



New York Battery and Energy Storage Technology Consortium, Inc.

VIA ELECTRONIC FILING

January 8, 2019

RGGI Program
New York State Energy Research & Development Authority
17 Columbia Circle Albany, New York 12203
rggiprograms@nysesda.ny.gov

Dear Colleagues:

The New York Battery and Energy Storage Technology Consortium (“NY-BEST”) is pleased to submit these comments in response to the New York State Department of Environmental Conservation’s (DEC) and New York Energy Research Development Authority’s request for stakeholder input on the proposed New York’s Regional Greenhouse Gas Initiative (RGGI) Operating Plan Amendment for 2019.

The New York Battery and Energy Storage Technology Consortium (“NY-BEST”) is a not-for-profit industry trade association with a mission to catalyze and grow the energy storage industry and establish New York State as a global leader in energy storage. Our 160 member organizations include: technology developers ranging in size from global energy storage companies to small start-ups, manufacturers, project developers, project integrators, engineering firms, law firms, leading research institutions and universities, national labs and numerous companies involved in the electricity and transportation sectors.

NY-BEST commends the staff of the DEC and NYSERDA for their efforts in developing the RGGI Operating Plan Amendment and in recognizing the important role energy storage can play in improving the State’s electric grid and transportation systems. We appreciate the opportunity to provide our support for the Operating Plan Amendment and in particular the Energy Storage Program and ChargeNY Program elements of the Operating Plan Amendment.

NY-BEST and our members have been actively engaged in the State’s Reforming the Energy Vision (“REV”) initiative and its related proceedings since its inception and we have consistently highlighted the important role that energy storage must play in achieving the State’s goal to transform New York’s electric industry by creating market-based, increasingly efficient, clean, reliable, and customer-oriented industry. We also support the goals of the State’s Energy Plan and the Clean Energy Standard to generate 50 percent of the state’s



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electricity from renewable sources by 2030 and reduce greenhouse gas emissions by 40 percent by 2030 and 80 percent by 2050. Further, NY-BEST supports the State's goal to deploy 1500 MW of energy storage by 2025 and up to 3 GW of energy storage by 2030.

NY-BEST is gratified that the RGGI Operating Plan Amendment includes \$52.9 million for Energy Storage to support the programs and initiatives like those articulated in the New York Energy Storage Roadmap. As the Roadmap illustrated, energy storage is critical to transforming New York's electric grid, and meeting the State's renewable energy and climate goals. Energy storage technologies are non-emitting and commercially available and they contribute to carbon reduction goals. Energy storage is also critical to maximizing the energy and emissions reductions benefits provided by renewable energy resources. As intermittent renewable power sources like wind and solar provide a larger portion of New York's electricity, storage is needed to smooth and time-shift renewable generation and minimize curtailment. Storage will also allow New York to meet its peak power needs without relying on its oldest and dirtiest peak generating plants, many of which are approaching the end of their useful lives. As noted by Acelerex, in its modeling for the Roadmap, deploying 1500 MW of energy storage by 2025 will avoid "more than one million tons of CO₂ emissions over the life of the storage assets (estimated at 10 years). The carbon benefits from adding energy storage grow substantially as the state approaches higher levels of renewable generation that would otherwise be curtailed, especially at night. Charging the storage with off-peak renewable energy to discharge and displace fossil generation during peak periods of demand will provide a substantial benefit to the state's carbon footprint and air quality."¹ As such, NY-BEST believes the use of RGGI funds for energy storage programs is consistent with the goals and regulatory requirements of the RGGI program.

NY-BEST also supports the use of RGGI funds for the ChargeNY program, including funding clean transportation infrastructure, and the rebate program for plug-in electric vehicles. We see investment in clean transportation initiatives, such as these, as critical to reducing carbon emissions from the transportation sector. These and other bold transformative changes in the State's transportation system are necessary to achieve the State's greenhouse gas reduction goals.

¹ NY Energy Storage Roadmap and DPS and NYSERDA Staff recommendations, June 2018, p.5



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NY-BEST appreciates the opportunity to submit these comments and we look forward to working with DEC and NYSERDA on the implementation of these important programs.

Respectfully Submitted,

A handwritten signature in black ink, appearing to read "William Acker". The signature is fluid and cursive, with a long horizontal stroke at the end.

Dr. William Acker
Executive Director