


Article 10 & SEQR Under the Clean Energy Standard



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

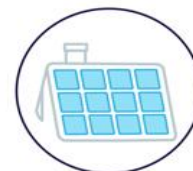
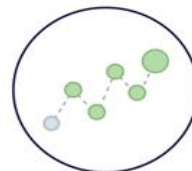
About SEIA:

- Founded in 1974
- 1,000 member companies from all 50 states
- Our Mission: Build a strong solar industry to power America
- Our Goal: 100 gigawatts of solar capacity by 2020
- More than 60 companies in NY



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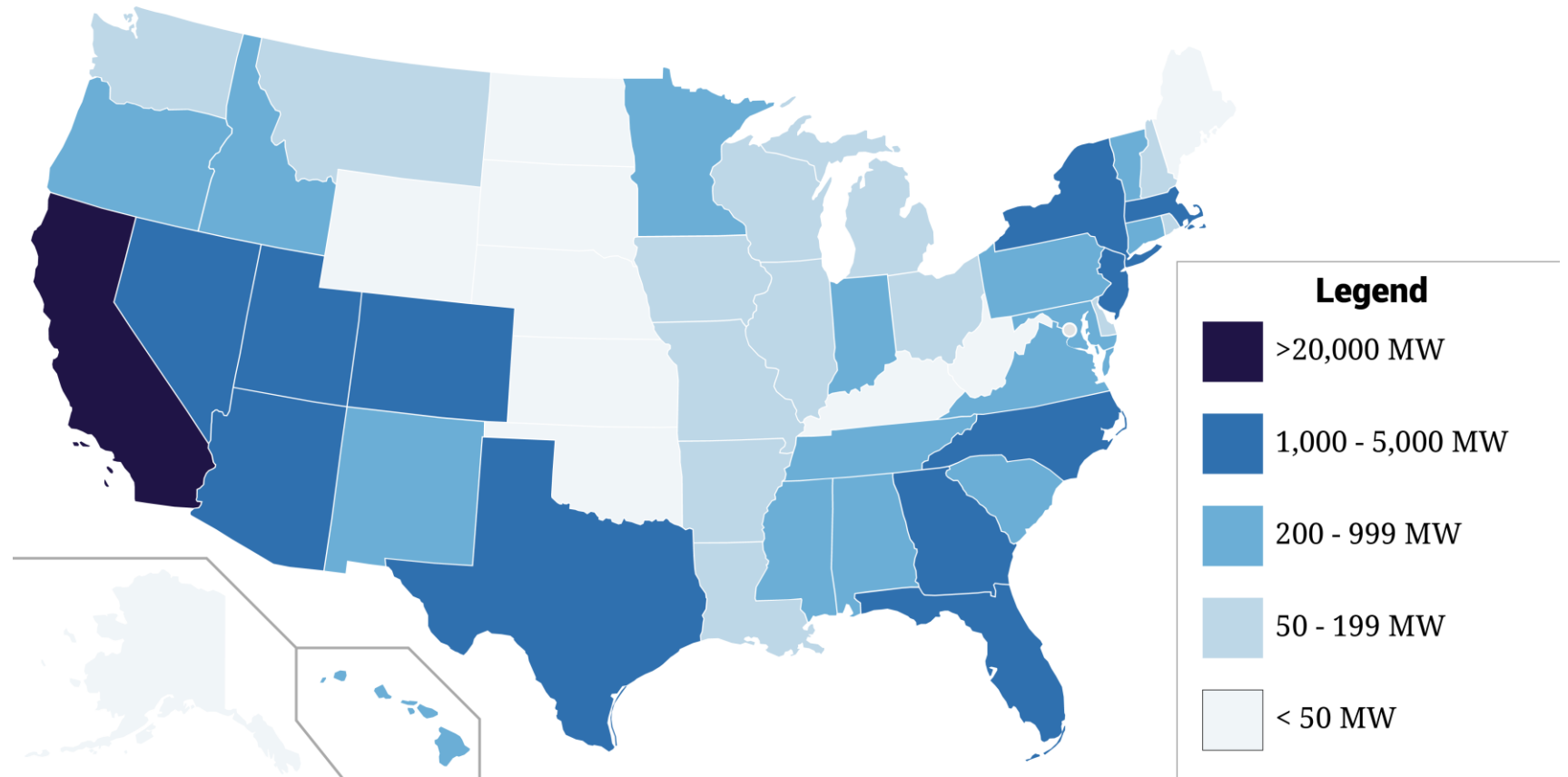
U.S. Solar Industry - 50 State Market

