January 14, 2026

Via Electronic Filing

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

Re: **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.

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

Dear Secretary Phillips:

New York State is making significant progress towards achieving its nation-leading goal of six gigawatts of energy storage by 2030, and as a result, Con Edison is observing rapid growth in battery energy storage system (BESS) interconnection requests within its service territory. As New York State's energy storage programs work towards supporting a market for BESS to integrate renewable energy, increase customer resilience, and meet reliability needs, the rapid growth of BESS is also creating upstream capacity constraints in certain areas, including at or upstream of the area substation level. To promote transparency and efficient administration of BESS interconnections, and to assist developers in navigating the statewide interconnection process, this notice provides information on current upstream constraints, how those constraints impact interconnection requests, and related hosting capacity criteria.[1] Con Edison continues to process interconnection requests and execute agreements with storage developers, notwithstanding the significant increase in BESS interconnection activity.

[1] This notice is exclusively for BESS projects regulated by the New York State Standardized Interconnection Requirements (SIR). Projects regulated by the SIR are distributed generation, stand-alone energy storage systems, or combined generation and energy storage system facilities 5 MW or less connected in parallel with utility distribution systems.

I. Network Constraints in Con Edison's Service Territory

As of December 31, 2025, there are approximately 115 megawatts (MW) of operational BESS and 865 MW of BESS with executed interconnection agreements in Con Edison's service territory. Con Edison's interconnection queue for BESS projects five megawatts or less totals approximately 2,500 MW, representing a 300% increase over two years.[2] To put this number of MW into perspective, the peak load demand for Zone J in 2024 was approximately 10,000 MW. Much of the growth in the queue occurred recently. In the second quarter of 2025, the SIR-regulated BESS project queue grew by 700 MW, which was a 55% increase.[3] Con Edison believes the queue may continue to grow as developers respond to price signals such as those embedded in Value of Distributed Energy Resources (VDER or Value Stack) compensation as well as the introduction of additional blocks of Retail Energy Storage Incentives from the New York State Energy Research and Development Authority.

BESS projects are not spread evenly across Con Edison's service area but instead are clustered in areas where land costs and zoning make building storage projects more affordable for developers; 65% of the MW in the queue are supplied by 10 of the Company's 63 substations. While BESS projects generally seek to charge overnight during times that are currently off-peak and when charging rates are cheaper, the cumulative impact of overnight charging across many clustered BESS projects can create new overnight load area peaks that exceed the current daytime peak. In numerous cases, new overnight peaks would exceed the Company's reliability thresholds, and therefore additional BESS charging load would require buildout of new utility infrastructure at the area substation or sub-transmission level to increase Hosting Capacity, which would not be required but for the BESS.[4] As a result of the rapid growth in BESS interconnection requests, as of this writing there are over 20 substations at or near Hosting Capacity limits.[5]

The emergence of new overnight peaks resulting from a high volume of clustered BESS in the interconnection queue is a dramatic change in the BESS market in the Company's service

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[2] This operational and queue data is limited to SIR-regulated BESS projects and does not include upwards of 300 MW of non-SIR or bulk storage projects in the queue in the Company's service territory.

[3] Queue data is maintained at this website for SIR-regulated projects: https://dps.ny.gov/distributed-generation-information

[4] Under the SIR at Section III, Hosting Capacity refers to "[t]he amount of distributed energy that can be interconnected without requiring electric infrastructure upgrades or adversely affecting power quality or reliability under current configurations."

[5] Appendix 1 to this notice contains a list of substations with capacity constraints, which includes area substations with 0-25MW of available capacity.

territory. Because there is a large volume of projects clustered in specific areas, there could be, for the first time, significant impacts from BESS charging on infrastructure upstream of primary feeders, such as at area stations and sub-transmission infrastructure. In response to these conditions, Con Edison was required to refine its engineering analysis for impacts to upstream infrastructure to ensure that BESS charging load does not create reliability or power quality issues at those upstream assets.

On August 15, 2025, Con Edison informed developers about capacity constraints at specific substations and explained that proposed projects without executed interconnection agreements required further evaluation. The Company repeated this communication to developers on August 18, 2025 and, on September 16, 2025, informed developers of emerging capacity constraints in certain other areas. On November 21, 2025, the Company provided BESS developers with further details on Hosting Capacity levels. These communications and a slide deck providing further information on energy storage constraints are included in **Appendix 1.** Notwithstanding the Company's refined engineering analysis, interconnection applications have been and continue to be processed and projects with executed interconnection agreements are able to move forward to implementation.

II. Coordinated Electric System Interconnection Review Process

Under the statewide interconnection process, or the SIR, a key step is the issuance by the utility of a Coordinated Electric System Interconnection Review (CESIR).[6] A utility delivers a CESIR to an interconnection applicant following a Preliminary Screening Analysis and after the applicant has completed the administrative steps required to reach the CESIR stage of the interconnection process.[7] The CESIR must include a description of system impacts, required upgrades, and "a good faith, detailed estimate of the total cost of completion of the interconnection of the proposed system and/or a statement of cost responsibility for any system upgrades and associated equipment deemed necessary for interconnection of the project."[8]

[6] Under the SIR at Section III, CESIR is defined as "[a]ny studies performed by utilities to ensure that the safety and reliability of the electric grid with respect to the interconnection of distributed generation as discussed in this document."
[7] This is described in the SIR at Section I. C., Steps 1-5.
[8] SIR at Section I. C., Step 6.

A. Cost Allocation & Qualifying Upgrades

The SIR requires utilities to "clearly identify" upgrade costs that the utility would not incur but for an interconnection request[9] and to assign those costs to the project developer.[10] Under the SIR, certain upgrades are Qualifying Upgrades, which are upgrades required for a developer to interconnect but that increase Hosting Capacity beyond the developer's need, such as construction of a new area station.[11] Under the Commission's Cost Sharing Order,[12] a Qualifying Upgrade is funded on a *pro rata* basis "whereby the applicant pays only for the specific distribution hosting capacity assigned to its project for these types of system modifications."[13] The cost of a Qualifying Upgrade is allocated to the Triggering Project,[14] which is the project that requires the Qualifying Upgrade, and Sharing Projects,[15] which are later queued projects that benefit from incremental Hosting Capacity that would be created as a result of the Qualifying Upgrade (collectively Participating Projects). Thus, the SIR requires utility infrastructure costs to be allocated to Participating Projects when the required Qualifying Upgrade, which may be a new area station, would not be required "but for" the Participating Projects.

The SIR's "but for" funding requirement is consistent with cost causation principles and sound policy. New system infrastructure that would not be required but for BESS projects can range from new transformers and associated supply lines at existing area stations, which can cost approximately $100 million or more, to construction of new area stations or sub-transmission, which can cost over $1 billion for each infrastructure investment.[16] The SIR ensures that project

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[9] SIR at Section I.A.

