



April 22, 2024

VIA ELECTRONIC MAIL

New York City Department of Buildings
Office of the General Counsel
280 Broadway, 7th Floor
New York, NY 10007
dobrules@buildings.nyc.gov

Re: Amendment of Rules Relating to Property Tax Abatement for Installation of Solar Electric Generating System or Electric Energy Storage Equipment

Dear New York City Department of Buildings (DOB),

Thank you for issuing a Notice of Public Hearing and Opportunity to Comment on Proposed Rules regarding §105-02, Amendment of Rules Relating to Property Tax Abatement for Installation of Solar Electric Generating System or Electric Energy Storage Equipment.

New York Solar Energy Industries Association (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 solar energy and energy storage deployment in New York State through engagement on key legislative, regulatory, and statutory policy matters affecting these industries. Our members install thousands of solar PV systems in New York City each year, supporting progress toward the City and State's ambitious clean energy goals.

NYSEIA applauds the City of New York for working with the New York State Legislature to extend and expand the NYC Solar + Storage Property Tax Abatement by supporting the passage of [A06113B/S6640B](#) during the 2023-2024 legislative session. Strengthening New York City's local solar incentive is catalyzing in-City solar deployment, supporting progress toward NYC's clean energy, resiliency, environmental justice, economic development and workforce goals. This policy is also enabling NYC businesses and residents to leverage enhanced federal incentives through the Inflation Reduction Act, lowering the long-term cost of NYC's clean energy transition.

NYSEIA support's the DOB's proposed rules to amend §105-02. The proposed rules:

- Clearly state that solar **and/or energy storage** expenses are now eligible for the Property Tax Abatement.
- Clearly state that, starting on January 1, 2024, the limitation of one Property Tax Abatement per property is no longer in effect.

NYSEIA respectfully requests that the proposed rules be further amended to clearly state that:

- Solar parking canopy structures shall be considered a solar electric generating system [for the purposes of this subdivision].

Adding this language will ensure that the DOB rules reflect the language in the law, and that all relevant applications for solar parking canopy projects are considered eligible expenses for the Property Tax Abatement.

NYSEIA appreciates the DOB's important work advancing safety and sustainability in NYC, and we thank you for the opportunity to provide input on this important matter.

Sincerely,

A handwritten signature in cursive script that reads "Noah Ginsburg".

Noah Ginsburg
Executive Director
New York Solar Energy Industries Association