STATE OF NEW YORK
PUBLIC SERVICE COMMISSION

In the Matter of	)	
Energy Storage Deployment Program	)	Case 18-E-0130

JOINT UTILITIES REPLY COMMENTS ON NEW YORK STATE ENERGY STORAGE ROADMAP AND DEPARTMENT OF PUBLIC SERVICE/ NEW YORK STATE ENERGY RESEARCH AND DEVELOPMENT AUTHORITY STAFF RECOMMENDATIONS

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I. Introduction and Summary

In response to the September 10, 2018 initial comments of parties regarding the *New York State Energy Storage Roadmap and Department of Public Service/New York State Energy Research and Development Authority Staff Recommendations* ("Roadmap"),[1] Central Hudson Gas & Electric Corporation, Consolidated Edison Company of New York, Inc., New York State Electric & Gas Corporation, Niagara Mohawk Power Corporation d/b/a National Grid, Orange and Rockland Utilities, Inc., and Rochester Gas and Electric Corporation (collectively, the "Joint Utilities") file this Reply.[2] As with the Joint Utilities Initial Comments regarding the Roadmap, the Reply is structured to address interrelated topics rather than precisely following the Roadmap. These topic areas address: (1) storage benefits and incentives; (2) utility roles;

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[1] Case 18-E-0130, *In the Matter of Energy Storage Deployment Program* ("Energy Storage Proceeding"), New York State Energy Storage Roadmap and Department of Public Service/New York State Energy Research and Development Authority, Staff Recommendations (filed June 21, 2018) ("Roadmap").

[2] Energy Storage Proceeding, Notice Soliciting Comments and Announcing Technical Conferences (issued July 17, 2018. Pursuant thereto reply comments are due September 24, 2018.

(3) Benefit Cost Analysis ("BCA") Handbook modifications, optionality, and E-Value; (4) rate design; (5) system and customer; and (6) wholesale market considerations.

Key points for New York State Public Service Commission ("Commission") consideration include:

- The Commission should prioritize energy storage projects and use Market Acceleration Incentive ("MAI") funds strategically to maximize the cost-effective deployment of that technology. Funds should be allocated to the projects that produce the greatest benefits for customers, *i.e.*, applications that produce distribution and/or bulk system benefits, thereby maximizing their contribution toward meeting the State's storage goals;
- Non-wires Solutions ("NWS") procurements as currently designed, rather than an expanded NWS approach or tariffed approach, are the best approach for economically acquiring storage resources by meeting specified distribution system needs while basing compensation on the locational and temporal benefits of distributed energy resources ("DER");
- Future changes to the BCA Handbook, including an assessment of the best way to address the optionality of storage, should be left to a BCA Handbook review process that considers other potential changes, *e.g.*, E-Value, in a comprehensive manner; and
- Rate design questions are best resolved in the Value of Distributed Energy Resources ("VDER") Rate Design and Value Stack Working Groups[3] so that future rate designs and

[3] These working groups are within Case 15-E-0751, *In the Matter of Distributed Energy Resources* ("VDER Proceeding").

Value Stack compensation are evaluated holistically, provide accurate consumption signals, and provide fair compensation for all DER.

II. Storage Benefits and Incentives

Energy storage has the potential to play an important role in New York's clean energy future.[4] For optimal deployment, the Commission's storage policy should recognize the advantages of distribution and bulk system storage over most customer-sited deployments[5] by adopting the fundamental principle outlined in the Joint Utilities' Initial Comments that customer funds used to incent storage development should be targeted to developing storage applications that produce quantifiable distribution and/or bulk system benefits.[6] This principle that customer funds should be deployed to provide benefits should apply equally to programs that are funded by utilities or the New York State Energy Research and Development Authority ("NYSERDA").[7]

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4 Energy Storage Proceeding, Initial Comments of City of New York in Response to the Energy Storage Roadmap (filed September 10, 2018)("Comments of NYC") p. 3; Comments of Key Capture Energy (filed September 10, 2018)("Comments of Key Capture"), p. 9; Comments of Northern Power Systems (filed September 10, 2018) ("Comments of Northern Power"), p. 1; Comments of New York Battery and Energy Storage Technology Consortium, Inc. (filed September 10, 2018)("Comments of NY-Best"), p. 3; New York City Environmental Justice Alliance Comments on the NY Energy Storage Roadmap (filed September 10, 2018), p. 2; Initial Comments of Multiple Intervenors (filed September 10, 2018)("Comments of Multiple Intervenors"), p. 2, and Comments of SunRun Inc. on New York State Energy Storage Roadmap and Staff Recommendations (filed September 10, 2018)("Comments of SunRun"), pp. 1-2, 10-11.

