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Regional Greenhouse Gas Initiative Programs  
New York State Energy Research & Development Authority  
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**The Port Authority of New York and New Jersey Supports Additional Funding for Entities Not Covered by the Market Acceleration Incentive under the Public Service Commission's Energy Storage Initiative**

The Port Authority of New York and New Jersey ("Port Authority") respectfully submits these comments on the 2019 Regional Greenhouse Gas Initiative (RGGI) Draft Operating Plan Amendment. The Port Authority supports the New York State Energy Research and Development Authority's (NYSERDA) proposal to repurpose \$52.9 million in RGGI funds towards deployment of energy storage (ES) with customers not covered by the Public Service Commission's ES incentive program.

The Port Authority has numerous facilities located throughout one of New York State's highest-value locations for distributed energy resources, and is best positioned to capitalize on the potential revenue streams from ES systems (DER), as identified in the *New York State Energy Storage Roadmap*. The Port Authority has investigated several project opportunities for energy storage deployments at its facilities and identified numerous instances in which ES could be beneficial to the Port Authority; these include ES for the purposes of supporting electrification of Port Authority transportation services, resiliency, and power quality improvements at critical infrastructure sites, and overall improving the economics of our DER projects. However, without access to the energy storage incentives available to other customers, it will be difficult to move forward with these projects in a fiscally responsible manner given the current deployment costs and anticipated market revenues for ES. The Port Authority, hence, fully supports NYSERDA's repurposing of RGGI funds to allocate \$52.9 million towards energy storage deployments for entities not covered by the Commission's programs.

The Port Authority appreciates the opportunity to provide these comments and looks forward to working with NYSERDA and other stakeholders to achieve the State's ES goals.

Respectfully submitted,



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Director  
Office of Environmental and Energy Programs