



Nikolai Albert T. M. Wolfe, Esq.
Senior Attorney

October 16, 2024

VIA ELECTRONIC FILING

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

Re: Case 18-E-0130 – In the Matter of Energy Storage Deployment Program

Joint Utilities’ Filing Deadline Extension Request

Dear Secretary Phillips:

On June 20, 2024, the NYS Public Service Commission (“Commission”) issued its Order Establishing Updated Energy Storage Goal and Deployment Policy in the subject proceeding.¹ Pursuant to Ordering Clause No. 20 therein,² the Joint Utilities³ are directed to study the non-market transmission and distribution services that energy storage can provide and file the results of this study (“Report”) within 120 days (*i.e.*, by October 18, 2024). The Joint Utilities share the Commission’s goal of exploring the potential of energy storage to serve as a transmission and distribution asset. Accordingly, the Joint Utilities respectfully request an extension until October 29, 2024, to adequately do so.

As discussed in the body of the 2024 Storage Order, the Report includes an in-depth engineering and economic review of the applications that energy storage could provide to a utility as it fulfills its obligations to provide safe and reliable service in the most efficient and effective manner.⁴ The Report will also include a determination of how utilities’ system planning and

¹ Case 18-E-0130 *In the Matter of Energy Storage Deployment Program*, Order Establishing updated Energy Storage Goal and Deployment Policy (issued June 20, 2024) (“2024 Storage Order”).

² *Id.*, pp. 96-97.

³ The Joint Utilities are 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 & Rockland Utilities, Inc., and Rochester Gas and Electric Corporation.

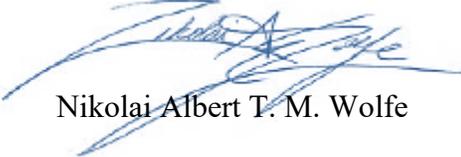
⁴ 2024 Storage Order, pp. 66-67.

operating procedures would be modified to incorporate energy storage as an alternative. Further, the Joint Utilities will propose a process for the review and approval of such projects, including a cost recovery mechanism - to the extent that such a process does not align with the normal rate case schedules. The Joint Utilities continue to work actively and collaboratively to submit a comprehensive filing and believe that a modest extension is needed to fully respond to the Commission's directives.

For the reasons outlined above, as well as to advance the role of energy storage solutions in New York State's clean energy transition, the Joint Utilities request that you grant an extension of the current filing deadline in Ordering Clause No. 20 from October 18, 2024, to October 29, 2024.⁵

Please do not hesitate to contact me with questions.

Respectfully submitted on behalf of
the Joint Utilities,



Nikolai Albert T. M. Wolfe

⁵ Pursuant to Ordering Clause No. 34 of the 2024 Storage Order, the deadlines set forth therein may be extended in the Secretary's sole discretion.