

**STATE OF NEW YORK
PUBLIC SERVICE COMMISSION**

In the Matter of Modifications to the New York State Standardized Interconnection Requirements and Application Process for New Distributed Generators and/or Energy Storage Systems 5 MW or Less Connected in Parallel with Utility Distribution Systems	Case 24-E-0621
In the Matter of Energy Storage Deployment Program	Case 18-E-0130
Proceeding on Motion of the Commission to Address New York City Reliability Needs	Case 25-E-0764

JOINT UTILITIES' COMMENTS ON NY-BEST PETITION

The Joint Utilities¹ submit these comments in response to the February 20, 2026 New York Public Service Commission (Commission) Notice Soliciting Comments² regarding the New York Battery and Energy Storage Technology Consortium (NY-BEST) petition that was filed on January 13, 2026 (Petition).³ NY-BEST asserts that Consolidated Edison Company of New York, Inc. (Con Edison) has adopted a change in its methodology for evaluating new energy storage interconnections that has improperly limited such interconnections. The Petition asks the Commission to grant relief by: (1) directing Con Edison to revert to its prior evaluation methodology for new energy storage interconnections; (2) directing Con Edison to allow new projects to be evaluated using curved charging profiles; and (3) initiating a stakeholder process to reform and improve Con Edison's interconnection and market rules.

¹ The Joint Utilities are Central Hudson Gas & Electric Corporation, Consolidated Edison Company of New York, Inc. (Con Edison), 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.

² Cases 18-E-0130 et al., *In the Matter of Energy Storage Deployment Program* (Energy Storage Proceeding), Notice Soliciting Comments (issued February 20, 2026).

³ Energy Storage Proceeding, Energy Storage in Con Ed – Call for Immediate Relief by New York Battery and Energy Storage Technology Consortium (NY-BEST) (filed January 13, 2026) (Petition).

Although the Petition focuses on interconnection of energy storage projects within Con Edison’s service area, changes to New York State (NYS) Standardized Interconnection Requirements (SIR) processes affect all the Joint Utilities. The Petition requests unnecessary measures, and for the reasons discussed below,⁴ the Commission should deny the requests set out in the Petition.

The Commission has already settled the legal and jurisdictional framework governing utility interconnection practices. Commission precedent clearly recognizes utilities’ authority—and obligation—to maintain their respective electric power systems, as part of the utilities’ obligation to provide safe, adequate, and reliable service, and to apply engineering judgment in the administration of interconnection processes.⁵

Moreover, there are several open stakeholder forums as well as open proceedings,⁶ notwithstanding those captioned above, where the interconnection process and value of energy storage are being addressed. These existing proceedings are appropriate for policy discussions so as to ensure that overlapping issues are considered holistically. Creating an additional, stakeholder process risks duplicative efforts, regulatory inconsistencies across New York State, and stakeholder fatigue.

⁴ The absence of a Joint Utilities’ response to every assertion in the Petition should not be construed as agreement with the Petition’s characterizations or claims.

⁵ Cases 20-E-0543 et al., *Petition of Interconnection Policy Working Group Seeking a Cost-Sharing Amendment to the New York State Standardized Interconnection Requirements*, Order Directing Interim Modifications to the New York State Standardized Interconnection Requirements (issued March 18, 2021), p. 11, note 15, where the Commission has determined that “Qualifying Upgrades shall be limited to those which result in an increase to the hosting capacity of the Utility’s distribution system beyond that required to interconnect the Triggering Project. Utilities may make this determination on the basis of completed CESIRs [Coordinated Electric System Interconnection Reviews], or through their engineering judgment when considering the pending applications.” See also New York State Standardized Interconnection Requirements (SIR) (effective August 1, 2025), Appendix E, p. 5.

⁶ Additional open regulatory proceedings not captioned in the Notice that address energy storage include, but are not limited to, Case 15-E-0751, *In the Matter of the Value of Distributed Energy Resources* (VDER Proceeding); Case 25-E-0764, *Proceeding on Motion of the Commission to Address New York City Reliability Needs*; and Case 19-E-0283, *Proceeding on Motion of the Commission to Examine Utilities’ Marginal Cost of Service Studies* (MCOS Proceeding).

While stakeholder processes can provide valuable input to policy development and implementation, utilities must also be able to take timely actions to operate the electric power system consistent with Commission-approved requirements. This includes the utility retaining responsibility for establishing and applying electric system reliability standards. In addition, adjustments to planning and engineering practices can shift costs from energy storage developers to electric customers for infrastructure that would not otherwise be needed absent developers' proposed energy storage projects.

Establishing a separate stakeholder process focused on Con Edison's interconnection and market rules would be duplicative, add unnecessary complexity, and provide less benefit than addressing these issues on a statewide basis through other open proceedings. The Joint Utilities respectfully recommend that NY-BEST raise its concerns through those established forums and that the Commission reject the Petition.

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Respectfully submitted,

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