



New York Battery and Energy Storage Technology Consortium, Inc.

VIA ELECTRONIC FILING

December 27, 2023

Re: Draft 2024 RGGI Operating Plan Amendment Comments

To Whom It May Concern:

The New York Battery and Energy Storage Technology Consortium (“NY-BEST”) submits these comments in relation to NYSERDA Staff’s Draft 2024 RGGI Operating Plan Amendment issued on December 8, 2023.

We appreciate the opportunity to share these comments. We can be reached at info@ny-best.org or by phone at 518-694-8474. Thank you.

Sincerely,

Dr. William Acker
Executive Director

NY-BEST Comments

Draft 2024 RGGI Operating Plan Amendment Comments

Introduction

The New York Battery and Energy Storage Technology Consortium (“NY-BEST”) submits these comments in relation to the Draft 2024 RGGI Operating Plan Amendment issued on December 8, 2023

NY-BEST is a not-for-profit industry trade association with a mission to grow the energy storage industry in New York. We act as a voice of the energy storage industry for more than 180 member organizations on matters related to advanced batteries and energy storage technologies. Our membership includes global corporations, start-ups, project developers, leading research institutions and universities, and numerous companies involved in the electricity and transportation sectors.¹

NY-BEST recently took the role as lead entity for the Supply Chain Development component of the US EDA-funded New Energy New York (“NENY”) initiative in the Southern Tier in partnership with Binghamton University. This focused effort seeks to grow the participation of the State’s numerous manufacturing firms in opportunities afforded by the fast-growing the battery and energy storage system markets worldwide and in the State, and further, to attract new businesses to the State to engage with and become part of the supply chain ecosystem. The success of the NENY program to date shows high promise for expanded efforts in this area, and these comments reflect a focus on our support for allocation of RGGI funding to support related activities. NY-BEST also suggests that RGGI funds be allocated to support energy storage retail incentive funding for projects on Long Island to address an emerging critical gap in New York State’s energy storage deployment plans.

Comments and Recommendations

NY-BEST appreciates the NYSERDA Staff’s thoughtful and well-reasoned approach to this matter as evidenced throughout the process and in the discussion and recommendations embodied in the draft plan. Our thoughts and comments regarding specific elements of the operating plan are outlined below.

Clean Energy Business Development

This Amendment allocates a total of \$5.4 million in FY24-25, which will support supply chain analysis and forums, clean energy recruiting campaigns, planning assistance, and analytical

¹ NY-BEST comments represent the interests of the organization as a whole and not the views of any one particular member. Our members have diverse interests and the organization’s views are intended to be reflective of the energy storage industry collectively and to support the organization’s goals to grow the energy storage industry in New York.

work to expand NYS manufacturers and suppliers for products and solutions that reduce greenhouse gas emissions.

NY-BEST strongly supports this allocation as an important step toward further development and expansion of the State’s ongoing efforts to build a clean energy economy and ensure that New York State based firms and individuals benefit as the State . As NY-BEST has engaged in the development of a supply chain for batteries and energy storage—most recently as the lead entity for the NENY Supply Chain Development program—the impressive scale of the growth potential for New York State’s manufacturing firms to grow their operations and pivot to production of clean energy products has become ever more apparent. The proposed funding in this area will both inspire and guide efforts by the numerous economic development agencies and offices across the State to further support the ongoing transition and engage additional firms. Of particular note is the impact this funding and the resultant activity can be expected to generate in Disadvantaged Communities. The NENY Supply Chain efforts to date serve to validate the projected impact, as a majority of the work through the current efforts has benefited firms and individuals in DACs—and much work remains to be done.

Domestic production of energy storage products and their effective deployment are of critical importance to meeting our climate goals for numerous reasons:

1. The New York State Climate Action Council Scoping Plan (Scoping Plan)² establishes the vital need for energy storage resources to effectively integrate high renewables to have a cost effective, reliable, de-carbonized electric system. New York State needs to ensure that there are not geographic gaps in the deployment of energy storage and that the supply chain give us access to cost effective products.
2. Low carbon production of energy storage equipment – producing in NY with clean electricity will have less carbon emissions than production overseas with high carbon emission energy.
3. Local supply chain reduces carbon emissions – In addition to the advantages of lower carbon intensity manufacturing, domestic manufacturing reduces carbon emission both by requiring less transport of products and by virtue of using cleaner transportation systems.
4. Importance of realizing the economic benefits of the energy transition. As stated in the scoping plan: “New York will re-tool existing businesses; attract new businesses; and seek opportunities to manufacture, assemble, and distribute the equipment and components that are needed to realize sector-specific outcomes and provide jobs for New Yorkers. For New York, this transition is a once-in-a-generation opportunity to implement decarbonization policies that bolster industry retention while providing sustainable economic development and growth.”³

² New York State Climate Action Council Scoping Plan Full Report December 2022

³ Ibid p.8

Energy Storage Long Island Retail Incentive

Although the 6 GW Energy Storage Roadmap proposed by NYSERDA and DPS staff calls for the creation of the statewide energy storage retail incentive program, there is currently uncertainty about LIPA's commitment and ability to fund such a program in the near term. Given the critical role for energy storage in modernizing Long Island's electric grid, reducing grid congestion and maximizing renewable energy benefits, NY-BEST's urges NYSERDA to consider allocating RGGI funds to support energy storage retail incentive funding for projects on Long Island. Such an allocation would be consistent with the previous use of RGGI funding under the State's first Energy Storage Roadmap that supported market acceleration bridge incentives for retail energy storage projects on Long Island.

Conclusion

NY-BEST appreciates the opportunity to participate in this process and commends NYSERDA Staff for their thoughtful approach to these Draft 2024 RGGI Operating Plan recommendations. We appreciate your consideration of these comments and stand ready to assist Staff should you have any questions about our comments and recommendations.