The New York Battery and Energy Storage Technology Consortium (“NY-BEST”) is providing these comments regarding the establishment of a process for the development of the next version of the Value of Distributed Energy Resources Tariff in New York (Phase 2).

NY-BEST is supportive of the process proposed by the Clean Energy Parties (SEIA, Vote Solar, Coalition for Community Solar Access, the Alliance for Solar Choice, Pace Energy and Climate Center, NRDC and Acadia Center) as set forth and shared with parties on November 13, 2017. While we are sensitive to the concerns of the JU regarding the potential for the CEP’s proposed process to create a burdensome discovery process, we believe efficiencies can be achieved to avoid unreasonable inquiries and that the CEP’s proposal allows for reasoned and transparent consideration of the issues by all stakeholders.

Finally, as NY-BEST has stressed in numerous previous comments, immediate fast track action is needed by the Department and the Commission on stand-alone energy storage. This issue has been delayed for several months despite the Department staff and Commission identifying it as a priority.

As staff is aware, the non-NEM technology working group established in the summer of 2016 under Phase One of VDER had very constructive and productive discussions which led to storage combined with NEM eligible technologies being included in the Commission’s Phase One VDER Order. Based on those discussions, NY-BEST believes that with a concerted effort, stand-alone energy storage can be addressed quickly in Phase 2. That working group, comprised of DPS staff, utilities’ representatives and DER providers, all recognized and agreed that because
energy storage is a unique technology, acting as both generation and load, it is important to consider it separately when designing compensation methodologies. The group further recommended that action be taken as quickly as possible in 2017 to address stand-alone energy storage.

NY-BEST’s request for prompt action is consistent the DPS Staff Report on VDER, wherein staff recommended, “For energy storage systems not co-located with NEM-eligible generation, development of a proposal by early 2017 to enable Commission action in 2017.” ¹ The Commission in its Order on VDER further noted that “energy storage is a key component of our energy future” and “The integration of storage into DER deployments and the utility system has the potential to substantially enhance DER’s capability to lower system costs and provide a variety of energy services” and encouraged expeditious action on the application of VDER to stand-alone energy storage projects. ²

The markets for energy storage in New York continued to be stalled due to the lack of a regulatory framework, market signals and monetization mechanisms that value energy storage. Action in the near term in Phase Two of VDER is essential for the State to realize the benefits that energy storage can bring to the State’s electric grid.

NY-BEST and our more than 150 organizational members from across New York State and beyond appreciate the opportunity to provide input on the VDER process. We are prepared to fully participate in the on-going efforts of the working groups and are ready to assist Department staff in this endeavor. If you have any questions or require additional information regarding these comments, please contact me at (518) 694-8474.

Respectfully,

William P. Acker
Executive Director

---

¹ Staff Report and Recommendation on the Value of Distributed Energy Resources Proceeding, October 27, 2016, p. 47
² PSC Order on NEM, Phase One of Value of DER and Other Matters, March 9, 2017, p. 48-49