

Energy Storage Interconnection Guide



NYSERDA



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For questions related to information found in this reference guide,
please contact energystorage@nyserda.ny.gov.

Introduction

Depending on the size and location of an energy storage project, several different interconnection processes could apply. This document is intended to serve as a guide for energy storage project developers on each of these interconnection processes.

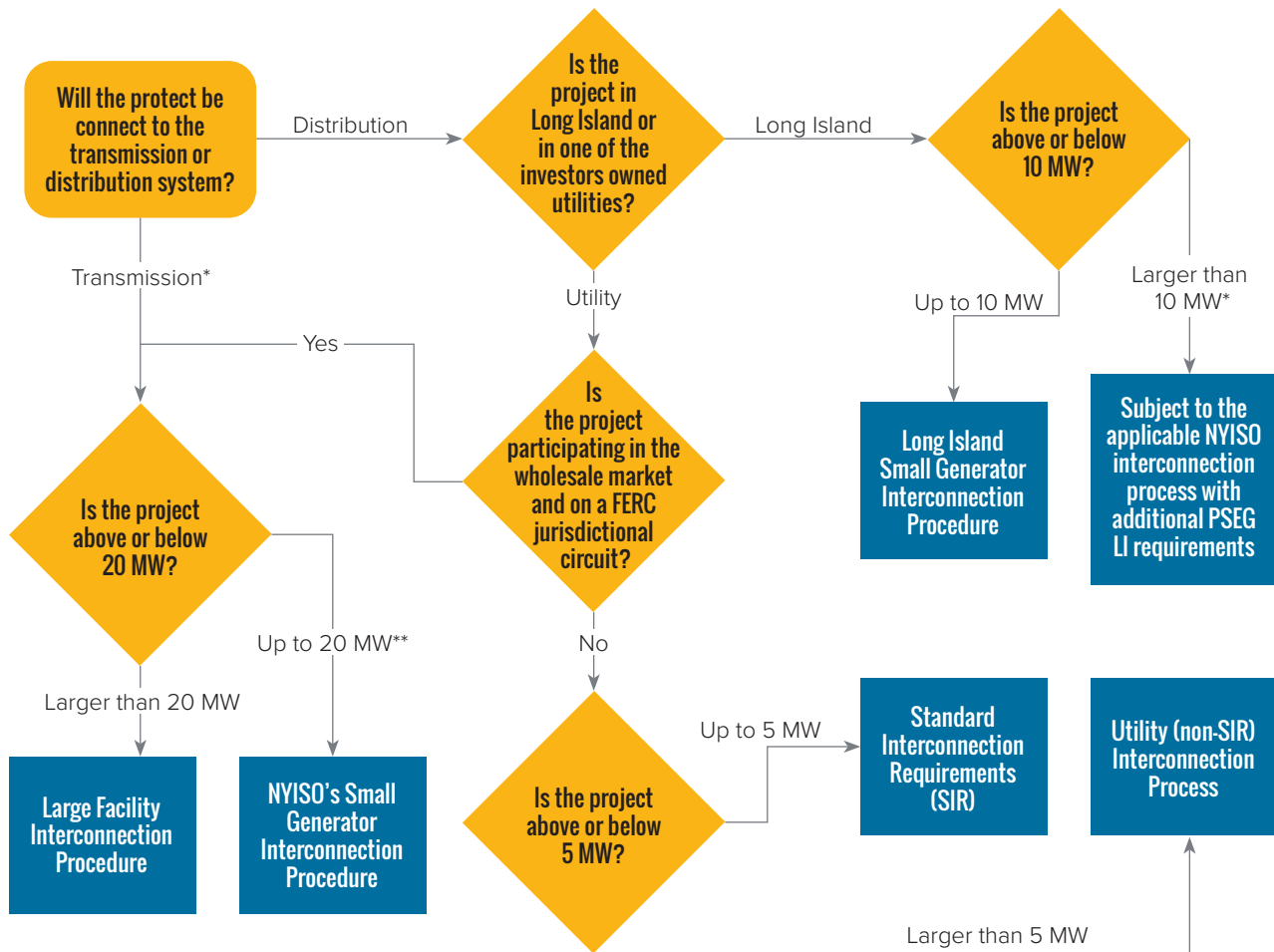
Interconnection

Interconnection is generally characterized at two different levels: the utility-level (distribution system) or New York Independent System Operator (NYISO)-level (transmission system). There are multiple interconnection processes at each of these levels. Further, there is an important distinction of whether the project intends to participate in the NYISO markets. If the project intends to participate in NYISO markets and is not the first project on the distribution circuit to do so, then the interconnection is governed by the NYISO process irrespective of size or interconnection point. In some of these cases, a project will effectively need to go through both a utility interconnection and a NYISO process in parallel. On Long Island, new distributed generation facilities 10 MW and above must connect to the Long Island Power Authority’s (LIPA) transmission system under the applicable NYISO process. The table below provides a brief summary of each of the application processes in New York State. Note that project size values are based on maximum AC power at the point of interconnection.

Interconnection Process	Project Size	Important Notes
SIR (Standardized Interconnection Requirements)	<=5 MW, utility connected	This is the standard process for interconnecting to the distribution system.
Utility Interconnection	>5 MW, utility connected	Projects that are not eligible for the SIR and are looking to interconnect at the distribution level or transmission level, but do not intend to participate in the NYISO markets or do intend to participate in the NYISO markets and the existing distribution system is not FERC jurisdictional.
NYISO SGIP (Small Generator Interconnection Procedures)	<=20 MW, NYISO connected	Small projects interconnecting to the transmission system or a FERC jurisdictional distribution system that intend to participate in the NYISO markets.
NYISO LFIP (Large Facility Interconnection Procedures)	>20 MW, NYISO connected	All large facility projects that intend to participate in the NYISO markets.
Long Island Interconnection Requirements	<10 MW	Projects interconnecting to LIPA’s distribution system; if a project is greater than 2 MW and seeks NYISO capacity rights, it is required to enter the NYISO Class Year Facilities Study for Deliverability Study.

FERC Jurisdiction

