

November 7, 2017

Solar and Storage Industry Comments on NYSIR Technical Screen Updates Related to Storage

The critical key issues we identified as needing to be further addressed regarding a general potential update of the existing Screens A-I for preliminary and supplemental review were detailed in our "Solar Industry Comments on EPRI Final Report from November 6, 2017" and apply to both solar and storage.

Beyond those issues, the Solar and Storage Industries see two technical screening items that need to be addressed for electrical energy storage specifically. These are:

1. Deciding on how the max import/load specified by the applicant should be studied and how this is specified or referenced in the SIR
2. Updating the minimum load used in Screen G for projects that include storage, if that screen is updated to be more accurate per technology as previously recommended

The Max Import/Load Studied Should be that Specified By the Applicant, Not the Nameplate of the Storage

The Solar and Storage Industries understand this approach to already be the consensus of the group, but to avoid any confusion, we wanted to reiterate it here. We see the max import/load that will be studied to simply be that specified by the Applicant and enforced by an approved control scheme, and that it should not be the nameplate of the storage equipment.

The Max Import/Load Specified Should be Studied Exactly As Utilities Study Other Loads Added to the Distribution System, and Thus a Reference to Those Existing Utility Rules Should Be Added to the SIR and Those Rules Should Be Made Transparent and Standardized in a Guidance Document

The Solar and Storage Industries see two options for how review of the max import/load specified by the applicant could be addressed: 1) The relevant screens of those currently existing in the SIR for generation (Screens A-I) could be selected and then used to screen load or 2) the SIR could reference existing utility practice for reviewing load across their systems, and if that is not currently written up publicly by utility and standardized to an extent across the state, then a guide could be created and referenced as has been done in other jurisdictions like California. As the Solar and Storage Industries strongly believe it is critical that the load from storage be studied just like any other load would be that is being added to the distribution system (i.e. DER related loads should not be singled out for special

treatment), we see the second approach as the most clear and effective way to ensure that and thus strongly recommend that.

Screen G Should Be Updated to Be More Accurate Per Technology and Projects With Storage Should Be Studied Using Absolute Minimum Load

Currently in Screen G, the absolute minimum load is used for all technologies and thus is appropriate for evaluating all DER projects including solar and storage or stand-alone storage. If as we have recommended previously and is best practice across many other jurisdictions, the minimum load used in Screen G is updated to the daytime minimum for solar projects, then we would recommend specifying the use of the absolute minimum load for projects that involve storage.