Cumulative Solar Capacity by State through Q2 2018

TOP 10 STATES (MW)

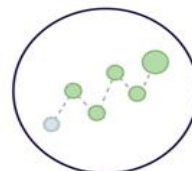
1. California – 22,777
2. North Carolina – 4,491
3. Arizona – 3,613
4. Nevada – 2,658
5. Texas – 2,624
6. New Jersey – 2,526
7. Massachusetts – 2,226
8. Florida – 1,943
9. Utah – 1,627
10. Georgia – 1,556

Source: SEIA/Wood Mackenzie Power & Renewables *U.S. Solar Market Insight Q2*



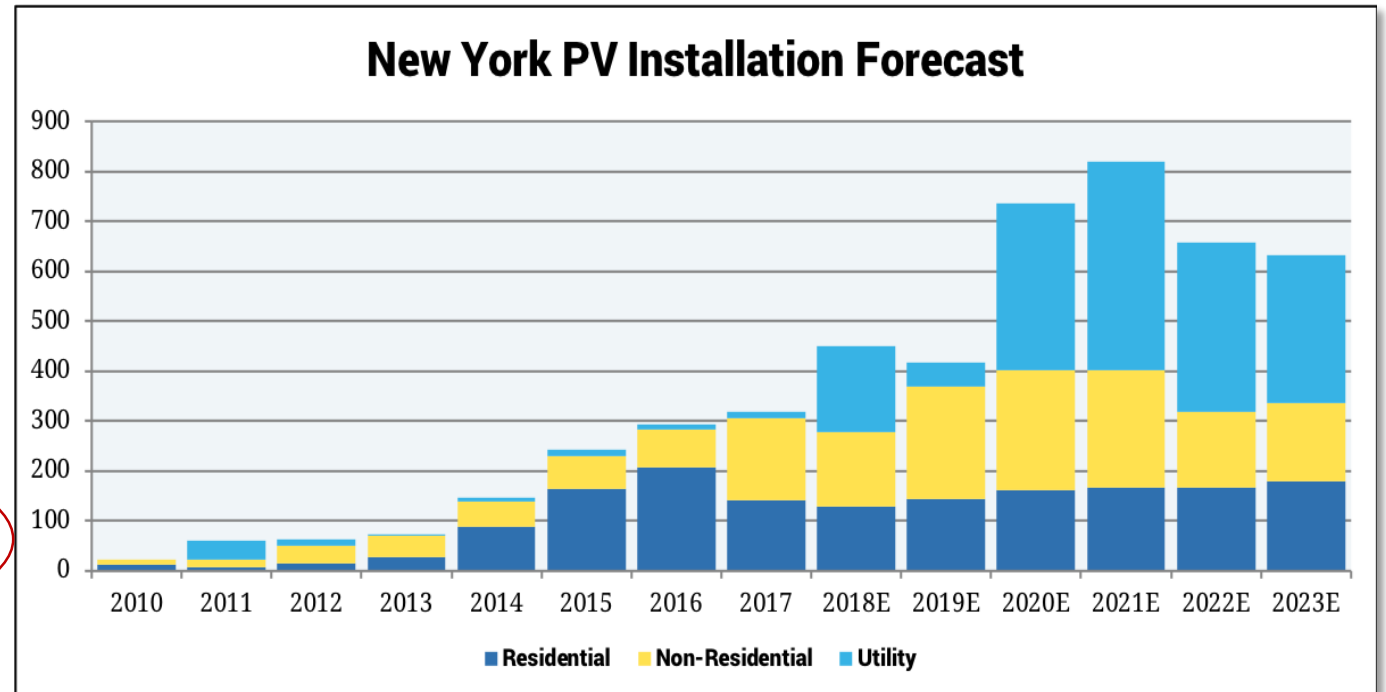
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New York (11th)