The bulk transmission system is under Federal Energy Regulatory Commission (FERC) jurisdiction. A distribution circuit is under FERC jurisdiction for the purposes of interconnection once a project participating in the wholesale markets is interconnected in that circuit. In practice, this means that the second and all later wholesale participating projects on each distribution circuit will have to go through the NYISO interconnection process (either LFIP or SGIP). Historically, wholesale market participants have not been built on the distribution system; therefore, the majority of distribution circuits in the State are non-FERC jurisdictional. Given the growth in DER deployment around the State, FERC jurisdictional distribution circuits are becoming more common. In order to determine whether a circuit is FERC jurisdictional or not, one must reach out to the NYISO at icpc@nyiso.com.



*Assumes NYISO market participation. Non NYISO participating projects will proceed through the Utility (non-SIR) Interconnection Process.
 **Projects greater than 2MW seeking to participate in the NYISO capacity market will also need to go through the Class Year Facilities Study.

Interconnection Process

Standardized Interconnection Requirements (SIR) Applicable to Investor Owned Utilities – The SIR governs the interconnection of distributed generation with an AC nameplate rating of 5 MW of AC or less and proposing to connect to the distribution system. This will be the primary interconnection process for projects receiving compensation through the Value of Distributed Energy Resources (VDER) export tariff or projects located behind a utility customer’s electric meter. Any questions about the SIR should be directed to the appropriate utility interconnection groups or ombudsman. Their contact information is available in the contact information section. Additionally, applications for SIR projects can be submitted online via the utility’s interconnection online application portal.

The application process is outlined in the following sections. Please note that UL 1741 certified inverter-based systems that are 50kW and less are eligible to follow an expedited application process as outlined in the SIR.

Pre-Application Report

Projects have the option to submit a request for a pre-application report (PAR). This is a nonbinding report, where the utility will provide information about the nearby distribution circuit based on the project’s proposed location including, circuit capacity, operating voltage of distribution line, circuit peak load, substation information, and other readily available information. This pre-application report is designed to give the developer more information about the potential barriers for interconnecting a project at a specific site. The report costs \$750 and the utilities have 10 business days to complete the report. If the developer converts the pre-application report to an interconnection application within 15 business days of receiving the results, this fee may be applied toward the cost of a full application.