[10] The term developer is used here to generally refer to interconnection applicants under the SIR.

[11] Under the SIR at Section III, Qualifying Upgrades are "[s]ystem modifications which result in an increase to the Hosting Capacity of the utility's distribution system beyond that required to interconnect a Triggering Project that can be shared by multiple Distributed Generation/Energy Storage System projects and whose costs are greater than $250,000."

[12] Case 20-E-0543, et al., *Petition of Interconnection Policy Working Group Seeking a Cost-Sharing Amendment to the New York State Standardized Interconnection Requirements,* Order Approving Cost-Sharing Mechanism and Making Other Findings (July 16, 2021) (Cost Sharing Order).

[13] SIR at Appendix E, page 2. "A pro rata approach consists of taking the estimated cost of an upgrade and dividing that cost by the total increased Hosting Capacity created by the upgrade, thereby creating a dollar per kW cost which will then be multiplied by an individual project's AC nameplate rating in kW to determine the applicant's pro rata cost share."

[14] Under the SIR at Section III, a Triggering Project is "[t]he application in the queue at a given substation or feeder whose proposed interconnection triggers the need for a Qualifying Upgrade."

[15] Under the SIR at Section III, a Sharing Project is "[a] project that benefits from and contributes to the cost of a Qualifying Upgrade holding an interconnection queue position after the Triggering Project."

[16] For example, the cost for a transformer addition to a new area station can significantly vary depending on a number of variables, including whether a new underground transmission line is needed, the length of that line, and whether certain obstacles like river crossings or highways are present.

developers can make investment decisions for their projects based on the interconnection upgrade costs required for their projects.[17]

B. Hosting Capacity Methodology

The SIR does not prescribe the reliability criteria for determining when a Qualifying Upgrade or additional Hosting Capacity is required; rather, the Commission has directed utilities, who are responsible for maintaining system reliability, to identify Qualifying Upgrades, and thus determine Hosting Capacity, either based on completed CESIRs or by using their "engineering judgment."[18] As stated in the SIR, "[w]henever the utility determines that a substation Qualifying Upgrade is required to interconnect a Triggering Project, the utility will promptly discuss its finding with the applicant."[19]

Con Edison's interconnection procedures cautioned that BESS charging should not occur during network peak periods and that additional engineering consultation was required if a project's charging would overlap with a peak period. When queued BESS charging load posed, for the first time, a risk of creating new overnight peaks and straining upstream infrastructure, Con Edison—consistent with its procedures—consulted its distribution engineering group and refined its engineering analysis to evaluate upstream impacts. This engineering analysis aimed to protect system reliability at the area station and sub-transmission level, which historically had not experienced material impacts from BESS charging load, while supporting a continued active market for BESS development. The Company informed developers on August 15 and August 18 of the resulting capacity constraints, as stated in Section I, and copies of these communications are included in **Appendix 1**.

The Company's analysis culminated in October 2025 by refining existing engineering procedures to include a two-step conditional test for determining the Hosting Capacity at area

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[17] As stated in the SIR at Appendix E, p. 8, utilities will proceed with construction once 25% or 75%, depending on the upgrade, of the estimated Qualifying Upgrade Cost has been paid by Participating Projects, which may introduce some ratepayer exposure to the cost of a Qualifying Upgrade. However, "[t]o mitigate the risk to utility customers, unrecovered costs shall be capped at 2% of a utility's distribution/sub-transmission electric capital investment budget per fiscal year, after which any Qualifying Upgrades would require full (100%) funding from Triggering Projects and Sharing Projects prior to utility mobilization for such projects' construction work."

[18] Case 20-E-0543, et al. *Petition of Interconnection Policy Working Group Seeking a Cost-Sharing Amendment to the New York State Standardized Interconnection Requirements*, at footnote 15 (March 18, 2021) ("Qualifying Upgrades shall be limited to those which result in an increase to the hosting capacity of the Utility's distribution system beyond that required to interconnect the Triggering Project . . . Utilities may make this determination on the basis of completed [Coordinated Electric System Interconnection Reviews (CESIRs)], or through their engineering judgment when considering the pending applications.").

[19] SIR at Appendix E, page 5.

stations or sub transmission assets to support BESS charging. Under that test, Con Edison determines if a BESS project's charging will cause a local peak or exceed reliability limits and only requires upstream upgrades if it does both. Specifically, Con Edison considers whether the project's charging operations will: (1) create an area station or sub-transmission peak; and (2) exceed area station or sub-transmission reliability capacity thresholds.[20] Con Edison employs a 70% area station and sub-transmission feeder reliability capacity threshold for test (2) to mitigate system derates and reduction of equipment life, and to continue to provide safe and reliable service. This test is being applied by modeling the BESS operations using the current annual peak day at the area station and/or the sub transmission infrastructure.

- There is sufficient Hosting Capacity if the BESS passes test (1) and its charging load does not create an area station or sub-transmission peak, whether or not it passes test (2). **Test (2) is only relevant for projects that create an area station or sub-transmission peak.**
- There is sufficient Hosting Capacity if the BESS fails test (1) and its charging load creates an area station or sub-transmission peak but passes test (2), and does not exceed area station or sub-transmission reliability capacity thresholds.
- Only if the BESS fails both test (1) and (2), creating an area station or sub-transmission peak and its charging load exceeds area station or sub-transmission reliability capacity thresholds, then Hosting Capacity has been exceeded, and upstream upgrade(s) will be required to accommodate the proposed project.

This two-step conditional test maximizes the quantity of BESS that can be reliably interconnected while minimizing the number of projects that trigger Qualifying Upgrades, which, as described in Section II.A., tend to be costlier types of upgrades. Exceeding the reliability capacity thresholds alone does not trigger upstream upgrades, unless the project also creates a peak under test (1). Thus, sequentially considering whether a project will pass test (1) prior to test (2) benefits BESS projects by enabling use of the planning processes and related infrastructure that the Company has in place for managing load while also preserving grid reliability. **Attachment 2** contains illustrative examples of this two-step conditional test. The Company will continue to exercise its engineering judgement to determine Hosting Capacity, in compliance with the process prescribed by the SIR, thus ensuring reliable service under changing conditions. Establishing reliability

[20] This is referred to as a "qualifying upgrade threshold" in the PowerPoint included in Appendix 1 at slide 18.

criteria when determining Hosting Capacity is incumbent on every utility, which must use its engineering judgment based on the unique needs, architecture, design, and dynamic conditions of its system.

