

## JACOB K. JAVITS CONVENTION CENTER OF NEW YORK®

The Jacob K. Javits Convention Center Supports Additional Funding for Entities Not Covered by the Market Acceleration Incentive under the Public Service Commission's Energy Storage Initiative

The Jacob K. Javits Convention Center ("Javits Center") respectfully submits these comments on the 2019 Regional Greenhouse Gas Initiative (RGGI) Draft Operating Plan Amendment. The Javits Center 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 Javits Center is a flagship facility located in one of New York State's highest-value locations for distributed energy resources (DER), and is best positioned to capitalize on the potential revenue streams from ES systems, as identified in the *New York State Energy Storage Roadmap*. The Javits Center has investigated project opportunities for energy storage deployments at its facility, and strives to lead by example of the future of sustainable energy development in the City and State of New York. However, without access to the energy storage incentives available to other customers, it will be difficult to move forward with such projects in a fiscally responsible manner given the current deployment costs and anticipated market revenues for ES. The Javits Center, 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 Javits Center 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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