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Via Electronic Filing

New York State Public Service Commission

Case 25-E-0764: Proceeding on Motion of the Commission to Address New York City Reliability Needs

Case 24-E-0621: 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 18-E-0130: In the Matter of Energy Storage Deployment Program

Comments in support of the New York Battery and Energy Storage Technology Consortium (NY-BEST) January 13, 2026 petition for immediate relief and interconnection reform in Con Edison's service territory.

ABOUT NEW YORKERS FOR CLEAN POWER

New Yorkers for Clean Power (NYCP) is a statewide collaborative campaign aimed at rapidly transitioning to a clean energy economy. Through science-based research, education, advocacy, and organizing, NYCP seeks to advance a range of clean energy, building decarbonization, and clean transportation solutions, while also creating jobs in these industries for all communities in New York. We are vested in helping communities realize a clean energy future, and we are especially dedicated to bringing the economic and health benefits of clean energy that battery energy storage systems provide by enhancing and supporting our electrical grid.

NEW YORK CITY URGENTLY NEEDS BATTERY ENERGY STORAGE

New York City faces several urgent energy challenges: growing reliability shortfalls, rising electricity costs, and the continued operation of fossil fuel peaker plants that have long

concentrated air pollution in low-income communities and communities of color. Battery energy storage is uniquely positioned to address all three challenges simultaneously by providing reliable capacity, lowering costs for ratepayers, and enabling the retirement of dirty peaker plants as required under State law.

NYSERDA's Energy Storage Roadmap¹ calls for at least 2,000 MW of storage in New York City's Zone J by 2030, growing to 4,600 MW by 2035. The urgency of that buildout cannot be overstated:

- Battery storage can defer or replace costly infrastructure investments. Analysis of a single substation project in Con Edison's capital plan found that deploying battery storage instead would save ratepayers approximately \$1.95 billion over ten years.²
- Statewide deployment of 6 GW of storage by 2030 would yield an estimated \$1.94 billion in net societal benefits through avoided electricity system costs, according to NYSERDA's 6 GW Energy Storage Roadmap.
- A March 2026 PowerGEM study³ found that energy storage can meet the reliability needs Con Edison recently identified for New York City — while saving ratepayers money and reducing emissions at the same time.
- A January 2026 Synapse Energy Economics study⁴ found that meeting New York's storage and solar deployment goals would save ratepayers \$1 billion per year statewide through wholesale price suppression alone.

The storage projects currently in Con Edison's interconnection queue represent significant progress toward these goals and should not be portrayed by the utility as a burden to ratepayers.

CON EDISON'S INTERCONNECTION CHANGES ARE CAUSING IRREPARABLE HARM

Beginning in August 2025, without Commission approval or stakeholder input, Con Edison unilaterally changed the methodology it uses to evaluate battery energy storage interconnection applications. This has rendered most new storage projects economically unviable across the majority of New York City. The consequences are already severe:

- At least 25 storage projects totaling 153 MW have already been cancelled, with at least 91 additional projects totaling 446 MW at risk of cancellation in the near future.
- At least 34 projects totaling 161 MW saw their interconnection costs increase by an average of 14 times after the methodology was applied retroactively to projects that had already received favorable interconnection results.
- Low-income households enrolled in utility energy assistance programs are losing access to direct bill credits that would have been provided by these projects through the Statewide

¹ <https://www.nyserda.ny.gov/-/media/Project/Nyserda/Files/Programs/Energy-Storage/Energy-Storage-Roadmap.pdf>

² <https://nine.energy/wp-content/uploads/New-York-Energy-Storage-Roadmap-Comments-NineDot.pdf>

³

<https://documents.dps.ny.gov/public/Common/ViewDoc.aspx?DocRefId=%7BE0B92B9D-0000-CD3E-83AB-680FCB4E0C80%7D&DocTitle=Ability%20of%20Energy%20Storage%20to%20Address%20Transmission%20Reliability%20Needs%20in%20New%20York%20City>

⁴ <https://www.synapse-energy.com/sites/default/files/SolarStorageBenefitsNY%2025-113.pdf>

Solar for All program.⁵

Con Edison's new interconnection methodology rests on flawed assumptions, particularly by assuming all storage must charge simultaneously during the same static overnight window; this does not reflect how storage actually operates. Con Edison already has tools, including implementing curved charging and/or a wider charging window, to manage charging behavior. The utility could also take advantage of technologies like SCADA control and Direct Transfer Trip to curtail charging as needed in a rare contingency event. The Commission should direct Con Edison to work with stakeholders to meaningfully evaluate alternatives to the new methodology that would enable storage to maximize benefits to the grid.

The Commission should also examine whether Con Edison's current financial incentive structure (which rewards capital investment in traditional infrastructure while providing no comparable return for facilitating third-party storage interconnections) is contributing to this outcome. As the Brattle Group concluded in a March 2026 study,⁶ updating performance incentives, cost-recovery rules, and planning requirements can reward utilities for least-cost outcomes and ensure benefits are shared with ratepayers.

THE COMMISSION SHOULD ACT IMMEDIATELY

New Yorkers for Clean Power urges the Commission to take the following actions without delay, consistent with the requests in NY-BEST's January 13, 2026, filing:

- Immediately direct Con Edison to revert to its pre-August 2025 CESIR interconnection methodology, eliminating the arbitrary 70% substation capacity threshold.
- Initiate a 6–12 month stakeholder reform process to update interconnection and market rules so that energy storage is treated as the flexible, controllable reliability resource it is.
- Reform utility incentive structures to align Con Edison's financial interests with cost-effective outcomes for ratepayers.

Every month of delay in resolving this interconnection impasse means more cancelled projects, more ratepayer costs, and more time that fossil fuel peaker plants continue operating in communities that have long borne an unfair share of pollution. The Commission has the authority and obligation to act. We urge it to do so now.

Respectfully submitted,

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⁵ <https://www.nyserda.ny.gov/All-Programs/NY-Sun/Community-Solar/Statewide-Solar-for-All>

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<https://www.brattle.com/insights-events/news/new-brattle-report-finds-better-utilization-of-existing-power-grid-could-save-us-consumers-more-than-100-billion-in-the-next-decade/>