III. Ensuring Safe and Reliable Service at Just and Reasonable Rates

Con Edison's Hosting Capacity threshold preserves safe and reliable service today, as required by the SIR. Ensuring compliance with the SIR by allocating costs to projects for infrastructure upgrades that would not be required but for the interconnecting projects provides appropriate price signals for sustainable BESS development while also continuing to safeguard customers from rising costs and affordability concerns. In addition, overloaded substations could impede the Company's ability to energize new load service and interconnection requests in a timely fashion. Con Edison's Hosting Capacity threshold for BESS charging load at the area station level protects against these negative outcomes in addition to continuing to maintain system reliability levels.

Upgrade costs in constrained networks may be cost prohibitive for some Triggering Projects, which may understandably result in increased concern and inquiries from BESS project developers and industry groups. But the SIR's long-standing cost allocation requirements are designed to provide project developers with the information they need to develop projects while balancing the need to protect electric customers from paying for infrastructure that would not be required but for BESS and other SIR-regulated distributed generation.[21] The SIR's cost allocation rules place these investment decisions in the hands of the party positioned to weigh the costs and benefits of different approaches to serving customers. Most SIR-regulated BESS projects will seek to earn revenues under VDER or Value Stack compensation. A component of the Value Stack is the Demand Reduction Value (DRV), which is intended to compensate projects for avoided distribution-level infrastructure costs.[22] In cases where adding new BESS charging load would exceed area station Hosting Capacity, the SIR's cost allocation rules ensure that customers are not required to fund infrastructure upgrades required to install those BESS projects through rates and then pay those same projects ostensibly for avoided infrastructure costs through DRV revenue.

[21] Cost Sharing Order at 17.

[22] Case 15-E-0751, et al., *In the Matter of the Value of Distributed Energy Resources*, Order on Phase One Value of Distributed Energy Resources Implementation Proposals, Cost Mitigation Issues, and Related Matters, at 10 (September 14, 2017).

IV. Conclusion

Con Edison remains committed to transparency, collaboration, and compliance while supporting New York's clean energy goals. Developers are encouraged to review hosting capacity maps and consider project siting strategies that align with available capacity. Looking ahead, the Company will work with energy storage developers and other stakeholders to consider how future price signals and other areas impacting BESS viability can best be designed to effectively and efficiently direct storage development to the most beneficial locations on the grid. Future Company filings may address these policy proposals and propose methods to more effectively interconnect BESS projects.

For questions or additional information, please contact: dgexpert@coned.com.

Sincerely,

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Appendix 1

Energy Storage Constraints

November 14, 2025

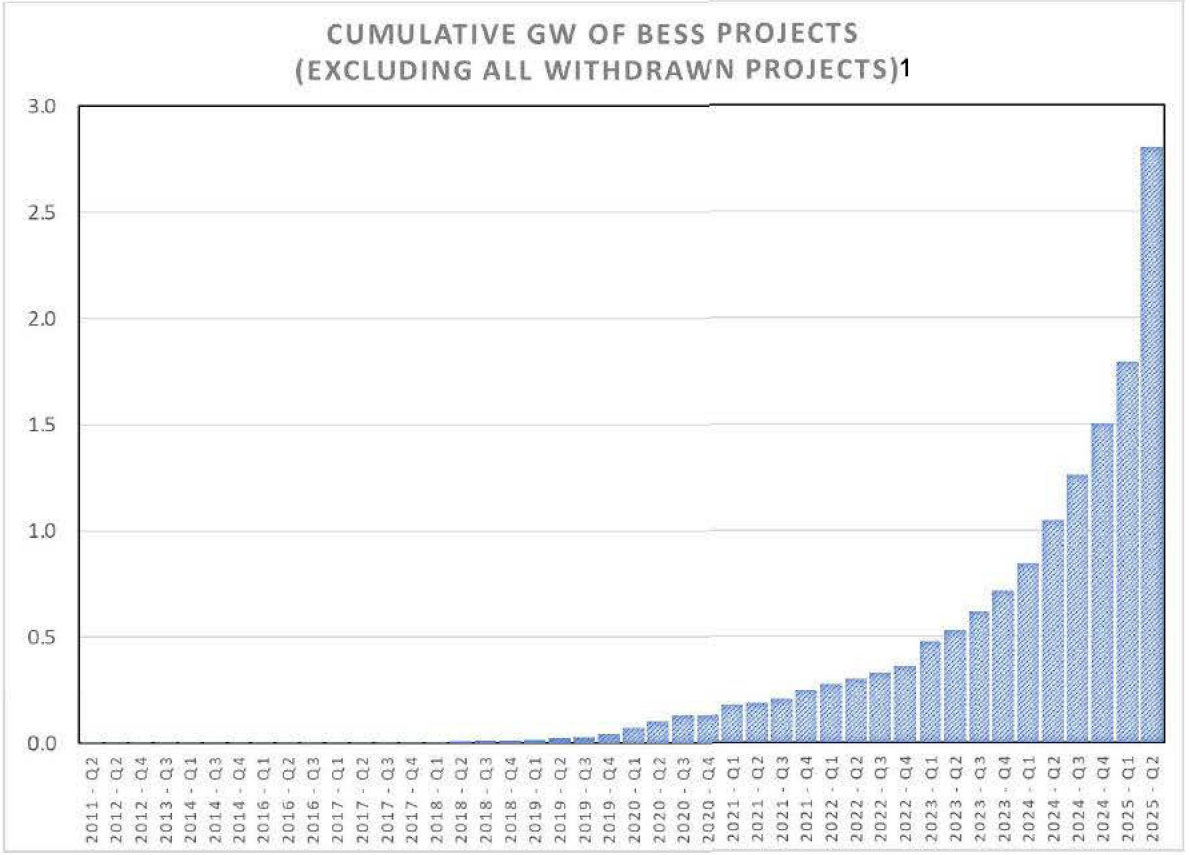
Agenda

- Context: Recent market surge and grid impacts
- Upstream constraints at area stations or sub-transmission in constrained areas
- CESIR study methodology addressing upstream constraints
- Estimated hosting capacity at the substation level
- Clarifications on information shared to date
- Closing: Our commitment to supporting the battery energy storage market and next steps

