



June 26, 2022

Draft Scoping Plan Comments  
NYSERDA  
17 Columbia Circle, Albany, NY 12203

**Re: Climate Action Council Draft Scoping Plan**

Dear Chair Harris and Chair Seggos:

Borrego appreciates the opportunity to submit comments in response to the Climate Action Council Draft Scoping Plan (“Draft Plan”). Borrego is a leading solar and storage development, EPC, and O&M provider in NY that has been active in the state’s renewable energy market since 2013. Borrego has developed and installed more community solar in NY than any other developer and currently has an active portfolio of distributed and utility scale solar, storage, and wind of over 500 MW across dozens of projects in various stages of maturity.

Borrego strongly supports the Draft Plan as a whole, but these written comments are limited to the elements related to renewable energy project development in the state. The provisions in the Draft Plan that will enable the development of renewable projects are critical for New York State to reach its nation-leading climate goals. Many of the needed renewable energy technologies are available today, and there are many companies, like ours, making significant investments in New York right now to deploy them. Simply put, deploying renewables is foundational to the success of this plan. Electrified transportation and buildings are greenest when the electricity they consume comes from clean renewable sources. And when we build renewable energy facilities, they displace traditional, greenhouse gas and particulate emitting power plants, reducing pollution and its devastating health impacts while also creating thousands of local, well-paying jobs that will be relevant for generations.

New York needs to advance a significant number of wind, solar, and battery projects into construction immediately and at an aggressive pace to achieve its CLCPA goals. The Draft Plan provides the state a perfect playbook to make that happen. To highlight a few of the most important recommendations:

- New York should continue to procure large scale renewables on an aggressive schedule while also improving the Value of Distributed Energy Resources tariff and extending successful state programs that have been critical to distributed renewable deployment, like NY-Sun and the storage Market Acceleration Bridge incentive programs.

30 Century Hill Drive, Suite 301  
Latham, NY 12110

[www.borregosolar.com](http://www.borregosolar.com)

**Borrego. Powering your growth.™**



- New York should create a robust, permanent program to support energy storage development, recognizing that energy storage is imperative for deploying renewables most efficiently and reliably.
- The Office of Renewable Energy Siting should continue to improve and streamline the process for cost-effective, timely, and environmentally responsible siting of projects, which deliver significant benefits to local communities.
- In addition to a better permitting process, renewable electricity developers need a more streamlined interconnection process at the NYISO for large scale projects and at the utilities for smaller, distributed energy resources.
- Significant and forward-looking planning and investment are needed in the transmission and distribution system to anticipate where electrification will create new load and to host all the renewables the state will need to decarbonize. We know NY's Public Service Commission is already hard at work at this and urge continued focus and timely approval of transmission and distribution upgrades.
- Finally, Borrego applauds the Climate Action Council for its commitment to climate justice. Borrego supports any effort that will achieve the state's climate goals and a just transition to clean energy.

To close, Borrego thanks the Climate Action Council for their efforts and good work. Borrego recognizes that implementing this aggressive plan will not be easy, but it is critically important. Borrego appreciate NY's focus and support and looks forward to continuing to do business in NY.

Sincerely,

Sam Jasinski

Director of Policy and Business Development  
Borrego Solar Systems, Inc.

30 Century Hill Drive, Suite 301  
Latham, NY 12110

[www.borregosolar.com](http://www.borregosolar.com)

**Borrego. Powering your growth.™**