October 10, 2018

Via Electronic Filing

Honorable Kathleen H. Burgess, Secretary to the Commission
New York State Public Service Commission
Empire State Plaza, Agency Building 3
Albany, NY 12223-1350
Email: secretary@dps.ny.gov

RE:

Case 18-E-0018 – In the Matter of Proposed Amendments to the New York State Standardized Interconnection Requirements (SIR) for Small Distributed Generators

Case 15-E-0751 – In the Matter of the Value of Distributed Energy Resources

Dear Secretary Burgess,

On June 19, 2018, the Joint Utilities ("JU") filed a proposed model tariff for compensation of a hybrid energy storage system ("ESS") and distributed generation systems interconnected with the three-meter configuration approved in the New York Public Service Commission’s April 19, 2018 Order. SolarPark Energy and our development partners, Helios Energy and Montante Solar, are actively pursuing integration of ESS into community solar projects. Our organizations appreciate the Commission’s attention to ensuring that hybrid systems can be efficiently interconnected and appropriately compensated. There are many potential use cases for hybrid DG-ESS. SolarPark Energy, Helios Energy and Montante Solar strongly support the comments of Clean Energy Collective and Borrego Solar Systems filed yesterday, October 9th, on the deployment in all cases. Specifically, we wish to emphasize the importance of a near term resolution on two critical issues for solar + storage systems which are designed to inject only generation from VDER-eligible technologies to the grid:

1) Hybrid DG-ESS systems that inject only generation from VDER-eligible technologies to the Grid – Options 2a and 2b under the JU Model Tariff – should be eligible for full value stack compensation, including all ICAP Alternatives

All generation from VDER-eligible technologies should be compensated at the full value stack, (energy value + capacity value +environmental value, + MTC or DRV based on subscriber rate class. Hybrid DG-ESS systems, injecting only VDER-eligible generation should be eligible for the same ICAP Alternatives as standard solar-only systems. While ICAP Alternatives 1-2 may not allow the project to create as much value as an efficiently managed hybrid system might under Alternative 3, there are reasons Alternatives 1-2 may be viewed more positively by financiers.
There is no reason to preclude access to ICAP Alternatives 1-2; the Commission should provide as much flexibility as possible for companies developing DG-ESS projects to find workable financial models given the rapidly evolving technology, significant reductions in ESS costs and the regulatory environment.

2) **Hybrid DG-ESS systems in which the ESS is exclusively charged by VDER-eligible technologies – Option 2a in JU Model Tariff – should only require one meter**

The current JU Model Tariff proposes that Option 2a should follow the multiple meter configuration in the April 19 Order. However, the positions laid out in the JU filing make it clear that two or three meters are not necessary for Option 2a. The Customer is required to demonstrate that the ESS is only charged with eligible generation, the generator and ESS are behind the same Point of Common Coupling (“PCC”), and the relevant injections into the grid for determining VDER compensation are measured at the PCC. Therefore, all energy injected at the PCC will be eligible clean energy, and any transfer of energy to or from the ESS behind the PCC does not need to be quantified separately. The Commission needs to clarify its previous Order and specify that only one meter is needed in Option 2a, eliminating the additional cost and complexity that would come from communicating and tracking data from unnecessary meters.

SolarPark Energy, Helios Energy and Montante Solar appreciate your consideration of the outlined issues and strongly urge the Commission to direct the utilities to incorporate a clearly outlined resolution to these two major issues in their next tariff revision.

**Thomas J. Guzek**  
**Managing General Partner**  
**SolarPark Energy LLC**