5 *Id*.

6 Energy Storage Proceeding, Joint Utilities Comments on New York State Energy Storage Roadmap and Department of Public Service/New York State Energy Research and Development Authority Staff Recommendations (filed September 10, 2018) ("Joint Utilities Initial Comments"), pp. 10-11.

7 *Id*.

Consistent with their Initial Comments,[8] the Joint Utilities support the position taken by Multiple Intervenors[9] and others[10] that the potential cost impacts of the MAI must be evaluated in a comprehensive manner that considers all other utility activities and Commission policy initiatives. This maintains consistency with the fundamental BCA concepts established by the Commission. Given these considerations, the Joint Utilities believe the Commission should prioritize the use of MAI funds to those energy storage projects that are most cost-effective, thereby maximizing progress towards meeting the State's storage goals.

Several parties made specific recommendations regarding a prescriptive disposition of MAI funds across the three energy storage use cases.[11] These positions should be rejected because they (1) reflect an arbitrary result without any supporting technical analysis; (2) would channel money to the customer-sited projects that in many cases will only benefit participants while increasing costs to non-participants; and (3) do not give the Commission the flexibility to allocate funds to the projects that produce the greatest benefits for all customers.

The City of New York stated that projects with high avoided emissions profiles or projects that produce bill reductions and clean energy opportunities for low-income customers and customers in Environmental Justice areas should be given priority for the MAI.[12] The value

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8 Energy Storage Proceeding, Joint Utilities Initial Comments, p. 11.

9 Energy Storage Proceeding, Comments of Multiple Intervenors, pp. 4, 6.

10 *E.g.*, Energy Storage Proceeding, Comments of NY-BEST, p. 16; Comments of NYC, pp. 6-7.

11 Energy Storage Proceeding, Comments of Fluence (filed September 10, 2018)("Comments of Fluence), p. 3; Comments of the Enel Group Companies on the New York State Energy Storage Roadmap and Department of Public Service/New York State Energy Research and Development Authority Staff Recommendations (filed September 10, 2018)("Comments of Enel"), p. 11.

12 Energy Storage Proceeding, Comments of NYC, pp. 6-7.

of emissions reductions is currently captured in the BCA. However, considerations related to the provision of clean energy opportunities for low-income customers and customers in Environmental Justice areas could be a qualitative policy consideration for the Commission when determining how MAI moneys are allocated among projects with similar net benefits.

Finally, the New York Power Authority ("NYPA") stated that it should be eligible for MAI funds since storage opportunities for public customers can benefit all customers.[13] Generally, only customers who pay the System Benefits Charge are eligible to participate in NYSERDA and Commission-approved public benefit programs.[14] Therefore, NYPA should be allowed to participate in the allocation of MAI funds proportionate to its customers' contribution to the $350 million fund.

III. Utility Roles

A. Non-Wires Solutions

The parties' NWS comments focused on three areas: (1) the use of tariffs to acquire storage resources; (2) the specific NWA+ process envisioned in the Roadmap; and (3) the transparency of the NWS process.

Several parties proposed that utility tariffs be employed to acquire storage resources.[15] Borrego Solar Systems, Inc. ("Borrego") stated that the Value Stack tariff should be the

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[13] Energy Storage Proceeding, Comments of the New York Power Authority on the New York State Energy Storage Roadmap (filed September 10, 2018)("Comments of NYPA"), p. 8.

[14] The Commission rejected NYSERDA's proposal to allow access to Clean Energy Funds regardless of contribution in Cases 14-M-0094 *et al.*, *Proceeding on Motion of the Commission to Consider a Clean Energy Fund*, Order Authorizing the Clean Energy Fund Framework (issued January 21, 2016), p. 62.

