



February 20, 2026

**SENT VIA ELECTRONIC FILING**

Hon. Michelle L. Phillips  
Secretary to the Commission  
New York State Public Service Commission  
Agency Building 3  
Albany, NY 12223-1350  
E-mail: [Secretary@dps.ny.gov](mailto:Secretary@dps.ny.gov)

Re: Case 24-E-0621 – In the Matter of Modifications to the New York State Standardized Interconnection Requirements and Application Process for New Distributed Generators and/or Energy Storage Systems 5 MW or Less Connected in Parallel with Utility Distribution Systems.

Dear Secretary Phillips:

As authorized in the Public Service Commission’s (Commission) Order on Interconnection Queue Management, issued in the above-referenced proceeding on January 23, 2026 (the Order), Department of Public Service (DPS) Staff hereby provides the following guidance to resolve interpretive questions arising under the Order and the Standardized Interconnection Requirements (SIRs).<sup>1</sup>

At the February 18, 2026 meeting of the Interconnection Policy Working Group participants raised questions regarding how applications that trigger “Distribution and Sub-transmission Lines and Underground Secondary Network Upgrades” should be treated under Appendix M to the SIRs. Following the meeting, a developer asked DPS Staff about the treatment of projects assigned such upgrades that opt out of cost sharing, as authorized by the SIRs.

Having considered the questions raised, DPS Staff interprets the SIRs and Appendix M as requiring the utilities to manage projects involving the above-described upgrades as follows:

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<sup>1</sup> The New York State SIRs apply to new distributed generators and/or energy storage systems sized at 5 megawatts or less that connect in parallel with utility distribution systems. The current version of the SIRs is available on the Distributed Generation DPS webpage: <https://dps.ny.gov/distributed-generation-information>.

1. Applicants that opted out of cost sharing pursuant to the SIRs prior to the effective date of Appendix M and have commenced construction shall be scheduled for construction as Group A projects.
2. Other applicants that have not opted out shall be scheduled pursuant to the provisions of Appendix M applicable to Group B projects.

In accordance with the authority provided in the Order, the utilities shall comply with this determination in administering queue management under Appendix M and the SIRs. Parties who dispute DPS Staff's determination may seek recourse by filing a petition with the Commission.

Sincerely,

Elizabeth Grisaru  
Senior Advisor for Policy