Preliminary Screening Analysis

After the project submits an interconnection application package and \$750 fee, the utility will review the application for completeness within 10 business days of receipt and accept the project into the queue or alert the developer of deficiencies.

If accepted into the queue, the utility will then perform a preliminary screening analysis (PSA) within 15 business days of accepting the application. Inverter based systems must submit a completed Appendix B, and non-inverter-based systems must submit Appendix C. Appendix K is also required for all battery storage systems.

At this point, there are a several paths that a project may take. The project could pass all of the applicable utility screens (A-F)¹ in which case, the utility will return a signed NY Standard Interconnection Contract (NYSIC) and the applicant must execute and return the signed contract within 15 business days. The applicant may then proceed with interconnection.

If a project failed one or more of the screens, the applicant may request a meeting with the utility to review the preliminary screening analysis regarding why. Applicants have 10 business days to determine whether to proceed with a preliminary screening analysis meeting. In this meeting, the developer may discuss modifications that may obviate the need for a supplemental analysis (SA) or coordinated electric system interconnection review (CESIR). If the utility and applicant can agree on these modifications then the utility will return a non-binding cost estimate within 15 business days.

¹ The SIR process has a number of preliminary screens to potentially avoid full studies. [http://www3.dps.ny.gov/W/PSCWeb.nsf/96f0fec0b45a-3c6485257688006a701a/def2bf0a236b946f85257f71006ac98e/\\$FILE/21639312.pdf](http://www3.dps.ny.gov/W/PSCWeb.nsf/96f0fec0b45a-3c6485257688006a701a/def2bf0a236b946f85257f71006ac98e/$FILE/21639312.pdf)/Standardized Preliminary Screening - Template 2019-01-04.pdf

Supplemental Analysis (SA)

If a project is unable to pass the preliminary screening analysis, and the utility and applicant are unable to agree on necessary modifications, then a project may elect to proceed to the Supplemental Analysis (SA) or CESIR. If the applicant chooses supplemental analysis, the applicant must pay the supplemental analysis fee of \$2,500 and the utility is provided up to 20 business days to perform screens G, H and I. At this point, the project will either pass the applicable technical screens and execute an interconnection agreement or fail the technical screens and request a supplemental analysis meeting. Similar to the preliminary screening meeting, the utility and applicant may come to an agreement on modifications that avoid moving into a complete CESIR study described below. Applicants have 10 business days to request a SA meeting, and 15 business days after the meeting to accept the modifications or proceed to a CESIR.

Coordinated Electric System Interconnection Review (CESIR)

If the developer is unable to modify the project to address the interconnection concerns after a preliminary analysis, the applicant may forego a supplemental analysis and proceed directly to a CESIR. Alternatively, a CESIR is required if the applicant cannot address the utility's concerns in the Supplemental Analysis. Within five business days of an applicant requesting a CESIR, the utility will return a cost estimate to perform the study. The study lasts up to 60 business days and determines the interconnection work and estimated costs with interconnecting a project. Within 90 business days of receiving CESIR results from the utility, the applicant must either pay a minimum of 25% of the interconnection costs if the costs are equal to or greater than \$10,000; pay 100% of the interconnect costs if the cost is less than \$10,000; or return a signed interconnection agreement if there are no costs required for interconnection. If none of the three actions are completed within 90 business days, the project may be cancelled and removed from the interconnection queue. In the case of making a 25% payment, the additional payment of 75% of the interconnection costs is due within 120 business days of the 25% payment date.

Appendix K

Appendix K collects additional energy storage specific information for the SIR. This gives developers the opportunity to influence their interconnection agreement and, potentially, interconnection costs, by specifying operational characteristics of a project. Operational limitation can represent a balance of providing operational flexibility by studying worst-case scenarios versus avoiding the need for costly upgrades by imposing operational limitations. An example of an operational limitation is a limitation on when a system could charge or discharge. The Appendix has two sections. The first section, Application Requirements, includes information on the system. For instance, electrical properties and whether it is stand-alone or hybrid, Market Participation, and System Operating Characteristics. The second section is optional and allows the applicant to provide additional information on inverter functions, such as smart inverter functions and standards as well as communications protocols. By providing the utility with the appendix K information, the developer clearly demonstrates the actual manner in which the system will operate, which enables the utility to determine how the interconnection will impact the grid. Developers with projects that are seeking to modify their operational characteristics are required to resubmit projects via the SIR process if the modifications are deemed material.