[15] *E.g.*, Energy Storage Proceeding, Comments of NY-BEST, p. 10.

"workhorse" of the State's storage deployment strategy, noting that developers consider the deployment of storage through NWS to be a high-risk and time-constrained exercise.[16] The Joint Utilities acknowledge that tariffs are one way of acquiring storage resources but tariffs are not as cost-effective as competitive procurements and, as currently envisioned by the Department of Public Service Staff ("Staff"), would lack a location-specific component.

Specifically, the *Draft Staff Whitepaper Regarding VDER Compensation for Avoided Distribution Costs* ("Draft Staff Whitepaper")[17] proposes eliminating the Locational System Relief Value ("LSRV") tariff and calculating compensation for distribution system attributes based on two variants of the Demand Reduction Value ("DRV") tariff, neither of which set compensation using location-specific costs but instead are based on average system-wide marginal costs.[18] As a consequence, the VDER tariff envisioned in the Draft Staff Whitepaper is a blunt tool that undercompensates storage when it produces quantifiable distribution benefits at specific substations or feeders that provide greater benefits than the average DRV compensation, and overcompensates storage elsewhere.

The Joint Utilities continue to believe that NWS procurements are the optimal approach for economically acquiring resources to meet specified distribution system needs with

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16 Energy Storage Proceeding, Comments of Borrego Solar Systems, Inc. (filed September 10, 2018)("Comments of Borrego"), pp. 2-3.

17 VDER Proceeding, Draft Staff Whitepaper Regarding VDER Compensation for Avoided Distribution Costs (issued July 26, 2018) ("Draft Staff Whitepaper"). Comments have been filed on this draft and Staff plans to issue a subsequent whitepaper that will also be the subject of notice and comment.

18 *Id.*, pp. 6-9.

compensation based on the locational and temporal benefits of DER. A similar conclusion was reach in the Staff Draft Whitepaper.[19]

Many parties also commented on the Roadmap's NWA+ proposal that would expand NWS solicitations to seek benefits that are not currently contemplated by NWS solicitations, such as system peak reduction. The City of New York opposed NWA+ and asserted that NWS solicitations should be limited to seeking solutions that could be as operationally effective as traditional infrastructure solutions but at a lower cost.[20] Enel Group Companies ("Enel"),[21] GlidePath Development LLC ("GlidePath"),[22] and New York Battery and Energy Storage Technology Consortium, Inc. ("NY-BEST")[23] supported the NWA+ concept. As noted in their Initial Comments, the Joint Utilities do not support the NWA+ proposal if it means that proposals deviating from the intended primary purpose of NWS, *i.e.*, addressing the need for load relief in specific areas during specific times, would yield lower BCA scores. While the Joint Utilities agree with the City of New York that the major focus of NWS solicitations should be seeking alternatives to traditional infrastructure solutions, there may be situations where an expanded NWS is a beneficial option because it produces a better BCA than the pre-expansion NWS and does not impact the timing or effectiveness of the NWS solution. In such situations, the expanded NWS delivers the greatest net benefits to customers and implementation should be considered.

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19 *Id.*, pp. 5-6.
20 Energy Storage Proceeding, Comments of NYC, p. 7.
21 Energy Storage Proceeding, Comments of Enel, pp. 7-8.
22 Energy Storage Proceeding, Comments of GlidePath Development LLC (filed September 10, 2018) ("Comments of GlidePath"), p. 3.
23 Energy Storage Proceeding, Comments of NY-BEST, pp. 12-14.

Parties addressing the transparency of the NWS process expressed concerns related to (1) information provided by the utilities as part of the RFP process; (2) increased bid flexibility; and (3) contract provisions that would increase the financeability of NWS projects. With respect to the information provided to potential bidders, Enel requested that utilities be required to disclose the marginal cost of the traditional wires solution and update hosting capacity maps and locational consumption information prior to releasing NWS solicitations.[24] NY-BEST,[25] SunRun Inc. ("SunRun"),[26]and Key Capture Energy[27] also suggested that the information provided as part of the NWS process is insufficient and requested additional information. While matters related to system data are addressed in more detail in Section VI below, the Joint Utilities note that their standard NWS practice is to provide potential bidders a full suite of data to encourage complete, accurate, competitive, and responsive bids. Each NWS solicitation is unique but they all include detailed information related to the specific system constraint and the location and types of resources that might be employed to relieve the constraint.

