

May 5, 2021

VIA ELECTRONIC FILING

Hon. Michelle L. Phillips
Secretary to the Commission
New York State Public Service Commission
3 Empire State Plaza
Albany, NY 12223-1350

Re: Case 21-E-0122 - Verified Petition of East River ESS, LLC for an Expedited Order Granting a Certificate of Public Convenience and Necessity Pursuant to Section 68 of the Public Service Law and Establishing a Lightened Regulatory Regime

Dear Secretary Phillips:

The New York League of Conservation Voters (NYLCV) respectfully submits this letter in support for the environmental sustainability approach taken by 174 Power Global's East River ESS, LLC's ("East River ESS") in their proposed energy storage facility.¹ NYLCV is a non-partisan statewide environmental organization in New York that fights for clean water, clean air, renewable energy and open space through political action.

NYLCV has long supported the development of energy storage systems around New York State. Last year, NYLCV published our New York State Policy Agenda, which outlined benchmark goals that would ensure the State successfully meets goals set forth in the Climate Leadership and Community Protection Act.² The benchmark set for energy storage represented 3 gigawatts by 2030.

Using energy storage systems, such as large-scale batteries, can help drive down electricity costs, integrate renewable energy, and provide a stable supply during peak electric usage or operate critical systems during a grid outage. Battery storage can help the grid operator and utilities better plan and fully utilize existing assets, ensuring reliability, a consistently larger percentage of clean energy usage, and also bringing down cost. NYLCV believes that the approach taken by 174 Power Global's East River ESS will contribute to those benchmarks and realize the aforementioned benefits as a

¹ Case 21-E-0122, Verified Petition of East River ESS, LLC for an Expedited Order Granting a Certificate of Public Convenience and Necessity Pursuant to Section 68 of the Public Service Law and Establishing a Lightened Regulatory Regime, (filed February 19, 2021) ("Petition").

² New York League of Conservation Voters State Policy Agenda for 2020 Accessible at : https://nylcv.org/wp-content/uploads/NYS_PolicyAgenda2020_WEB_PAGES.pdf

result of its deployment in Zone J.

As an aside, the Project is a tangible representation of New York's renewed energy policies. The project site is a repurposing of a brownfield site that previously served as the location of the Charles Poletti Power Plant, one of the nation's dirtiest power plants while it was in operation. The environmental outcomes of the Project is symbolic of the State's move toward a just transition and toward a goal of zero emissions by 2040.

174 Power Global's East River ESS Project has the potential to provide many benefits to the City and the State. NYLCV encourages the Public Service Commission to take action consistent with encouraging greater proliferation of energy storage in New York State and to strongly consider the environmental benefits of the Project as it considers the Certificate of Environmental Compatibility and Public Need.

Respectfully Submitted,

Julie Tighe
President
New York League of Conservation Voters