Exponential growth in robust energy storage queue has taken off in recent months

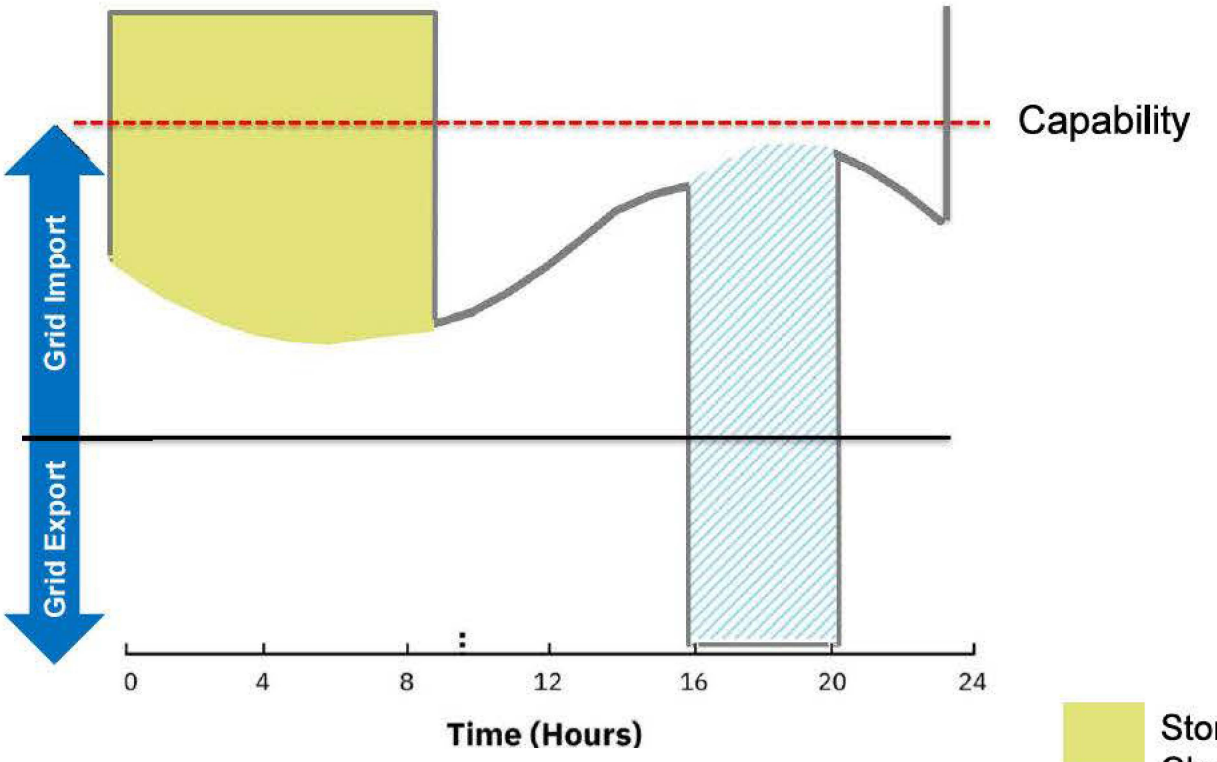
Battery Energy Storage System (BESS) Growth

- Successful state and federal policies promoting energy storage has led to exponential growth in a short period
- **~5.3x (+430%)** interconnection request growth over the last two years
  - 50% growth in Q2 alone of 1 GW
- Exponential growth underscores the importance of comprehensive evaluation of impacts to the grid, with large numbers of projects coming online in clustered areas



1.Sum of all discharge nameplate capacity

We are seeing that overnight charging can create new network peaks and daytime export can cause backfeed



We will be issuing about 150 CESIR studies in saturated areas from beginning of November through end of 2025

Storage Import/ Charging

Storage Dispatch/ Discharging

We have identified saturated and emerging areas

Saturated Areas: As energy storage projects in the application queue today begin operating, their overnight charging, in aggregate, will lead to exceeding substation and/or sub-transmission capability

Emerging Areas have been identified, where overnight energy storage charging can become limited in the future due to lower overnight charging capacity, sometimes due to shallow overnight troughs

Area
Fresh Kills
Glendale
Brownsville 1&2
Newtown-Glendale-Amtrak
Washington Street
Ossining West
Brownsville No. 2
Mott Haven
Woodrow
Millwood West
Fox Hills
Bruckner
Parkchester No. 2
Wainwright
Corona No. 1
East 179th Street
Bensonhurst 1&2
Corona No. 2
Greenwood
East 75th Street
Jamaica
Granite Hill
Water Street
Hellgate
Avenue A
Willowbrook
West 19th Street
Grasslands
West 110th Street No. 2

If all storage projects in the queue were built, grid capability would be exceeded in 2029 in some areas

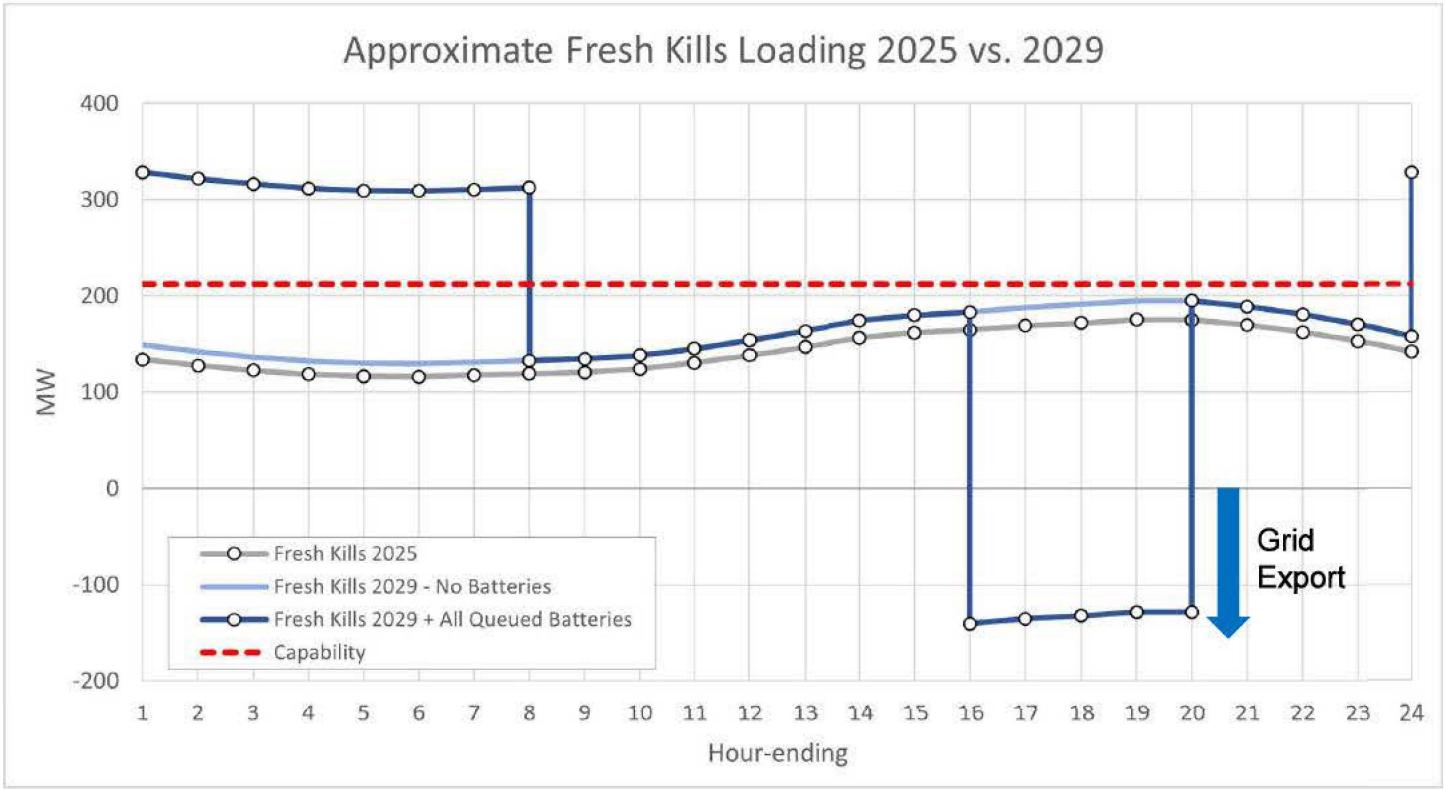
Constrained Area Loading Relative to Capability