GlidePath[28] and NY-BEST[29] stated that the NWS process should be more flexible and consider other options offered by developers. As noted in the Joint Utilities Initial Comments, developers already have considerable flexibility when responding to NWS solicitations.

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[24] Energy Storage Proceeding, Comments of Enel, pp. 7-8.
[25] Energy Storage Proceeding, Comments of NY-BEST, pp. 12-14.
[26] Energy Storage Proceeding, Comments of SunRun, p. 9.
[27] Energy Storage Proceeding, Comments of Key Capture, p. 3.
[28] Energy Storage Proceeding, Comments of GlidePath, p. 4.
[29] Energy Storage Proceeding, Comments of NY-BEST, pp. 12-14.

Specifically, developers are free to propose other options and NWS procurements can result in solutions that do not precisely match the impact of the traditional solution.[30]

GlidePath and other parties suggested that NWS awards be structured in a way to provide a long-term revenue source to facilitate financing.[31] NY-BEST recommended that the NWS process consider NWS results as long-term solutions and establish contracts of at least seven years and potentially up to 10-20 year terms.[32]

The purpose of NWS solicitations, however, is not to guarantee the financeability of projects but rather to assure that distribution system needs are addressed in a cost-effective manner for a specific period of need. [33] Ideally, the term of the compensation should correspond to the term of the services needed and rendered. While the Joint Utilities believe that there may be ways of making the amount of compensation more certain, any compensation provided to DER must be linked to the value of the anticipated infrastructure deferral and not the DER's measure life. Compensation beyond the term of the services provided to accommodate longer-term contracts and/or financing would result in utility customers paying for services beyond what is needed. However, once the period of distribution system need ends, the storage installation can continue to provide other benefits such as resilience and the ability to manage delivery charges and/or participate in the New York Independent System Operator ("NYISO") markets.

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30 Energy Storage Proceeding, Joint Utilities Initial Comments, p. 18.
31 Energy Storage Proceeding, Comments of GlidePath, p. 4.
32 Energy Storage Proceeding, Comments of NY-BEST, pp. 12-14.
33 The compensation term for utility NWS transactions has ranged from three to five years.

If storage or any other form of DER is determined to be part of a cost-effective solution to meet a system need but the project cannot be financed, the Commission should consider utility ownership of storage and relevant assets to facilitate savings for customers.

B. Ownership Models

The Roadmap recognizes that the *Order Adopting Regulatory Policy Framework and Implementation Plan* ("REV [Reforming the Energy Vision] Track One Order") permits utility ownership for storage integrated into the distribution system, in cases of market failure, and in other situations.[34] Proposals that seek to further restrict utility ownership are counter to the Commission's prior decision, and as such should be rejected.[35]

C. Dynamic Load Management ("DLM")

Enel,[36] NY-BEST,[37] and NYPA,[38] were supportive of the Roadmap's recommendation to extend the term of DLM programs while developing a "premium" DLM resource category. As noted in the Joint Utilities Initial Comments, these modifications are unnecessary because: (1) the current DLM approach is working well; (2) the proposed DLM modifications would create a multi-year lock untethered to a specific grid need and are thus less likely to produce net benefits than NWS and other programs that are linked to an actual grid need; (3) this recommendation could create confusion, create artificial arbitrage opportunities, and produce suboptimal

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34 Energy Storage Proceeding, Roadmap, pp. 7-8, citing Case 14-M-0101, *Proceeding on Motion of the Commission in Regard to Reforming the Energy Vision* ("REV Proceeding"), Order Adopting Regulatory Policy Framework and Implementation Plan ("REV Track One Order") (issued February 26, 2015), pp. 67-70.

35 *See, e.g.*, Energy Storage Proceeding, Comments of Enel, pp. 6-7.

36 *Id*., p. 5.

