

George Latimer
County Executive

January 8, 2019

RGGI Programs
New York State Energy Research & Development Authority
17 Columbia Circle
Albany, NY 12203

Re: Westchester County Supports Additional Funding for Entities Not Covered by the Market Acceleration Incentive under the Public Service Commission's Energy Storage Initiative

To Whom It May Concern,

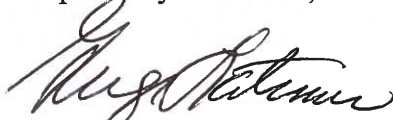
Westchester County respectfully submits these comments on the 2019 Regional Greenhouse Gas Initiative (RGGI) Draft Operating Plan Amendment. Westchester supports the New York State Energy Research and Development Authority's (NYSERDA) proposal to repurpose \$52.9 million in RGGI funds towards deployment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

Westchester County is a high value location that is one of the best positioned to capitalize on the potential revenue streams from ES systems, as identified in the *New York State Energy Storage Roadmap*. The County has investigated several project opportunities for energy storage deployments at its facilities and identified numerous instances in which ES could be beneficial to the County and its constituents; these include ES for the purposes of supporting electrification of County transportation services, resiliency, and power quality improvements at critical infrastructure sites such as waste water treatment facilities, 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. Westchester County, hence, fully supports NYSEDA's repurposing of RGGI funds to allocate \$52.9 million towards energy storage deployments for entities not covered by the Commission's programs.

Westchester County appreciates the opportunity to provide these comments and looks forward to working with NYSEDA and other stakeholders to achieve the State's ES goals.

Respectfully submitted,



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Westchester County Executive

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