Area	2025 % capability with storage	2029 % capability with storage
Fresh Kills	63%	170%
Glendale	56%	120%
Brownsville 1&2	87%	106%
Newtown-Glendale-Amtrak	68%	105%
Washington Street	68%	101%
Ossining West	61%	100%
Brownsville No. 2	64%	96%
Mott Haven	72%	95%
Woodrow	64%	92%
Millwood West	55%	89%

Area Station and Sub-Transmission Constraints

Fresh Kills Constraints

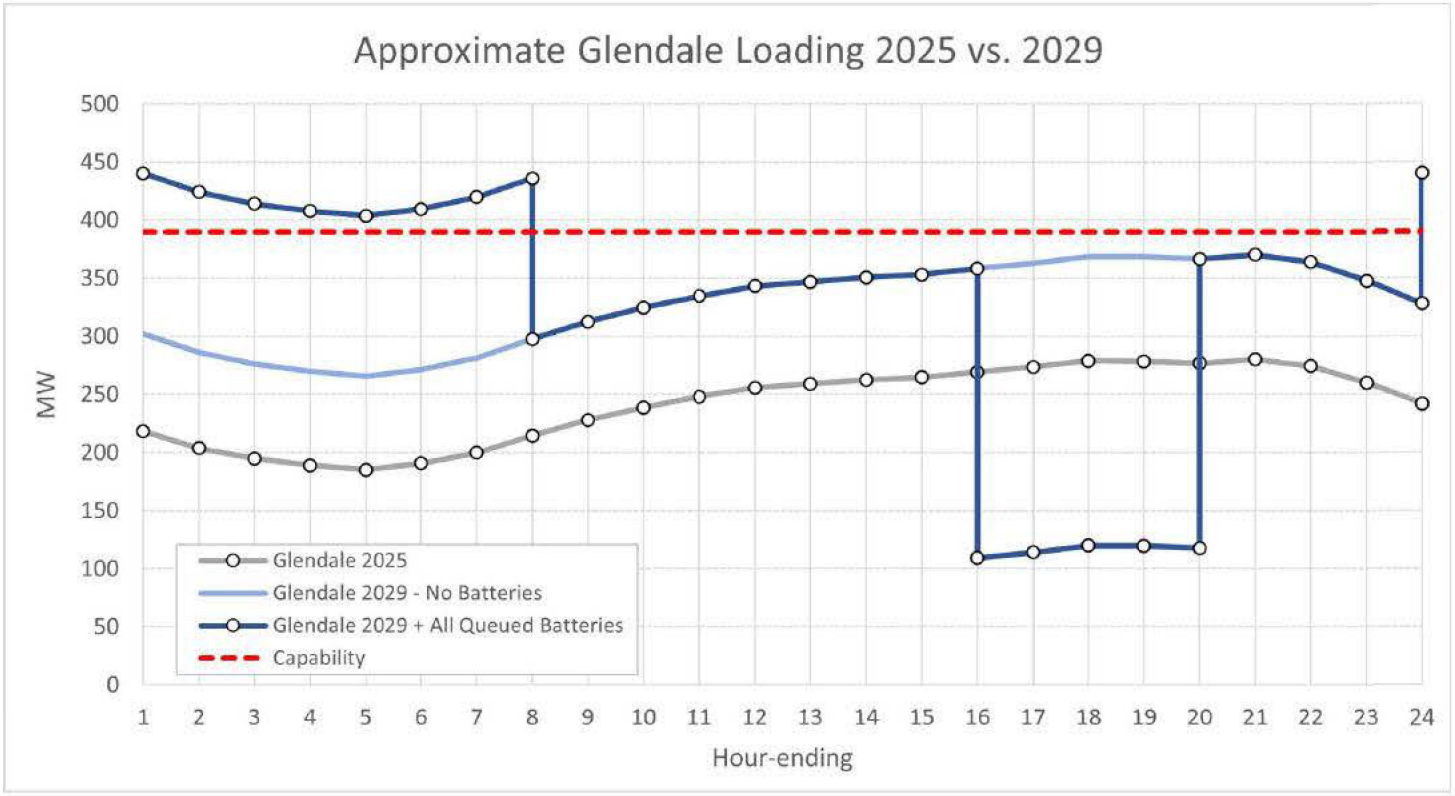
Constraint at Area Station Level



1. Grey curve shows 2025 hourly representative load shape scaled to actual 2025 peak. Light blue curve shows 2025 hourly representative load shape scaled to 2029 forecasted peak
2. 'All Queued Batteries' shown as of August 21, 2025

