



Honorable Kathleen H. Burgess, Secretary  
New York State Department of Public Service  
Three Empire State Plaza  
Albany, NY 12223-1350

October 31, 2018

**Subject: Case No. 18-E-0130 — New York State Energy Storage Roadmap and Department of Public Service / New York State Energy Research and Development Authority Staff Recommendations (Roadmap)**

Dear Secretary Burgess:

On October 5, 2018, the Public Service Commission (“Commission”) issued a notice soliciting public comment in the above-captioned docket on whether the Commission should adopt the proposals put forth in New York State Energy Storage Roadmap and Department of Public Service / New York State Energy Research and Development Authority Staff Recommendations” (“Roadmap”). As a developer, builder, and operator of energy storage systems, Borrego Solar Systems, Inc. (“Borrego Solar”) appreciates the opportunity to provide further comments on the Roadmap. With the right regulatory structures in place, New York has a tremendous opportunity to cost-effectively deploy energy storage, reduce the need for polluting generation resources, and decrease costly investment in transmission and distribution infrastructure, all while promoting grid resilience.

Borrego Solar respectfully refers the Commission to the comments we have filed in this above-referenced docket (Item No. 32) in response to the Commission’s earlier solicitation for comments on the Roadmap, issued in July 2018. We ask that the Commission consider these comments when determining whether to adopt the Roadmap’s recommendations. We also would like to draw particular attention to our concerns regarding retail demand charges for energy storage systems, on pages 1-2, under the heading “Section 4.1.2 Commodity and Delivery Costs for Storage Charging and Discharging.” Building on these comments, we believe it would be prudent, as a short term measure, to direct the utilities to propose optional rate structures for energy storage systems and/or revisions to existing tariff provisions that are designed to avoid disincentivizing the injection of power at times of high demand. Because these types of retail rate structures currently represent unnecessary barriers to the deployment of energy storage systems that can help alleviate distribution and transmission costs, we recommend that the Commission direct the utilities to propose revisions within three months of the Commission’s order in this

docket, with a goal of having revised structures in place within six months, to align with the rollout of the Energy Storage Roadmap.

Sincerely,

Peter S. Ross  
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