37 Energy Storage Proceeding, Comments of NY-BEST, p. 9.

38 Energy Storage Proceeding, Comments of NYPA, pp. 4-5.

outcomes; and (4) the premium service proposal based on performance is unnecessary as the current DLM programs already expect consistent and high performance levels from participants.[39]

IV. BCA Handbook Modifications, Optionality, and E-Value

Parties' comments directly related to the BCA Handbook center primarily on optionality, the development of a BCA "tool," and the consideration of costs. The City of New York and NY-BEST argued that the BCA Handbook should take a more "nuanced" approach for addressing optionality.[40] National Resources Defense Council ("NRDC")[41] suggested that a BCA tool be developed to help assess and prioritize storage projects. Multiple Intervenors urged "rigorous" examination of the costs and impact of storage deployments in a manner that considers the MAI subsidy and compares storage to all other options.[42]

The Joint Utilities see merit in considering all of these suggestions. The Joint Utilities Initial Comments explained how the current NWS process captures elements of optionality[43] and why future changes to the BCA Handbook, including an assessment of how best to address the optionality of storage, should be left to a review process that considers other potential changes, *e.g.*, E-Value, in a comprehensive manner. Such an approach would be consistent with the processes employed to develop the BCA Handbooks in 2016 and revise them in 2018 and would

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39 Energy Storage Proceeding, Joint Utilities Initial Comments, pp. 14-15.
40 Energy Storage Proceeding, Comments of NYC, p. 7 and Comments of NY-BEST, pp. 11-12.
41 Energy Storage Proceeding, Comments on Valuing Emissions Benefits in the Bridge Incentive, Increasing Incentives for Bulk Standalone Energy Storage, and Pursuing the Peaking Unit Contingency Plans of Natural Resources Defense Council (filed September 10, 2018)("Comments of NRDC"), p. 1.
42 Energy Storage Proceeding, Comments of Multiple Intervenors, pp. 3-4.
43 Energy Storage Proceeding, Joint Utilities Initial Comments, p. 18.

address Multiple Intervenors' concern that all the BCA elements fit together and be applied in a consistent manner to all technologies.

The Joint Utilities understand that work on the BCA Handbook related to E-Value is linked directly to matters that the VDER Value Stack Working Group is expected to address next year. Furthermore, any reforms to the E-Value developed by that working group may eventually be replaced by the NYISO's proposal to have energy prices reflect the social cost of carbon on a temporal basis. This initial work should consider how a shaped E-value would be translated into a Renewable Energy Credit ("REC") and how this would align with NYSERDA procurements of RECs from large-scale renewable resources to avoid cost-shifts for all customers.[44] The Joint Utilities support further work on this matter in a way that considers impacts on all resources and the potential for increasing costs to customers.

Finally, the City of New York raised several matters related to compensation for targeted reliability and resilience in environmental justice areas.[45] The implications of this position on Value Stack compensation and the BCA Handbook should be analyzed within the VDER Value Stack Working Group.

V. Rate Design Implications

The parties made extensive comments addressing rate design and tariffs, many of which are being addressed in the VDER Rate Design and Value Stack Working Groups. The Joint Utilities Initial Comments explain why it is inappropriate to modify retail rate designs within a proceeding focused on a single resource type. Moreover, virtually all of the rate design and tariff

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[44] Energy Storage Proceeding, Joint Utilities Initial Comments, pp. 19-20.
[45] Energy Storage Proceeding, Comments of NYC, p. 6.

issues identified by the parties are being considered by VDER Rate Design Working Group and the VDER Value Stack Working Group. The Joint Utilities believe that all of these are best resolved in those forums so that future rate designs and Value Stack compensation are evaluated holistically and provide accurate consumption signals and provide fair compensation for all DER.

Several parties made new rate design proposals in response to the Roadmap. For example, NY-BEST made a series of extensive rate design recommendations addressing hourly, location-based delivery rate, contract demand charges, and demand charges in off-peak periods, among other issues.[46] It would be premature to consider rate design matters within the confines of the Energy Storage Proceeding without first such matters addressed holistically by the VDER Rate Design Working Group.

