GreenSpark Solar regarding the 2025-2026 executive budget.

GreenSpark Solar has been operating for over 20 years in the upstate New York region near Rochester. We have installed and scheduled over 350 MW of solar in our history, and over 1,200 projects across the state. We have almost 150 direct employees located in and around the Rochester region.

Increasing solar energy supply in New York can directly advance the Governor's Affordability Agenda by lowering electricity bills for homes and businesses across the state. However, the 2025-2026 Executive Budget and the Governor's policy agenda outlined in her State-of-the-State address do not include any policies to advance cost-effective solar deployment in New York State.

Rooftop and community solar ("distributed solar") is New York's most successful clean energy sector, and continues to have incredible momentum following a record-setting year for the state. It is also the sector that employs the most workers, with 15,490 employees based on NYSERDA's 2024 jobs census. Despite our industry's momentum, we are facing major challenges that threaten New York's solar industry, companies like mine, and our skilled workforce. These challenges can be overcome with smart policy proposals, and I encourage you to consider the following proposals in the 2025-2026 budget.

Raising the state's distributed solar goal to 20 gigawatts by 2035 ("20x35") will further push New York to close the gap on its renewable energy targets while lowering energy costs for families and businesses. In June 2024, NYSEIA released [20 Gigawatts by 2035](#), a policy roadmap to accelerate distributed solar deployment in New York. Adopting the proposals in this roadmap will deliver \$50B in direct utility bill savings to families and businesses, lower the cost of electricity for all customers, and create 15,000 additional sustainable jobs in the solar industry.

The Governor expressed concerns about affordability in her State of the State address and Executive Budget proposal. Without urgent action, rising energy demands and inflation will cause energy costs to become an extreme financial burden on New Yorkers. Energy bills are already the third largest expense for New York households, with lower income households spending 10-20% of their income on energy alone.

Rooftop solar can be an affordable solution to this with the modernization of the residential solar tax credit. [Legislators and a coalition of renewable energy, housing and environmental](#)

organizations have advocated to raise the per-household cap for New York's only statewide solar incentive and make the credit accessible to low-income homeowners and seniors. Thus, including S.2626 (Harckham) / A.1373 (Walker) in the final budget will make it more affordable for homeowners across the state to install rooftop solar panels.

Finally, the NY-Sun program is NYSERDA's most successful clean energy program, supporting solar projects across much of New York State with modest capacity-based incentives, which are nearly exhausted. Near-term action is needed for market continuity, but long-term action will provide market-certainty and attract investment. Thus, NYSERDA's NY-Sun program must be extended, especially targeted to projects that directly lower energy costs for low- to moderate-income households.

Thank you for the opportunity to provide input, and for your important work to protect New York's environment and cost-effectively increase clean energy supply.

Sincerely,

Skyler Willman-Cole

Skyler Willman-Cole

Director of Residential Operations

GreenSpark Solar

January 28, 2025

Re: Sunrun Testimony to Joint Legislative Budget Hearing on Energy and Environmental Conservation Regarding the 2025-2026 Executive Budget

Dear Senator Kreuger and Assemblymember Pretlow,

I'm writing to you from Sunrun regarding the 2025-2026 executive budget.

Sunrun is the nation's largest rooftop solar and storage developer with more than 1 million customers in 22 states across the United States. Sunrun began installing solar in New York in 2011, and we expanded our offerings to include battery storage for New Yorkers in 2017. To date, we have thousands of customers and hundreds of employees working in the Empire state. Given New York's increasing energy needs, we think that rooftop solar and storage are key pillars to generate pollution-free electricity for people across the state.

Increasing solar energy supply in New York can directly advance the Governor's Affordability Agenda by lowering electricity bills for homes and businesses across the state. However, the 2025-2026 Executive Budget and the Governor's policy agenda outlined in her State-of-the-State address do not include any policies to advance cost-effective solar deployment in New York State.

Rooftop and community solar ("distributed solar") is New York's most successful clean energy sector, and continues to have incredible momentum following a record-setting year for the state. It is also the sector that employs the most workers, with 15,490 employees based on NYSEIDA's 2024 jobs census. Despite our industry's momentum, we are facing major challenges that threaten New York's solar industry, companies like mine, and our skilled workforce. These challenges can be overcome with smart policy proposals, and I encourage you to consider the following proposals in the 2025-2026 budget.