Glendale Constraints

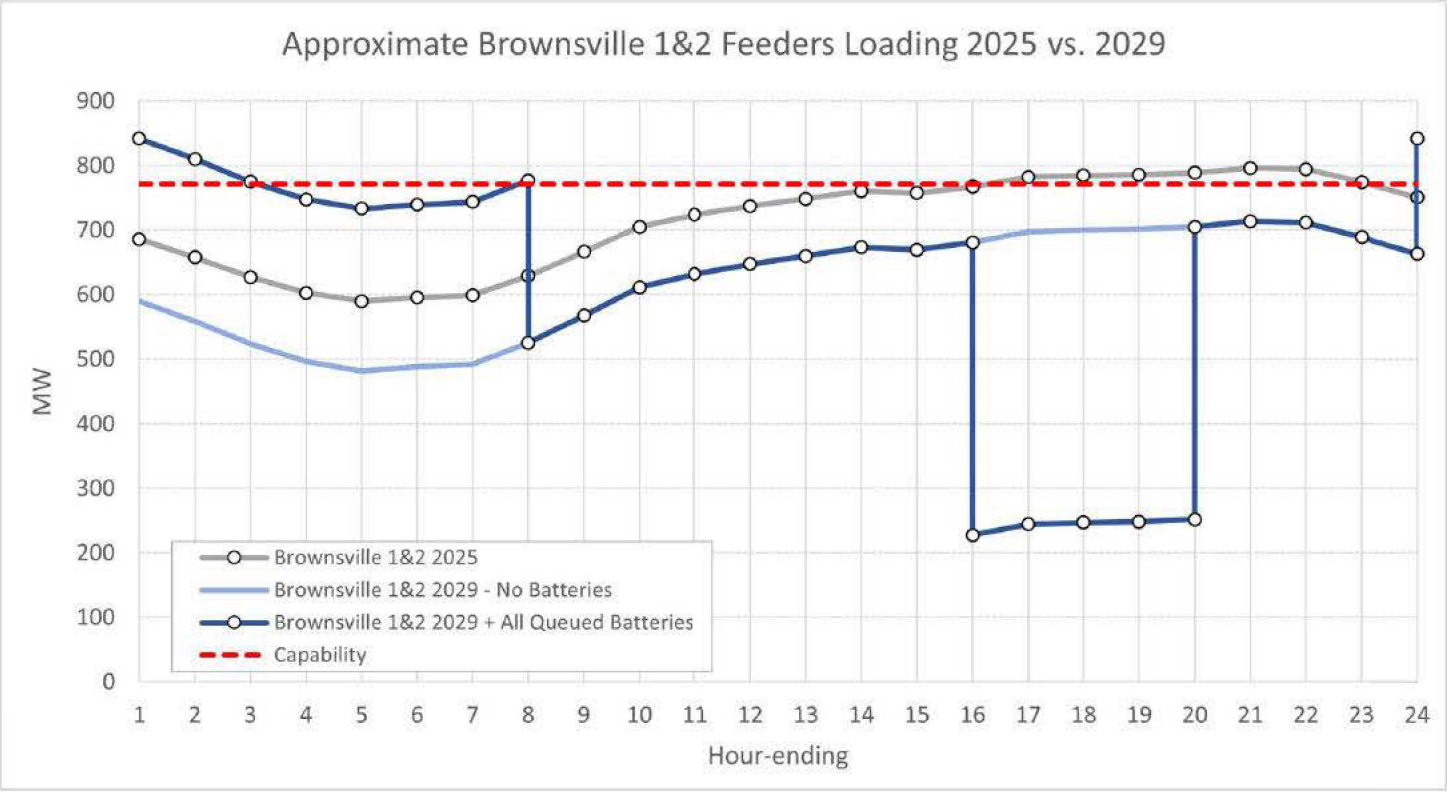
Constraint at Area Station Level



1. Grey curve shows 2025 hourly representative load shape scaled to actual 2025 peak. Light blue curve shows 2025 hourly representative load shape scaled to 2029 forecasted peak
2. 'All Queued Batteries' shown as of August 21, 2025

Brownsville 1&2 Constraints

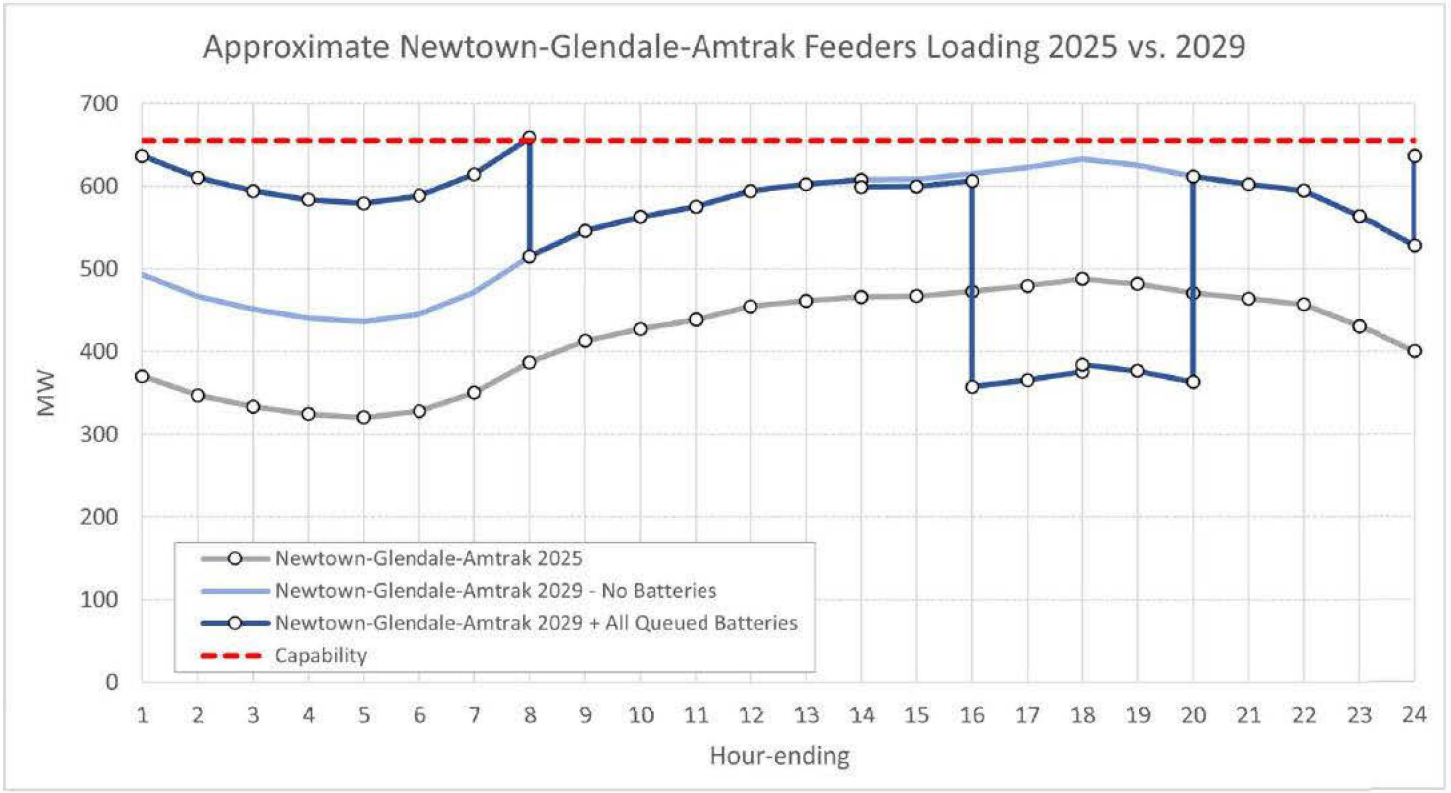
Constraint at Sub-Transmission Level



1. Grey curve shows 2025 hourly representative load shape scaled to actual 2025 peak. Light blue curve shows 2025 hourly representative load shape scaled to 2029 forecasted peak
2. 'All Queued Batteries' shown as of August 21, 2025