Utility Interconnection Process

For projects larger than 5 MW that are both distribution connected and not on a FERC jurisdictional circuit, the project will go through the utility interconnection (non-SIR) process. Projects larger than 5 MW intending to participate in retail rates also will go through the utility interconnection (non-SIR) process regardless of the point of interconnection. This process can vary by project type and service territory. Contact information for all utility interconnection ombudsmen is available in the table at the end of this document. Developers should contact the utilities directly to ensure they understand the interconnection process for the applicable utility.

Con Edison published a guide on their interconnection process for large projects available [online](#).

Specifications from National Grid are in Electric System Bulletin No. 756 available [online](#).

NYISO Small Generator Interconnection Procedures (SGIP)

Small Generator Interconnection Procedures will apply to projects equal or less than 20 MW that are located on the NYS Transmission System or on FERC jurisdictional distribution circuits and intend to participate in the NYISO’s markets. Projects must have site control to enter the NYISO queue and are given a number based on the date of the interconnection request. The NYISO queue is not a hard queue, and projects can advance on different schedules than other projects. There are two possible paths for a project in SGIP, the fast track process and the normal study process.

Fast Track Process

Projects are eligible for the fast track process according to the following table.

Fast Track Eligibility for Inverter-Based Systems		
Line Voltage	Fast Track Eligibility Regardless of Location	Fast Track Eligibility on a Mainline and ≤ 2.5 Electrical Circuit Miles from Substation
< 5 kV	≤ 500 kW	≤ 500 kW
≥ 5 kV and < 15 kV	≤ 2 MW	≤ 3 MW
≥ 15 kV and < 30 kV	≤ 3 MW	≤ 4 MW
≥ 30 kV and ≤ 69 kV	≤ 4 MW	≤ 5 MW

An applicant has 10 business days to submit all required materials for fast track process eligibility. The NYISO and CTO (Connecting Transmission Owner) will make a reasonable effort to perform the fast track analysis within 15 business days. If a project passes all applicable screens, the NYISO and applicant will execute an interconnection agreement. If it does not pass all applicable screens, then the NYISO and CTO will determine if the system can interconnect reliably. If it can, then an interconnection agreement will be executed. If not, the project will proceed to a customer options meeting to review what further steps are necessary to allow the facility to interconnect safely and reliably. From this meeting, a project will proceed in one of three ways:

- CTO offers to make minor modifications (the customer will cover associated costs)
- NYISO offers to perform supplemental review (to be completed in 30 business days) and provides a good faith cost estimate of the review
- The project proceeds to the normal SGIP study process

Normal Study Process

There are three parts to the normal study process: Optional Feasibility Study (OFES), System Impact Study (SIS), and Facilities Study (FS). A customer may opt to waive the OFES; the other two studies are required although they can be waived upon the mutual agreement of the customer, NYISO, and CTO. The Feasibility Study focuses on the local system and includes a preliminary non-binding cost estimate for System Upgrade Facilities (SUF), CTO Interconnection Facilities (CTOIF), and distribution upgrades. The System Impact Study expands the study of reliability and will update the cost estimate for SUFs, CTOIF and distribution upgrades. The Facility Study determines binding cost estimates and allocations for the SUFs. Upon the completion of the Facility Study the NYISO, CTO, and customer will execute a three-party interconnection agreement. It is important to note that projects greater than 2 MW seeking to participate in the capacity market will need to go through the class year process (described in a later section). Also, if non-local SUFs are identified, the project will need to go through the Class Year Facilities Study and not a stand-alone facilities study.

