



May 4, 2026

Hon. Michelle L. Phillips, Secretary  
New York State Public Service Commission  
3 Empire State Plaza  
Albany, New York 12223-1350  
[secretary@dps.ny.gov](mailto:secretary@dps.ny.gov)

**Re: 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**

Dear Secretary Phillips:

Advanced Energy United submits for filing the attached Joint Comments addressing the New York Battery and Energy Storage Technology Consortium Petition requesting the New York Public Service Commission to direct Consolidated Edison Company of New York, Inc to lift newly imposed restrictions on energy storage in Con Edison's service territory.

Respectfully submitted,

/s/ Shamay Phillips  
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# Advanced Energy United Comments

**Re: 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**

Advanced Energy United (“United”) submits for filing the attached joint comments in response to the New York Battery and Energy Storage Technology Consortium (“NY-BEST”) Petition (“Petition”) requesting the New York Public Service Commission (“Commission”) to direct Consolidated Edison Company of New York, Inc.’s (“Con Edison”) to lift newly imposed restrictions on energy storage in Con Edison’s service territory.

United is a national association of businesses that works to accelerate the move to 100% clean energy and electrified transportation in the U.S. The term advanced energy encompasses a broad range of products and services that constitute the best available technologies for meeting our energy needs today and tomorrow. These include electric vehicles, energy efficiency, demand response, energy storage, solar, wind, hydro, nuclear, heat pumps (air- and ground-sourced), and smart grid technologies. United represents more than 100 companies in the \$374 billion U.S. advanced energy industry, which employs 4.1 million U.S. workers and over 231,600 in the state of New York.

United supports the rapid deployment of distributed energy resources (“DERs”), including energy storage. These are essential tools to maintain grid reliability, put downward pressure on rates and achieve New York’s clean energy and electrification goals. There is a strong body of evidence suggesting that system-wide benefits of grid DER deployment outweigh



interconnection upgrades. In January 2026, Synapse Energy Economics published a New York-specific study, which found that meeting New York’s energy storage deployment goals and deploying 20 GWdc of distributed solar by 2035 would save ratepayers \$1 billion per year through wholesale price suppression. The Synapse study estimates that achieving this level of DER deployment will provide \$542M in annual savings in Upstate NY, and an additional \$481M Downstate, with savings distributed relatively evenly across the seasons.<sup>1</sup>

While United recognizes Con Edison’s obligation to maintain grid reliability and protect ratepayers, the new changes that impact energy storage were implemented without stakeholder participation, falling short of a regulatory process, and may have created barriers to distributed energy storage development.

We support NY-BEST’s request for the Commission to initiate a 6–12-month stakeholder-based reform process to improve Con Edison’s interconnection and market rules, and realign utility incentive structures to ensure cost-effective outcomes for ratepayers in close coordination with the ongoing proceeding in Case 15-E-0751 In the Matter of The Value of Distributed Energy Resources (“VDER”) to inform the demand reduction value (“DRV”) and locational system relief value (“LSRV”) portions of the VDER value stack. While the petition primarily calls for immediate reversal of Con Edison’s changes to their Coordinated Electric System Interconnection Review (“CESIR”) process, we believe the most impactful long-term solution can only be achieved through a collaborative framework that moves beyond unilateral utility action. Through a mandated a formal stakeholder engagement process, the Commission can ensure that interconnection process is transparent and aligned with New York’s long-term reliability and affordability objectives.

We appreciate the opportunity to submit these comments and look forward to continued collaboration.

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<sup>1</sup> Reply Comments of the Clean Energy Parties *Regarding the Staff Proposal of Updating DRV and LSRV VDER Compensation*, Case 15-E-0751, p. 10 -11.

