VIA ELECTRONIC DELIVERY

Honorable Kathleen H. Burgess
Secretary
New York State Public Service commission
Three Empire State Plaza, 19th Floor
Albany, New York 12223-1350

Re:   Case 18-E-0018 - In the Matter of Proposed Amendments to the State Standardized Interconnection (SIR) for Small Distributed Generators

Case 15-E-0751 - In the Matter of the Value of Distributed Energy Resources

JOINT UTILITIES COMMENTS ON PROPOSED MODEL TARIFF FOR COMPENSATION OF A HYBRID ENERGY STORAGE SYSTEM AND DISTRIBUTED GENERATION SYSTEM

Dear Secretary Burgess:

In response to the direction of the New York State Public Service Commission’s (“Commission”) April 19, 2018 Order Modifying Standardized Interconnection Requirements (“Order”) in the subject proceeding,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”) filed a single joint model tariff for compensation of a hybrid energy storage system (“ESS”) and distributed generation (“DG”) system.2 Please accept this short letter responding to the notice for comments on the model tariff.3

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1 Cases 18-E-0018 et al., In the Matter of Proposed Model Tariff for Compensation of a Hybrid Energy Storage System and Distributed Generation System (“SIR Proceeding”), Order Modifying Standardized Interconnection Requirements (issued April 19, 2018)(“April 2018 Order”), p. 27.
2 SIR Proceeding, Letter to Secretary Burgess from the Joint Utilities (filed June 19, 2018).
3 Comments are due on October 9, 2018. New York State Register, August 8, 2019, I.D. No. PSC-32-18-00017 – P, p. 30

*Admitted only in New Jersey

Consolidated Edison Company of New York, Inc.
4 Irving Place New York NY 10003 212 460 4333 212 677 5850 fax vercheaks@coned.com
The model tariff is based on the Joint Utilities’ earlier proposals in this proceeding to provide four separate technical configurations to developers of hybrid storage projects, each of which is structured to provide environmental and MTC credits only to injections of renewable power. 4 While deferring final approval of the proposals at that time, the Commission, noted that “[i]n principle, the utility proposals meet the needs and goals expressed in the VDER Phase One Order.”5 Timely approval of the model tariff is essential for battery projects that charge from renewable resources to obtain the federal Investment Tax Credit (“ITC”) in 2019. Approval of the hybrid tariff will also fill the gap between stand-alone solar resources and stand-alone battery resources which are either already eligible or will soon be eligible6 for the Value Stack tariffs. Indeed, as the Commission itself observed, the hybrid tariff would “integrate hybrid DG and ESS into utility tariffs.”7 In addition to these specific benefits, the hybrid storage tariff will also help support New York State’s clean energy goals generally8 and specifically for energy storage,9 both of which the Joint Utilities support.

The Joint Utilities appreciate consideration of this reply.

Respectfully submitted,

CONSOLIDATED EDISON COMPANY OF NEW YORK, INC. and ORANGE AND ROCKLAND UTILITIES, INC.

By: /s/ Susan Vercheak

Susan Vercheak
Associate General Counsel
Consolidated Edison Company of New York, Inc.
4 Irving Place
New York, New York 10003
Tel.: 212-460-4333
Email: vercheaks@coned.com

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6 Case 15-E-0751, Order on Value Stack Eligibility Expansion and Other Matters (issued September 12, 2018).
7 SIR Proceeding, April 2018 Order, p. 18.
8 Cases et al., Proceeding on Motion of the Commission to Implement a Large-Scale Renewable Program and a Clean Energy Standard, Order Adopting a Clean Energy Standard (issued August 1, 2016).

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CENTRAL HUDSON GAS AND ELECTRIC CORPORATION

By: /s/ Paul A. Colbert

Paul A. Colbert
Associate General Counsel – Regulatory Affairs
Central Hudson Gas and Electric Corporation
284 South Avenue
Poughkeepsie, NY 12601
Tel: (845) 486-5831
Email: pcolbert@cenhud.com

NIAGARA MOHAWK POWER CORPORATION d/b/a NATIONAL GRID

By: /s/ Janet M. Audunson

Janet M. Audunson Senior Counsel II National Grid
300 Erie Boulevard West
Syracuse, New York 13202
Tel: (315) 428-3411
Email: janet.audunson@nationalgrid.com

NEW YORK STATE ELECTRIC & GAS CORPORATION and ROCHESTER GAS AND ELECTRIC CORPORATION

By: /s/ Mark Marini

Mark Marini Director - Regulatory 89 East Avenue
Rochester, NY 14649
Tel.: (585)750-1666
Email: Mark_Marini@rge.com

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