Common NYISO Acronyms	
CRIS	Capacity Resource Interconnection Service
CTO	Connecting Transmission Owner
CTOAF	CTO Attachment Facilities
CTOIF	CTO Interconnection Facilities
ERIS	Energy Resource Interconnection Service
FES	Feasibility Study
FS	Facilities Study
FSA	Facility Study Agreement
LFIP	Large Facility Interconnection Procedure
OC	Operating Committee
OFES	Optional Feasibility Study
SDU	System Deliverability Upgrade
SGIP	Small Generator Interconnection Procedure
SIS	System Impact Study
SRIS	System Reliability Impact Study
SUF	System Upgrade Facilities
TPAS	Transmission Planning Advisory Committee

Additional Deliverability Study for Capacity Market Participation

The outcome of the SGIP process results in “Energy Resource Interconnection Service (ERIS)” rights that allow a project to participate in the NYISO energy and ancillary services markets. For a project to participate in the NYISO capacity market it must also have “Capacity Resource Interconnection Service (CRIS)” rights. To achieve CRIS rights, any project greater than 2 MW must undergo a deliverability study as part of the Class Year Process described in a later section. The NYISO is presently planning to introduce an alternate path to secure CRIS rights through a “mini deliverability study” that will likely be implemented in the spring of 2020.

NYISO Large Facility Interconnection Procedures (LFIP)

The NYISO's Large Facility Interconnection Procedures apply to any facilities greater than 20 MW that are proposed to interconnect to any system (distribution or transmission) and intend to participate in the NYISO's markets. All projects more than 20 MW are required to enter the NYISO's class year process as a part of their interconnection process. Interconnection of a 20+ MW project could take up to approximately two years and may require more than \$100,000 in deposits. The NYISO is proposing tariff changes to speed up the process. Existing generators seeking to increase the size of their interconnection will also be required to go through LFIP if the modifications are deemed to be 'material'. See [Attachment X](#) (page 1143 in the PDF) for more information.

The interconnection process begins with an applicant submitting a Large Facility Interconnection Request (LFIR), in the form of Appendix 1, and a \$10,000 non-refundable deposit to the NYISO. The developer must submit a separate LFIR and deposits for each application, even if they are at the same site. The CTO and NYISO will then evaluate the application for completeness, and within 10 business days the NYISO will notify the applicant about their queue position and the completeness of their application.

Scoping Meeting

Within 30 days of determining an LFIR is valid, the NYISO, CTO, and applicant will have a scoping meeting where necessary NDAs will be executed and the CTO will provide relevant transmission data and general issues that may impact the project. Within five business days of the scoping meeting, the applicant must notify the NYISO of their intention to proceed to the OFES or forego the OFES and proceed directly to SRIS.

Optional Feasibility Study

The OFES is a preliminary evaluation of a project's impacts on the existing electric power system. It only evaluates a project's ERIS and can evaluate multiple proposed points of interconnection. An applicant will need to provide either a \$10,000 or \$60,000 deposit, depending on the scope of the analyses requested, within 15 business days of receiving the NYISO's non-binding cost estimate for the study. The developer is responsible for all costs associated with the OFES.

The NYISO will provide a study scope to the CTO and applicant for signatures, and then proceed with the study once all required technical data and signatures are received. The NYISO will then perform the studies and schedule a study report meeting with the applicant, CTO, and any affected transmission operators. This study report meeting will focus on reviewing the OFES and identifying the scope and arrangements for the SRIS (System Reliability Impact Study).

System Reliability Impact Study

The SRIS is intended to evaluate the impact of a project on the existing electric system including future firm transmission projects. If the OFES was performed, the SRIS will re-evaluate and revise, as necessary, system upgrades and the non-binding good faith estimates of the cost and time to construct the required facilities. If the OFES was not performed, the SRIS would be the first study for the project and would include the development of the conceptual design for the proposed interconnection if such design was not previously specified by the developer, as well as identifying necessary upgrades and providing the non-binding good faith estimates of the cost and time to construct the required facilities.

The applicant must provide a \$120,000 study deposit (an optional \$30,000 deposit applies if the applicant is seeking a preliminary nonbinding deliverability evaluation of CRIS) within 15 business days of receiving the NYISO's good faith cost estimate of the study costs. The NYISO will develop a scope of the SRIS for approval by the CTO, applicant, and affected transmission operators. The NYISO will then present the SRIS scope to the Transmission Planning Advisory Committee (TPAS) and the Operating Committee (OC) for approval. Upon receipt of this approval, the study will commence. Projects must demonstrate site control to proceed with the SRIS.