Raising the state's distributed solar goal to 20 gigawatts by 2035 ("20x35") will further push New York to close the gap on its renewable energy targets while lowering energy costs for families and businesses. In June 2024, NYSEIA released [20 Gigawatts by 2035](#), a policy roadmap to accelerate distributed solar deployment in New York. Adopting the proposals in this roadmap will deliver \$50B in direct utility bill savings to families and businesses, lower the cost of electricity for all customers, and create 15,000 additional sustainable jobs in the solar industry.

The Governor expressed concerns about affordability in her State of the State address and Executive Budget proposal. Without urgent action, rising energy demands and inflation will cause energy costs to become an extreme financial burden on New Yorkers. Energy bills are

already the third largest expense for New York households, with lower income households spending 10-20% of their income on energy alone.

Rooftop solar can be an affordable solution to this with the modernization of the residential solar tax credit. According to [Lawrence Berkeley Lab](#), in 2023 in New York, 60% of rooftop solar installations were on households with incomes below \$150,000. Solar adoption is continuing to reach a larger and larger share of people with lower incomes. [Legislators and a coalition of renewable energy, housing and environmental organizations have advocated to raise the per-household cap for New York's only statewide solar incentive and make the credit accessible to low-income homeowners and seniors](#). Thus, including [S.2626 \(Harckham\) / A.1373 \(Walker\)](#) in the final budget will make it more affordable for homeowners across the state to install rooftop solar panels.

Finally, the NY-Sun program is NYSERDA's most successful clean energy program, supporting solar projects across much of New York State with modest capacity-based incentives, which are nearly exhausted. **Near-term action is needed for market continuity, but long-term action will provide market-certainty and attract investment.** Thus, NYSERDA's NY-Sun program must be extended, especially targeted to projects that directly lower energy costs for low- to moderate-income households.

Thank you for the opportunity to provide input, and for your important work to protect New York's environment and cost-effectively increase clean energy supply.

Sincerely,

Bartlett Jackson
Sr. Manager of Policy
Sunrun



January 28, 2025

Re: U.S. Light Energy Testimony to Joint Legislative Budget Hearing on Energy and Environmental Conservation Regarding the 2025-2026 Executive Budget

Dear Senator Krueger and Assemblymember Pretlow,

I am writing to you from U.S. Light Energy (USLE), a New York based Distributed Generation energy development company specializing in Community Solar facilities and renewable energy, to express strong support for policies that enable cost-effective solar deployment in New York State.

Increasing distributed solar and energy storage is essential to achieving New York's clean energy goals while advancing the Governor's Affordability Agenda by lowering electricity bills for homes and businesses. However, the 2025-2026 Executive Budget and the Governor's State of the State address fail to include policies that support community solar, interconnection reform, and distributed energy growth, all of which are critical to a more reliable, affordable, and clean energy future for New York.

The Need for Stronger State Action

New York's distributed solar industry remains the state's most successful clean energy sector, employing 15,490 workers according to NYSERDA's 2024 jobs census. However, despite strong market momentum, regulatory hurdles, rising interconnection costs, and siting restrictions are stalling solar deployment—jeopardizing projects, jobs, and bill savings for consumers. We strongly encourage the Legislature to include the following policy solutions in the 2025-2026 budget:

1. **Interconnection Reform: Cost Certainty & Grid Modernization**
 - Developers pay utility-driven interconnection costs, yet there is no oversight over how those funds are used or whether upgrades are efficient.
 - Costs continue to rise faster than inflation, due to utility inefficiencies, lack of cost controls, and unpredictable upgrade requirements.
 - We support better regulatory oversight on interconnection costs, as well as flexible interconnection programs that allow utilities to actively manage distributed energy resources rather than overbuilding grid infrastructure. We advocate for cost-sharing mechanisms, streamlined technical reviews, and improved hosting capacity.
2. **Community Solar Siting Reform through Legislative Action & Lobbying**
 - Local restrictions and moratoria are blocking 4.6 GW of viable community solar projects, despite their ability to reduce energy costs for residents.
 - We support state-level permitting standards, modeled after Illinois' community solar siting reform, that balance local zoning authority with predictable permitting pathways for projects.
3. **Energy Storage Incentives to Support Grid Resilience**
 - Expanding energy storage is critical for reliability, yet permitting and incentive structures remain unclear, especially in NYC.

