

Sprocket Power is commenting from the perspective of an implementer of integrated demand side solutions that incorporate solar, battery storage, EV charging, advanced building controls and cloud-based facility management and optimization. These projects create “grid responsive” facilities able to participate in and benefit from Demand Charge reduction, Time of Use (TOU) rates, Demand Response and other current and future market mechanisms, creating superior outcomes for customer and grid alike. Our target customers are SMB customers that are historically underserved by these kinds of sophisticated, managed solutions, despite their economic benefit. Our comments underscore programs that are helpful in advancing these beneficial projects.

Comments:

- Managed and measured outcomes are highly valuable but rare in this customer base. Programs that promote oversight, like NYSERDA’s Real Time Energy Management (RTEM) program are beneficial in incentivizing the costs associated with connecting behind the meter DERs and managing and measuring performance over time. The validation of a state agency communicating about the benefits of these principles is an additional benefit provided by the RTEM program.
- Projects rely on commercially available technologies and are economically viable and financeable, when rebates, incentives and grid economics are incorporated. It is important that price signals that encourage demand-side flexibility and load shifting remain strong and predictable.
- The multiple incentive programs available for the projects described above create a complex and fragmented landscape for customers to navigate. This is a barrier to adoption that can be reduced by 1) identifying trusted outlets for customer education and 2) encouraging enhanced benefits to “bundling” multiple programs into projects. This would support program uptake and would speed adoption of beneficial solutions for all.