



Consolidated Edison Company of New York, Inc.
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MEMO IN SUPPORT

- **Support S.8512-B (Krueger) / A.9111-B (Gallagher) The Solar Up Now NY Act (“SUNNY” Act).**

The Consolidated Edison Company of New York, Inc.¹ (“Con Edison”) supports this legislation which amends the Public Service Law to create a streamlined framework for portable solar generation devices by exempting them from standard interconnection and net metering requirements unless the customer voluntarily opts in, while requiring only a simple notification to the utility.

As a regulated electric utility serving New York customers, Con Edison believes this legislation strikes an appropriate balance. The bill aligns with enabling greater customer access to small-scale clean energy solutions while continuing to uphold essential standards for safety and grid reliability. Because these portable solar generation devices are very small, they pose minimal engineering or grid impact risk. Requiring certification from Underwriters Laboratory (“UL”) or equivalent certification further addresses key safety and power-quality concerns that utilities prioritize.

The legislation also establishes a simple registration process that can be handled efficiently through our existing PowerClerk system. This provides utilities with the basic visibility needed for operational awareness without imposing any significant burden on customers. Due to the limited size of the devices and the presence of UL certification, there is no need for engineering reviews, grid upgrades, study fees, or detailed site plans. In addition, our advanced metering infrastructure (“AMI”) smart meters are already capable of handling any potential export without technical issues, which means concerns such as meter rollback are not applicable to this legislation.

This targeted, practical approach removes unnecessary regulatory hurdles for customers who want convenient, portable clean energy options. At the same time, it safeguards the reliable operation of the electric grid. Con Edison views the proposal as a sensible step forward that benefits New Yorkers seeking cleaner energy choices while preserving the integrity of our shared energy system.

For the forgoing reasons, Con Edison supports the enactment of this legislation.

¹ Con Edison Company of New York is one of the nation's largest investor-owned energy companies, providing electric, gas, and steam service to over three million customers in New York City and Westchester County.

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