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January 12, 2021

VIA ELECTRONIC FILING

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

Re: Case 19-E-0122 – Petition of Ravenswood Development, LLC for Order Granting Certificate of Public Convenience and Necessity and Establishing Lightened Regulatory Regime: Request for Extension of Deadline

Dear Secretary Phillips:

I am writing on behalf of Ravenswood Development, LLC (“Ravenswood”), pursuant to Ordering Clauses 20 and 32 of the *Order Granting a Certificate of Public Convenience and Necessity* in the above-noted proceeding, issued by the Commission on October 17, 2019 (“CPCN Order”). Ravenswood’s petition concerned the planned phased development of an energy storage facility with a capacity of up to 316 MW (“Facility”) at the Ravenswood Generating Station property in Long Island City, Queens, New York. As explained below, the construction plans and schedule set forth in Ravenswood’s petition have been affected by the results of Con Edison’s bulk storage requests for proposals (“RFPs”) as well as changes to the process of implementing the Commission’s *Order Establishing Energy Storage Goal and Deployment Policy* (“Energy Storage Order”).¹ As a result, Ravenswood respectfully requests that the Secretary extend the deadline set forth in Ordering Clause 20 for completion of construction of the Facility consistent with these changed circumstances.

The Ravenswood petition described the expected development of the Facility in three phases:²

- Phase 1: Southeast Building, with up to 129 MW energy storage capacity

¹ Case 18-E-0130, *In the Matter of Energy Storage Deployment Program (Storage Proceeding), Order Establishing Energy Storage Goal and Deployment Policy* (issued December 13, 2018).

² CPCN Order at 8.

- Phase 2: North Building, with up to 98 MW energy storage capacity
- Phase 3: Southwest Building, with up to 89 MW energy storage capacity

At the time of the CPCN Order, Ravenswood anticipated that the first phase would commence operation in March 2021, with the other phases to follow based on several factors including governmental rules, incentives, and market initiatives.³ The expected completion date for the first phase relied on, in part, Ravenswood receiving an award under Con Edison's initial Bulk Energy Storage RFP issued in accordance with the Energy Storage Order.⁴ However, the delay in announcing the RFP results and the fact that Ravenswood was ultimately not successful in the limited awards issued to date under Con Edison's initial RFP necessitates a delay in the expected date of completion.

The project schedule for development of the Facility ultimately relies upon receipt of a financeable revenue or offtake agreement to ensure a return on capital. Con Edison's total requirement of 300MW of bulk storage procurement has not yet been satisfied and one or more subsequent RFP rounds are anticipated, though on a longer timeframe than initially contemplated. On October 30, 2020, Con Edison joined several other New York utilities (the "Joint Utilities") in a petition requesting an extension of the in-service date under the Commission's Energy Storage Order for the storage resources procured as part of the Joint Utilities' bulk level storage solicitation requirements.⁵ In that petition, the Joint Utilities indicate that they plan to issue a second Bulk Energy Storage RFP during the second quarter of 2021. Ravenswood has progressed its interconnection requests to support the phased development of the project and continues to maintain them consistent with New York Independent System Operator requirements, and is therefore well positioned to participate in Con Edison's next RFP. However, since the process to implement the Energy Storage Order, as well as the development of revenue opportunities, has taken longer than expected, the start of construction needs to be deferred until sufficient financial support is available for the investment.

Ordering Clause 20 requires that Ravenswood file with the Secretary a construction progress report that either indicates that construction of the Facility will be complete before April 2021, or demonstrates why construction should be permitted to proceed beyond that date. Construction has not commenced for the reasons stated above, so Ravenswood is requesting a deferral of the start of the project, which necessarily results in a completion date beyond April 2021. Consistent with Con Edison's request for modified deadlines to meet milestone obligations under the Energy Storage Order and Ravenswood's understanding of likely timelines for Con Edison's implementation of subsequent RFPs under the order, Ravenswood requests that

³ CPCN Order at 9.

⁴ Con Edison issued its first Bulk Energy Storage RFP to satisfy its storage targets under the Energy Storage Order on or about July 15, 2019. Ravenswood timely responded to this RFP.

⁵ See Case 18-E-0130, *Joint Utilities' Petition to Modify the Energy Storage Order to Improve Procurement Results* (Oct. 30, 2020).

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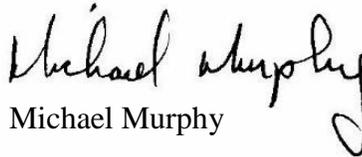
the April 2021 date be extended to June 2024, and that this new date be established as the date by which Ravenswood would complete construction of Phase 1 of the Facility. Consistent with the CPCN Order, the construction schedule for subsequent phases has not been determined and would be established based on factors including governmental rules, incentives, and market initiatives.

Extension of the foregoing deadline will serve the public interest as embodied in the goals of the Energy Storage Order and New York's Climate Leadership and Community Protection Act ("CLCPA"). As the Commission recognized in its press release announcing the CPCN Order, the Facility "will displace energy produced from fossil plants during peak periods, resulting in cleaner air and reduced carbon emissions."⁶ The Facility will also contribute toward the mandates of the CLCPA, which requires the establishment of three gigawatts of energy storage by 2030. To help meet the goals of the CLCPA, Ravenswood plans to continue to participate in Con Edison's RFP processes, as well as other processes that will financially support energy storage, and ultimately construct the Facility on a timeline that is in the public interest.

Please contact me ((212) 702-5436; mmurphy@bdlaw.com) or my colleague John Paul ((212) 702-5456; jpaul@bdlaw.com) if you have any questions or require additional information.

Thank you for your attention to this matter.

Respectfully submitted,


Michael Murphy

⁶ See Case 19-E-0122, *PSC Approves Ravenswood Energy Storage Project* (Oct. 17, 2019).