Newtown-Glendale-Amtrak Constraints

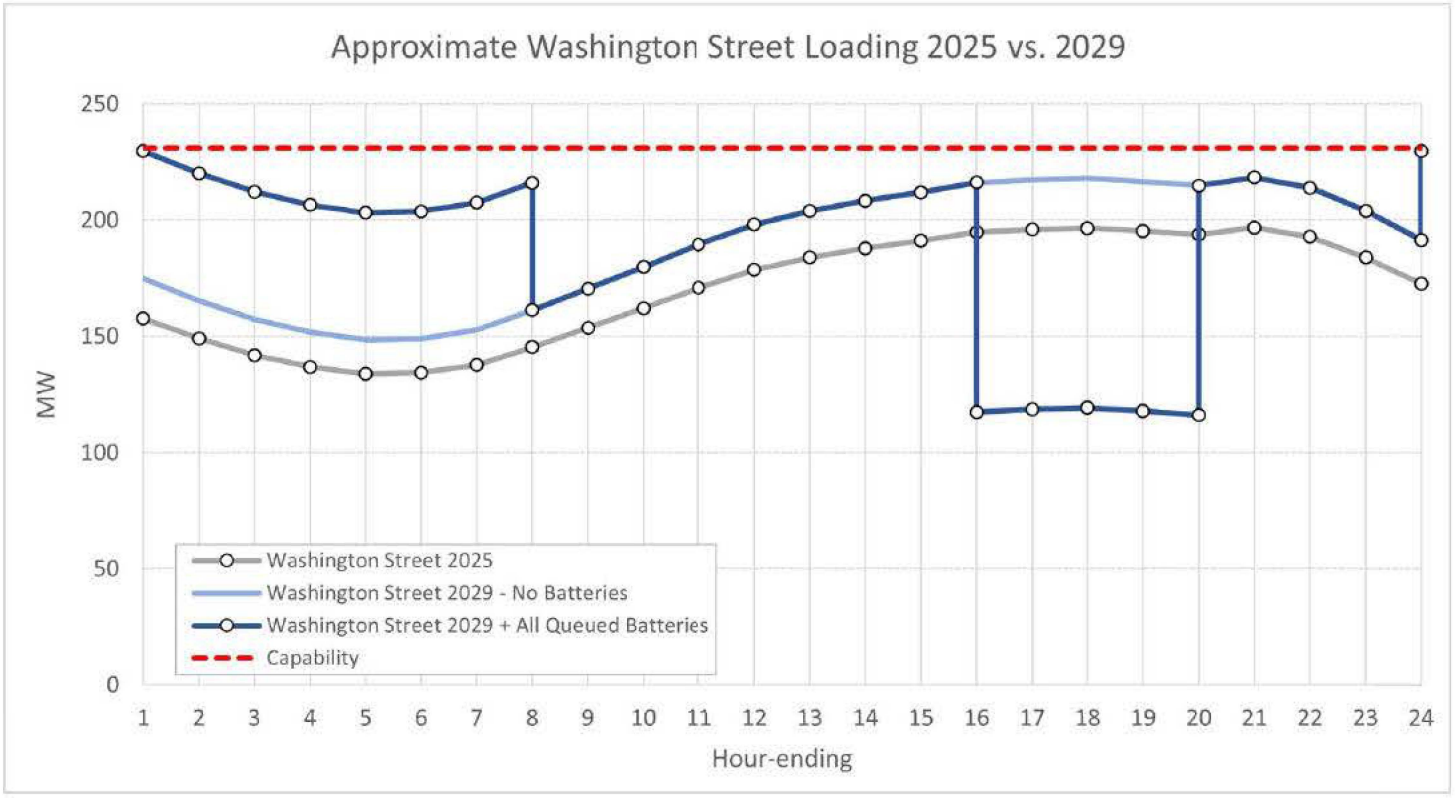
Constraint at Sub-Transmission Level



1. Grey curve shows 2025 hourly representative load shape scaled to actual 2025 peak. Light blue curve shows 2025 hourly representative load shape scaled to 2029 forecasted peak
2. 'All Queued Batteries' shown as of August 21, 2025

Washington Street Constraints

Constraint at Area Station Level



1. Grey curve shows 2025 hourly representative load shape scaled to actual 2025 peak. Light blue curve shows 2025 hourly representative load shape scaled to 2029 forecasted peak
2. 'All Queued Batteries' shown as of August 21, 2025