- We support dedicated funding and tax credits to accelerate distributed energy storage deployment.
4. Feeder Compensation Standardization
 - Clarifying and standardizing DRV & LSRV calculations to ensure fair and transparent valuation of distributed solar's grid benefits.
 - Current locational value compensation mechanisms—including the Demand Reduction Value (DRV) and Locational System Relief Value (LSRV)—lack consistency and predictability, making it difficult for developers to plan projects with confidence.
 - A standardized methodology is needed to properly reflect the grid value of distributed solar, avoid arbitrary fluctuations in compensation, and provide long-term financial predictability for projects.
 5. Pushing Back on DEC Wetlands Jurisdiction Expansion
 - DEC's expanded wetlands regulations lack a clear permitting pathway for solar, forcing developers to halt new projects.
 - We urge the DEC to establish a general permit for solar based on USACE's Nationwide Permit 51, ensuring that renewable energy can be deployed responsibly.

Conclusion

New York has an opportunity to lead the nation in cost-effective, distributed solar and storage deployment, but without targeted policy support, rising interconnection costs, restrictive permitting, and lack of financial certainty will hinder progress.

As a solar developer invested in New York's clean energy future, we urge the Legislature to act on these policy priorities to ensure continued solar industry growth, lower electricity costs, and a stronger renewable energy workforce.

Thank you for your time and consideration. We look forward to working with you to make New York a leader in solar and energy storage innovation.

Sincerely,



Mark Richardson (Jan 28, 2025 12:59 EST)

Mark Richardson
Chief Executive Officer
U.S. Light Energy



January 28, 2025

Re: PosiGen Testimony to Joint Legislative Budget Hearing on Energy and Environmental Conservation Regarding the 2025-2026 Executive Budget

Dear Senator Kreuger and Assemblymember Pretlow,

I'm writing to you from PosiGen regarding the 2025-2026 executive budget.

PosiGen is committed to making "Solar for All" a reality. As a certified B Corp, we are dedicated to saving families money and investing in underserved communities. We strive to simplify solar, improve home energy efficiency, and generate economic opportunities for the communities we serve by putting people first. We have over 2,000 customers across New York through working with local contractors to offer our unique solar lease that has no FICO or income requirements and includes a savings guarantee.

Increasing solar energy supply in New York can directly advance the Governor's Affordability Agenda by lowering electricity bills for homes and businesses across the state. Due to the fact that we primarily serve low-and-moderate income households, we have seen the impact of high energy costs on our customers and we believe that solar and energy efficiency can help significantly reduce those costs. However, the 2025-2026 Executive Budget and the Governor's policy agenda outlined in her State-of-the-State address do not include any policies to advance cost-effective solar deployment in New York State.

Rooftop and community solar ("distributed solar") is New York's most successful clean energy sector, and continues to have incredible momentum following a record-setting year for the state. It is also the sector that employs the most workers, with 15,490 employees based on NYSEIDA's 2024 jobs census. Despite our industry's momentum, we are facing major challenges that threaten New York's solar industry, companies like mine, and our skilled workforce. These challenges can be overcome with smart policy proposals, and I encourage you to consider the following proposals in the 2025-2026 budget.

Raising the state's distributed solar goal to 20 gigawatts by 2035 ("20x35") will further push New York to close the gap on its renewable energy targets while lowering energy costs for families and businesses. In June 2024, NYSEIA released [20 Gigawatts by 2035](#), a policy roadmap to accelerate distributed solar deployment in New York. Adopting the proposals in this roadmap will deliver \$50B in direct utility bill savings to families and businesses, lower the cost of electricity for all customers, and create 15,000 additional sustainable jobs in the solar industry.

The Governor expressed concerns about affordability in her State of the State address and Executive Budget proposal. Without urgent action, rising energy demands and inflation will cause energy costs to become an extreme financial burden on New Yorkers. Energy bills are

already the third largest expense for New York households, with lower income households spending 10-20% of their income on energy alone.

Rooftop solar can be an affordable solution to this with the modernization of the residential solar tax credit. Legislators and a coalition of renewable energy, housing and environmental organizations have advocated to raise the per-household cap for New York's only statewide solar incentive and make the credit accessible to low-income homeowners and seniors. Thus, including S.2626 (Harckham) / A.1373 (Walker) in the final budget will make it more affordable for low-and-moderate income homeowners across the state to install rooftop solar panels. The current structure of the tax credit is inequitable because low-income households are unable to fully utilize the credit in the first year, and may not even be able to use the full amount over several years.

Finally, the NY-Sun program is NYSERDA's most successful clean energy program, supporting solar projects across much of New York State with modest capacity-based incentives, which are nearly exhausted. Near-term action is needed for market continuity, but long-term action will provide market-certainty and attract investment. Thus, NYSERDA's NY-Sun program must be extended, especially targeted to projects that directly lower energy costs for low- to moderate-income households.