VI. System and Customer Data

Borrego,[47] City of New York,[48] Northern Power Systems,[49] NY-BEST,[50] NYPA,[51] and SunRun[52] all stated that more system and customer data is required to help provide a better understanding of the distribution system needs and how to address them. While the Roadmap states that developers need this information to independently identify and evaluate system

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46 Energy Storage Proceeding, Comments of NY-BEST, pp. 5-7.
47 Energy Storage Proceeding, Comments of Borrego, p. 7.
48 Energy Storage Proceeding, Comments of NYC, pp. 7-8.
49 Energy Storage Proceeding, Comments of Northern Power, p. 5.
50 Energy Storage Proceeding, Comments of NY-BEST, p. 13-14.
51 Energy Storage Proceeding, Comments of NYPA, p. 6.
52 Energy Storage Proceeding, Comments of SunRun, pp. 9-10.

needs,[53] this statement is incompatible with the Commission's decision in the REV Track One Order that utilities are best positioned to identify and develop solutions for distributions needs, and that utilities should serve as the Distributed System Platform ("DSP") Providers.[54] In that role, the Joint Utilities already provide developers large amounts of system data to assist in the creation of developer proposals and projects[55] while also using that data internally to plan for and maintain an electric distribution system that provides safe and reliable service. Because the utilities have undertaken these analyses, it is inefficient for third parties to independently attempt to identify distribution system needs. To the extent that developers require additional information for purposes other than the identification of distribution system needs, they should identify their specific needs.

Similarly, parties addressing the transparency of the NWS process expressed concerns related to information provided by the utilities as part of the RFP process. As explained in their Initial Comments, the Joint Utilities and stakeholders have been working on system data issues since mid-2017 through the System Data Access Working Group and that information regarding the types, format, and granularity of data already has been shared and is available to stakeholders. Additional data is provided in the 2018 DSIP Update filings[56] and as part of the NWS process itself. The Joint Utilities believe much if not all of the data requested by the

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53 Energy Storage Proceeding, Roadmap, p. 60.
54 REV Proceeding, REV Track One Order, pp. 48-53.
55 Energy Storage Proceeding, Joint Utilities Initial Comments, pp. 23-25.
56 *E.g.*, Case 16-M-0411, *In the Matter of Distributed System Implementation Plans*, Consolidated Edison Distributed System Implementation Plan (filed July 31, 2018).

parties is already available and suggest a technical session to review the scope of the available data.

VII. Wholesale Market Issues

The Joint Utilities have no comments related to dual participation and Buyer Side Mitigation matters. Regarding the Roadmap's Clean Peak proposal, most parties supported carefully moving forward with analyses similar to those outlined in the Roadmap.[57] NY-BEST, however, stated that there is sufficient information on the reliability and operational characteristics of peaking plants for the Commission to take actions that accelerate the replacement of some units with storage and other forms of clean DER.[58] Similarly, NY-BEST proposed a new "Clean Reliability Program" with "Clean Reliability Credits" both of which were not elements of the Roadmap.[59]

The Joint Utilities believe the Commission should reject NY-BEST's proposal on three grounds: (1) as NRDC notes,[60] Clean Peak should utilize existing NYISO approaches for addressing potential plant closures as it is the NYISO's responsibility, not the Commission's, to make determinations regarding the impact of retirements on system reliability; (2) NY-BEST's assertion that sufficient information exists to make such a determination is not true because, as the Roadmap concludes, a detailed analysis is required to study this topic; and (3) it is premature

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57 *See, e.g.*, Energy Storage Proceeding, Comments of NYC, pp. 9-11, and Comments of NRDC, p. 10.
58 Energy Storage Proceeding, Comments of NY-BEST, p. 21.
59 *Id.*, pp. 22-23.
60 Energy Storage Proceeding, Comments of NRDC, p. 10.

to consider the creation of any type of credits until an analysis is completed and NYISO confirms the results.

VIII. Conclusion

The Joint Utilities appreciate the opportunity to provide this Reply in response to parties' initial comments on the Roadmap and look forward to continuing to work with the Commission, Staff, NYSERDA, and other parties to realize the value of storage to New York.

Dated: September 24, 2018

Respectfully submitted,

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