Upon completion of all the study tasks, including initial review of the draft study report and documentation, NYISO will provide the draft SRIS report to the Developer and CTO for comment. After any comments have been reviewed and incorporated, NYISO will schedule a study results meeting with the Developer and CTO. After the study report meeting, the NYISO will submit the SRIS for review by TPAS and approval by the OC. The developer is expected to be represented at both the TPAS and OC meetings where their project's SRIS reports are reviewed/approved.

Optional SRIS

The Optional System Reliability Impact Study (OSRIS) is designed to give developers the option to continue evaluating alternative points of interconnection through the SRIS stage of the interconnection process. This study will be performed in parallel with the SRIS, and a developer must decide which SRIS will be submitted to the OC for approval. Each SRIS requires a separate study, scope, and deposit. Applicants must decide to pursue an OSRIS before finalization of the SRIS scope.

NYISO Class Year Interconnection Facilities Study (Class Year Facilities Study or CYFS) — The NYISO's Class Year Study is necessary for all projects greater than 20 MW or Small Generation projects that result in non-Local System Upgrade Facilities in order to be reliably interconnected to the system. Projects that are greater than 2MW and want to secure Capacity Resource Interconnection Service (CRIS) to participate in the NYISO's capacity market are also required to go through the Class Year Study for a Deliverability Study. In order to be eligible to enter the class year, a project needs to have Operating Committee approval of the System Reliability Impact Study (SRIS) and satisfaction of a regulatory milestone, as described in the NYISO's tariff. A project does not need to meet the regulatory milestone requirements if solely requesting CRIS rights. The steps in the class year process are as follows:

1. Preparation/Execution of Facilities Study Agreement (FSA)
2. Performance of the Class Year Facilities Study (CYFS) by the NYISO in accordance with the tariff (this may include several rounds of analyses should projects not accept their cost allocation)
3. A meeting with the NYISO, CTO, Affected Transmission Owners, and the Applicant to review CYFS results
4. Transmission Planning Advisory Subcommittee (TPAS) review of the CYFS results and Operating Committee approval
5. Decision and settlements
6. Payment and security postings for accepted system upgrade cost allocations

The CYFS consists of several studies that are grouped into two parts. The part 1 studies are focused on the local impacts of a project's interconnection and are performed independently of one another. Both local SUFs (Supplemental Utility Facilities) and CTOAFs (Connecting Transmission Owners' Attachment Facilities) cost estimates are developed in the part 1 studies. The NYISO, CTO, or consultants may be involved in the part 1 studies. The part 2 studies include the Annual Transmission Baseline Assessment (ATBA), the Annual Transmission Reliability Assessment (ATRA), and the Class Year Deliverability Study.

- ATBA evaluates the pre-existing baseline system before the Class Year projects are included and identifies any SUFs and associated cost estimates for that system.
- The ATRA evaluates the condition with the Class Year projects added to the baseline system, identifies the SUFs required for the Class Year projects collectively, and then performs a design, preliminary engineering, and estimation of cost and time to construct for each SUF.
- The ATRA addresses all SUFs required for the Class Year projects, including SUFs identified in the part 1 studies.

The ATBA and ATRA determine the cost allocation of the SUFs between the Transmission Owners and the Class Year project Developers, and the ATRA determines the cost allocation among the CY Developers, in accordance with Attachment S.

The Class Year Deliverability Study (CYDS) evaluates the deliverability of CRIS requested for the Class Year Projects (including any CRIS only projects), determines the amount of requested CRIS that would be deliverable without SDUs, if any, and identifies the SDUs that would be required to make the requested CRIS fully deliverable. For each SDU identified, a detailed study is performed, as necessary, to develop a design and cost estimate for the SDU unless the applicable Class Year CRIS Projects elect not to pursue the SDU. Similar to the ATBA and ATRA performed to determine the cost allocation for SUFs, the CYDS includes an ATBA-D and ATRA-D that are used to determine the cost allocation for SDUs to and among the CY Developers in accordance with Attachment S.