Thank you for the opportunity to provide input, and for your important work to protect New York's environment and cost-effectively increase clean energy supply.

Sincerely,

/s/ Kyle Wallace

Kyle Wallace

VP, Public Policy & Government Affairs

PosiGen, PBC



20 WEST FAIRVIEW AVENUE
VALLEY STREAM, NY 11580

TEL: 212 730 2267/516 596 8811/201 377 1621 FAX: 646 225 7234
E-MAIL INFO@BESTENERGYPOWER.COM

January 28, 2025

Re: Best Energy Power Testimony to Joint Legislative Budget Hearing on Energy and Environmental Conservation Regarding the 2025-2026 Executive Budget

Dear Senator Kreuger and Assemblymember Pretlow,

I'm writing to you from Best Energy Power (BEP) regarding the 2025-2026 executive budget.

We have the biggest market share of small commercial solar, I the 5 boroughs of NYC.

Increasing solar energy supply in New York can directly advance the Governor's Affordability Agenda by lowering electricity bills for homes and businesses across the state. However, the 2025-2026 Executive Budget and the Governor's policy agenda outlined in her State-of-the-State address do not include any policies to advance cost-effective solar deployment in New York State.

Rooftop and community solar ("distributed solar") is New York's most successful clean energy sector, and continues to have incredible momentum following a record-setting year for the state. It is also the sector that employs the most workers, with 15,490 employees based on NYSEIDA's 2024 jobs census. Despite our industry's momentum, we are facing major challenges that threaten New York's solar industry, companies like mine, and our skilled workforce. These challenges can be overcome with smart policy proposals, and I encourage you to consider the following proposals in the 2025-2026 budget.

Raising the state's distributed solar goal to 20 gigawatts by 2035 ("20x35") will further push New York to close the gap on its renewable energy targets while lowering energy costs for families and businesses. In June 2024, NYSEIA released [20 Gigawatts by 2035](#), a policy roadmap to accelerate distributed solar deployment in New York. Adopting the proposals in this roadmap

will deliver \$50B in direct utility bill savings to families and businesses, lower the cost of electricity for all customers, and create 15,000 additional sustainable jobs in the solar industry.

Currently, community-scale solar projects face both siting and interconnection challenges, delaying the development of many solar projects throughout the state.

Community-scale projects are permitted by local governments, who are increasingly adopting restrictive local laws and moratoria in response to utility-scale projects and/or misinformation. An estimated 4.6 gigawatts of otherwise viable community solar projects are being blocked due to restrictive local laws. New York can easily replicate Illinois' model of siting reform, where the state streamlines local permitting by creating statewide standards for community solar while keeping project-specific zoning decisions at the local level. This approach simultaneously respects "home rule" while creating viable permitting pathways for community solar projects across the state.

At the beginning of this year, the DEC drastically expanded its jurisdiction over wetlands and surrounding areas, with the agency's jurisdiction set to expand further in the coming years. Protecting New York's ecological resources is important, but it must be balanced with the need to deploy renewable energy. The DEC does not yet have a general permit for solar projects, and until now the agency has enforced a de facto ban against solar on any land it regulates. This is causing community companies to cease all new solar development in the state, imperiling our clean energy progress and solar workforce. We urge the DEC to rapidly develop a general permit that allows solar on most sites where it would be permitted by the national standard—USACE's Nationwide Permit 51.

Regarding interconnection, New York solar and energy storage developers pay utilities to upgrade distribution systems in order to interconnect their projects to the grid, but the companies do not have any control over the work completed by the utility company, nor is there regulatory oversight on these utility costs. The cost to interconnect new projects has risen faster than inflation due to the utilities' inefficient designs, high overhead, and unchecked cost overruns. Better regulating utility interconnection costs and implementing a flexible interconnection program— where utilities actively manage distributed energy resources with smart grid technology rather than overbuilding traditional utility infrastructure— will lower interconnection costs and shorten the timeline to connect new projects.

Finally, the NY-Sun program is NYSERDA's most successful clean energy program, supporting solar projects across much of New York State with modest capacity-based incentives, which are nearly exhausted. Near-term action is needed for market continuity, but long-term action will provide market-certainty and attract investment. Thus, NYSERDA's NY-Sun program must be extended, especially targeted to projects that directly lower energy costs for low- to moderate-income households or projects that are beneficially sited to minimize land use impacts.

Thank you for the opportunity to provide input, and for your important work to protect New York's environment and cost-effectively increase clean energy supply.

Sincerely,
Ronnie Mandler
Ronnie Mandler

President
Best Energy

