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**New York State Energy Research and Development Authority**

17 Columbia Circle | Albany, NY 12203  
[rggiprograms@nyserda.ny.gov](mailto:rggiprograms@nyserda.ny.gov)

**Re: NineDot Energy Comments on 2022 Draft RGGI Operating Plan Amendment**

Dear Doreen Harris, Pam Poisson, John Williams, and NYSERDA members,

NineDot Energy appreciates the opportunity to provide these brief comments to the NYSERDA Board of Directors with regards to amending the 2022 RGGI Operating Plan amidst the revised FY 21-22 revised budget and higher alliance prices.

NineDot Energy is a leading community-scale, clean energy developer with a growing portfolio of projects across a range of technologies. NineDot is creating innovative energy solutions that support a more resilient electric grid, deliver economic savings, and reduce carbon emissions. We plan to develop, build and operate more than 400 megawatts of clean energy systems by 2026 that will strengthen the local power grid infrastructure and provide clean, reliable, and resilient power to tens of thousands of New York homes and businesses. We strongly support New York State's mission to achieve 100% clean energy by 2035 and goal of 6,000 megawatts of energy storage deployment by 2030.

Based on NineDot's participation in energy storage programs across the New York, particularly in the Value of Distributed Energy Resources (VDER) Value Stack and ConEdison demand-response (DR) programs, we see three key components that NYSERDA should ensure are included in the expanded RGGI spending program:

1. **Allocation of \$20 million to NYC Retail Storage Incentive Program (RSIP) Block 5 at or above previous award levels is necessary**

NineDot applauds NYSERDA's attention to removing barriers to electric energy storage (ESS) in New York City (NYC). We appreciate the recognition there is still a 'bridge' to cross or 'missing money' needed to ensure ESS projects cross into a self-sustaining market. NYSERDA should maintain Block 4 funding levels of at least \$100/kWh in order to achieve the capacity deployment goals as stated. NYC's energy storage market has been especially vulnerable to a volatile supply chain, rising labor costs, record high property costs, and general inflation which merits maintaining at least previous funding levels.

2. **Allocate an additional \$15 million NYC RSIP contribution to Climate Justice**

NineDot recommends an additional \$15 million of funding be made available for existing and future energy storage systems (including Blocks 1-5) that benefit the state's Climate Justice goals. Namely, Community Distributed Generation (CDG) or Remote Crediting (RC) retail energy storage solution with 40% or more subscribers (satellite customer) within Disadvantaged Community (DAC) should qualify for a \$50/kWh Inclusive Climate Justice Adder (ICJA), modeled after a similar NYSERDA program for community solar. An ICJA for ESS will meet NYSERDA's desire to provide appropriate support for Climate Justice. Note that ICJA should be applicable to previous NYC RSIP awards that commit to DAC subscriptions.

3. **ChargeNY funding carve-out for Vehicle-to-Grid (V2G) technologies**

NineDot recommends that the ChargeNY program provide a \$25 million carve-out specifically for bidirectional-enabled EV charging projects. Qualifying technologies should receive funding to help attract more OEM and developer investment as these budding charger technologies reach the market. A ChargeNY V2G program should apply to Level 2 (L2) and Level 3 (L3) charger projects so long as it enables vehicles to export into various distribution grid programs (e.g., VDER and DR). In addition to public chargers within DAC communities, any non-public charger that supports clean transportation should also qualify for the V2G funding. Broadening qualified chargers to include public bus and other transportation depots, carshare/cab/limousine/rental hubs, or any multi-family residential parking facility within DAC zones will directly and indirectly benefit such communities. This will also help the state attract and create innovative

financing products that increase adoption of clean energy vehicles spurring further carbon abatement in the state.

We are very supportive of the innovative and forward looking strategy to expand planned programs - notably with regards to the Retail Storage funding program. We propose the above program tweaks and clarifications to further strengthen the amendment ahead of NYSERDA's Board of Directors meeting scheduled June 28. Again, NineDot applauds NYSERDA's attention on removing barriers to electric storage and EV charger deployment in NYC. We thank you for your time and consideration of this matter. Please contact me if you have any questions.

Respectfully,

A handwritten signature in black ink that reads "Adam". The letters are cursive and fluid.

Adam B. Cohen, Ph.D.