Steps in NYISO Interconnection Process	
1	Scoping Meeting Pending
2	Feasibility Study Pending
3	Feasibility Study in Progress
4	System Reliability Impact Study Pending
5	System Reliability Impact Study in Progress
6	System Reliability Impact Study Approved
7	Facilities Study Pending
8	Rejected Cost Allocation/Next Facilities Study Pending
9	Facilities Study in Progress
10	Accepted Cost Allocation/Interconnection Agreement in Progress
11	Interconnection Agreement Completed
12	Under Construction
13	In Service for Test
14	In Service Commercial

Long Island Interconnection (0 KW to 10 MW)

The Long Island interconnection process is governed by the Smart Grid Small Generator Standardized Interconnection Procedures (SGIP). PSEG Long Island's SGIP should not be confused with the NYISO process bearing the same name. The SGIP is administered by PSEG Long Island, as the service provider and agent for LIPA, and provides a framework for processing applications for interconnection to LIPA's distribution system for:

- Interconnection of new distributed generation facilities with an AC nameplate rating of less than 10 MW (aggregated on the customer side of the point of common coupling (PCC)).
- Interconnection of new energy storage system (ESS) facilities with an AC inverter/converter nameplate rating of 10 MW or less aggregated on the customer side of the PCC that may be stand-alone systems or combined with existing or new distributed generation (Hybrid Projects); maximum export capacity onto the utility distribution system is capped at an AC nameplate rating or AC inverter/converter nameplate rating of 10 MW or less.

Refer to [PSEG Long Island's SGIP process](#) for additional information.

The PSEG Long Island interconnection application requires a \$750 fee, which must be submitted with the application materials.

An applicant can request that PSEG Long Island return a pre-application report, which will be returned to the applicant within 10 business days. This is a non-binding report and the applicant has 15 business days to determine whether to proceed to the complete application process.

The application package for distributed resource interconnection on Long Island must include the standardized contract, authorization letter, and the standard application form. PSEG Long Island will notify all applicants of missing materials in their application package within 10 business days.

Similar to the SIR in other utilities, PSEG Long Island will perform a preliminary screening analysis (in accordance with Appendix G) and if a project passes all applicable technical screens, return an executed standard interconnection agreement. If it does not, PSEG Long Island will have a meeting with the applicant to determine whether modifications could obviate the need for a supplemental analysis.

Projects have 10 business days after the meeting to notify PSEG Long Island of their intention to: (a) proceed to the supplemental screening analysis, (b) bypass the supplemental screening and proceed directly to a full CESIR, or (c) withdraw their interconnection application.

Applicants that proceed to the supplemental screening analysis shall provide a nonrefundable fee of \$2,500 and be responsible for costs up to a maximum of \$5,000. PSEG Long Island will complete the supplemental screening analysis within 20 business days. If a project passes all applicable technical screens (S.1 through S.13), PSEG Long Island will return an executed interconnection agreement within 15 business days. If it does not, an applicant can elect to: (a) have a meeting with PSEG Long Island, (b) proceed to a full CESIR, or (c) withdraw their interconnection request.

For projects that proceed to a full CESIR, PSEG Long Island will return a cost estimate. The applicant has 10 business days to accept this cost estimate or the project will be removed from the interconnection queue. Applicants must submit a complete detailed interconnection design package, proof of site control (see Appendix H), advance payment of CESIR study costs, and the contact information for the individual responsible for answering questions. PSEG Long Island will notify an applicant within 10 business days of any missing materials. Once all materials are received, PSEG Long Island will complete the CESIR study within 60 business days. PSEG Long Island will provide, in writing, their analysis of the system impacts of a proposed interconnection and a cost estimate for interconnecting the system. Upon payment of a 30% deposit for the interconnection costs, PSEG Long Island will begin construction. All payments must be made within 30 days of receiving an invoice from PSEG Long Island.

Requirements for Generating Facility Interconnection to LIPA Transmission System (LGIP) – Projects greater than 10 MW

Projects interconnecting to Long Island’s Transmission system will need to follow the NYISO’s interconnection procedure. In some cases, LIPA will have additional reliability concerns that will be considered during the interconnection process. Developers are encouraged to contact PSEG Long Island staff early in this process.

Contact Information

Company/Entity	Contact Name	Email
Con Edison	Joe White*	whitejoe@coned.com
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* Denotes Utility Distributed Generation Ombudsman

** Denotes New York State Distributed Generation Ombudsman Council Co-Chair



NYSERDA

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New York State Energy Research and Development Authority

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