



**Testimony of Zack Dufresne, Executive Director
New York Solar Energy Industries Association
to the
Finance, Energy and Telecommunications, and Environmental Conservation Committees**

**Hearing to Examine the Legislative and Budgetary Actions Necessary to Implement the
Climate Action Council Final Scoping Plan**

January 19, 2023

New York Solar Energy Industries Association (NYSEIA) appreciates the opportunity to provide testimony on the legislative and budgetary actions necessary for implementation of the Climate Action Council Final Scoping Plan.

NYSEIA is a nonprofit industry trade association proudly representing hundreds of distributed solar and storage businesses with thousands of employees across the Empire State. Our mission is to advance and accelerate distributed solar energy and energy storage deployment in New York State through engagement on key legislative, regulatory, and statutory policy matters affecting these industries. Our membership is primarily composed of local, regional and national firms working every day to help achieve the ambitious clean energy and equity goals outlined in the Climate Leadership and Communities Protection Act (CLCPA).

NYSEIA strongly supports the Climate Action Council's Final Scoping Plan. This course of action will reduce home health risks and strengthen economic resilience in our communities. The planned investments will also provide new opportunities for high-quality jobs across NY, further stimulating local economies. The solar industry also shares the Council's commitment to the focus on equity and environmental justice, and the proposed principles for a just transition and prioritization of workforce development.

In regard to the zero-emission power sector by 2040 goal, distributed solar and storage projects (DERs) present a unique opportunity to reduce costs and save ratepayer money on our pathway to an advanced energy economy. Localized generation and storage adds efficiencies and avoids unnecessary spending by curtailing grid investments. We urge the State to utilize DERs to the fullest extent possible to avoid costs and maximize benefits for all New Yorkers.

NYSEIA respectfully emphasizes support for the following Plan recommendations:

- Expansion of the Solar Energy Equity Framework (SEEF) programs, including the Community Adder and the Inclusive Community Solar Adder. A foundational goal of the Climate Leadership and Community Protection Act (CLCPA) is to target 40% of program benefits to LMI families and Disadvantaged Communities. New York is



the top community solar market in the country¹, and community solar projects are a critical way to target the benefits of solar energy to those communities². One area for improvement is removing barriers to enrollment in community solar projects such as complex document requirements and requiring families to provide an attestation of their low-income status to prove eligibility. Additionally, residential solar policies could be strengthened to benefit Disadvantaged Communities by expanding the existing Solar Equipment Tax Credit to make it refundable for LMI families allowing them to fully capture its benefits.

- Speed up the pace of processing interconnection applications to mitigate costly delays and ensure our climate goals are met. We note this may require more stringent oversight of the utilities to address the need for right-sizing human resources at these monopoly entities. This is applicable not only to interconnection processing, but also grid planning and DER program implementation such as Community Solar programs. This may require newly established penalties and performance metrics to hold utilities accountable for their obligations under the CLCPA.
- Identify workforce development opportunities to ensure a just transition for workers who are displaced by the transition from fossil fuel to renewable energy infrastructure, and establish programs that will incentivize young people just entering the workforce to pursue a career in renewable energy. NYSEIA member companies are uniquely positioned to materialize these jobs. The Distributed Solar Industry is one of the top job producers in New York State, and these jobs not only provide benefits and security to New York’s workforce, they also have a catalytic impact on the local economy.
- Regarding the Gas System Transition Plan Framework, NYSEIA commends the Climate Action Council for acknowledging the need to identify zero emission technologies including non-wire alternatives that can replace gas systems as the State transitions to electrification. As we move beyond our dependence on natural gas, solar and energy storage are ideally positioned to provide these types of grid services while creating job opportunities for displaced gas workers. The State should facilitate this transition by requiring solar for all new construction and significant renovations.
- NYSEIA commends the Climate Action Council for having the foresight to consider the need for end-of-life management of solar equipment. The solar industry is committed to the responsible management of our waste stream, and we look forward to engaging in a collaborative process with the State to ensure the recycling infrastructure we need to

¹ New York Executive Chamber. (2022, March 22). Governor Hochul Announces New York as Top Community Solar Market in the United States [[Press Release](#)].

² US Department of Energy. Clean Energy for Low Income Communities: Community Solar. <https://betterbuildingssolutioncenter.energy.gov/CELICA-Toolkit/community-solar>



support our future growth. NYSEIA strongly encourages the State to study the unique aspects of creating a solar panel recycling market in New York State, and to consider creating a tax credit that incentivizes existing recycling facilities to add solar panel recycling capabilities to their operations.

Thank you for the opportunity to provide this testimony. New York Solar Energy Industries Association (NYSEIA) looks forward to the opportunity to engage with the legislature on these and other issues critical to ensure the achievement of New York's ambitious renewable energy goals.

Respectfully,

Zack Dufresne
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New York Solar Energy Industries Association