



March 20, 2023

VIA ELECTRONIC MAIL

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

Re: Case 18-E-0130

Dear Secretary Phillips,

The New York Solar Energy Industries Association (NYSEIA) appreciates the opportunity to provide comments in response to the New York 6 GW Storage Roadmap. Energy storage is critical to New York's decarbonization effort, and will need to be deployed at all levels of the electric system, including the bulk, retail, and residential levels, in order to dynamically balance intermittent renewables and provide systemic, community and individual resilience benefits. Energy storage can also be deployed strategically to defer expensive transmission and distribution upgrades, to increase hosting capacity by time-shifting renewable exports, and to replace fossil fuel peaker plants with non-emitting technology. Overall, NYSEIA supports the roadmap and appreciates the thoughtful approach that the proposal takes to the bulk, retail and residential market segments. We also appreciate that the roadmap seeks to focus investment in low-income and environmental justice communities in order to comply with the Climate Act, and more importantly, so these communities receive an equitable share of the benefits of these investments. The program cost is modest, and the environmental, resilience and economic benefits are significant.

NYSEIA respectfully submits the following comments and recommendations for consideration.

Thank you,

Noah Ginsburg
Executive Director
New York Solar Energy Industries Association