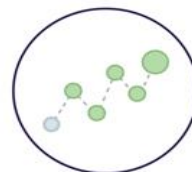
- Solar Installed: **1,462.93 MW**
- State Homes Powered by Solar: **243,124**
- Percentage of State's Electricity from Solar: **1.14%**
- Total Solar Investment in State **~\$4 Billion**
- Growth Projection & Ranking: **3,265 MW over the next 5 years (ranks 5th)**
- Number of Installations: **102,508**



Source: SEIA/Wood Mackenzie Power & Renewables U.S. Solar Market Insight Q2

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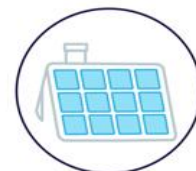
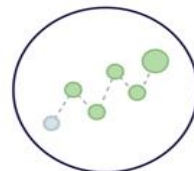
Article 10 – Projects Under Review

Steps	Solar	Wind	Other	Total
1. Public Involvement Program (PIP) Submittals	9	6	2	17
2. Preliminary Scoping Statement (PSS) Submittals	6	7	1	14
3. Applications Submitted	0	2	0	2
4. Applications Deemed Compliant	0	4	0	4
5. Applications Approved	0	1	0	1
6. Certified Projects	0	0	1	1

Source: NYS DPS – As of November 12, 2018. Available at:
<http://www3.dps.ny.gov//W/PSCWeb.nsf/All/06041D757BAFCC25852579D0006972C0?OpenDocument>

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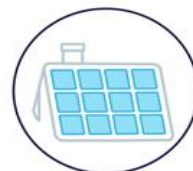
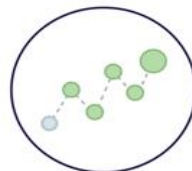


Article 10 - Process Improvements Needed

1. Improve processing times for certain reviews

2. Need for better communications between parties

3. Need to set standards/establish regulatory baseline

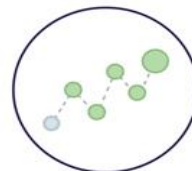


Improve Processing Times/Application Review

- Completeness reviews should be more predictable & streamlined.
 - Deficiencies should be limited to material issues.
 - Initial deficiency letter should contain ALL the deficiencies, eliminate multiple rounds of deficiency reviews.
 - Issue deficiency letter once review is complete, i.e. don't sit on it until the 60 day threshold.
- Coordinate ALL agency (DAM, DEC etc...) responses to ensure responses are not conflicting or duplicative.

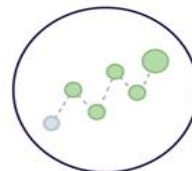
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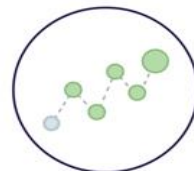
Better Communication Between Parties

- Encourage more informal communication between Applicants & Staff.
 - E.G. completeness reviews - DPS Staff should be able to ask clarifying questions & ID likely deficiencies in advance.
- Encourage DPS, DEC Staff to identify key issues that need to be resolved earlier in the process.
- Doesn't need to be an adversarial process.



Establish the Regulatory Baseline

- Develop guidance or best practices to be used to set expectations for projects.
 - Establish that certain kinds of analyses are not needed in every case (e.g. noise impacts for solar projects).
- Conformity to issued guidance could then be used as standard of review to accelerate the application process.

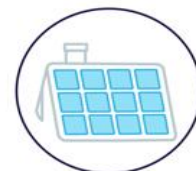
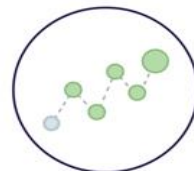


SEQR

- DEC recently classified certain DG projects (e.g., landfill projects, brownfields, etc.) as Type 2 SEQR projects (no significant environmental impact.)
- Extend similar treatment to DG projects already identified by local ordinance as suitable for solar.
- Let the town lead as much as possible on where to site these projects, and to reflect that in the SEQR rules.

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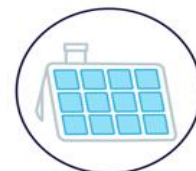
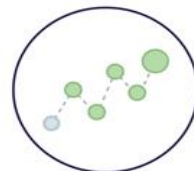


Article 10 & SEQR Conclusions

- Processing delays & procedural hoop jumping adds cost to all renewables projects.
- Establish guidelines to help set expectations for developers.
- Extend Type II designations to more types of solar projects.
- Align the permitting process with state goals of bringing more clean energy to the grid.

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Questions
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