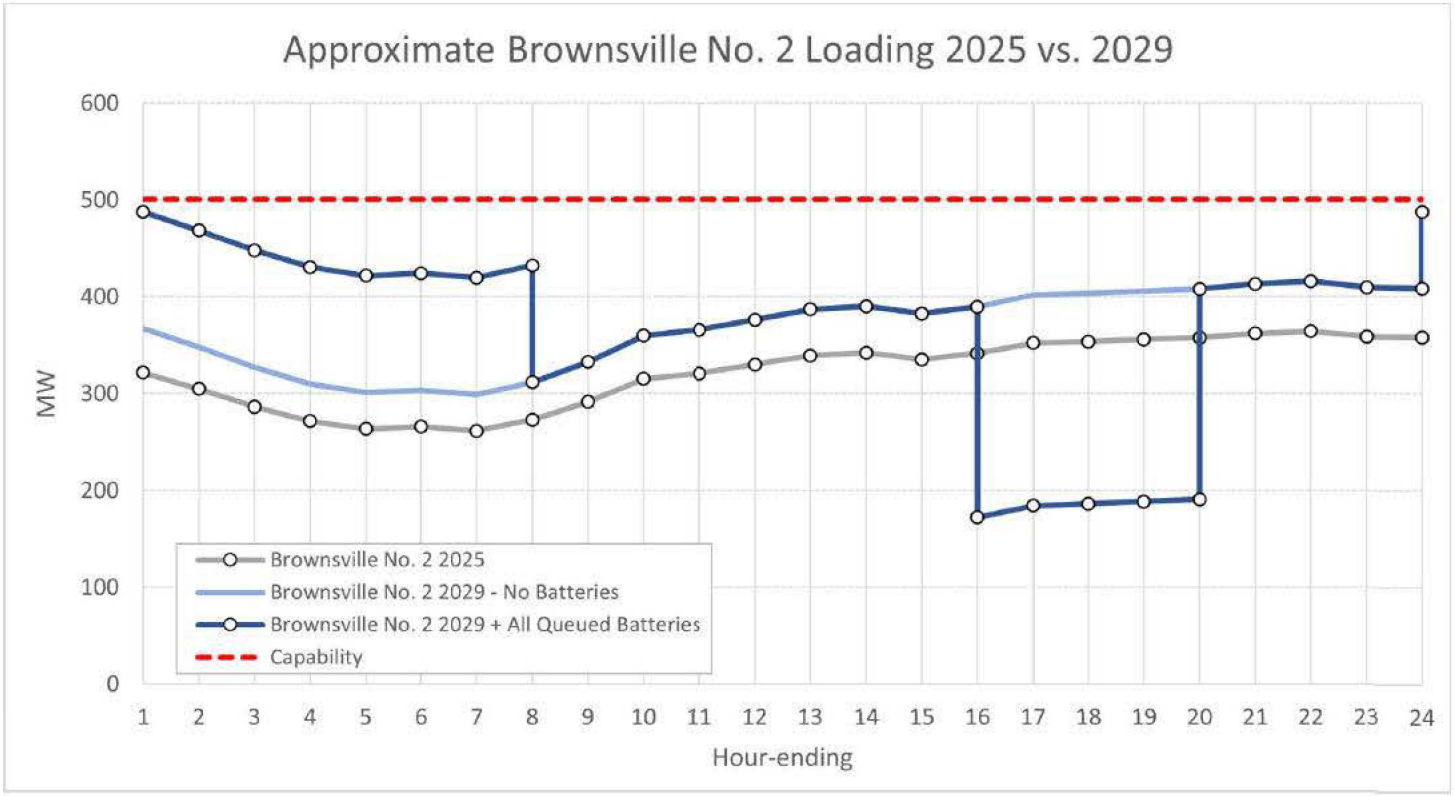
Ossining West Constraints

Constraint at Area Station Level

1. Grey curve shows 2025 hourly representative load shape scaled to actual 2025 peak. Light blue curve shows 2025 hourly representative load shape scaled to 2029 forecasted peak
2. 'All Queued Batteries' shown as of August 21, 2025

Brownsville No. 2 Constraints

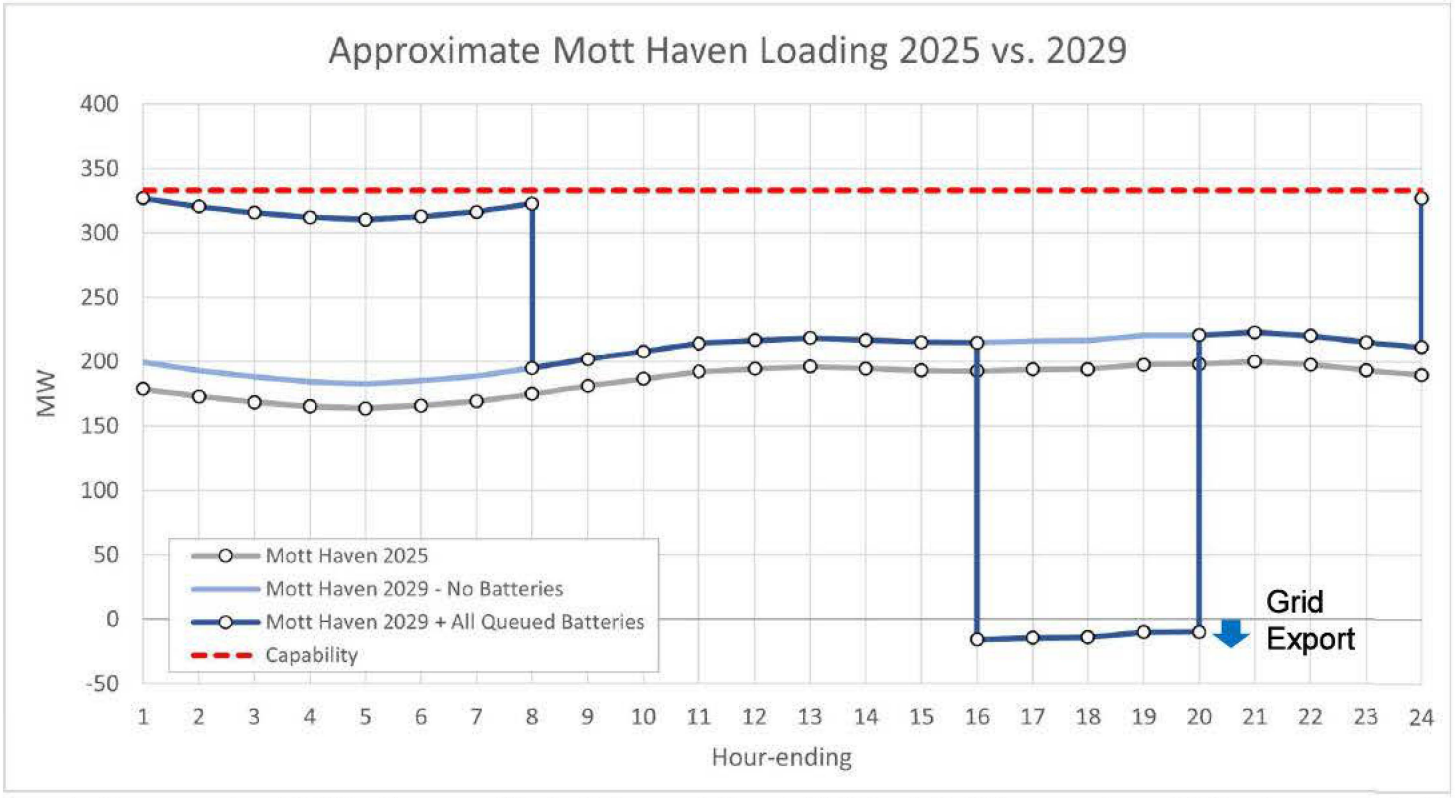
Constraint at Area Station Level



1. Grey curve shows 2025 hourly representative load shape scaled to actual 2025 peak. Light blue curve shows 2025 hourly representative load shape scaled to 2029 forecasted peak
2. 'All Queued Batteries' shown as of August 21, 2025

Mott Haven Constraints

Constraint at Area Station Level[3]



1. Grey curve shows 2025 hourly representative load shape scaled to actual 2025 peak. Light blue curve shows 2025 hourly representative load shape scaled to 2029 forecasted peak
2. 'All Queued Batteries' shown as of August 21, 2025
3. Includes planned 5th transformer installation.

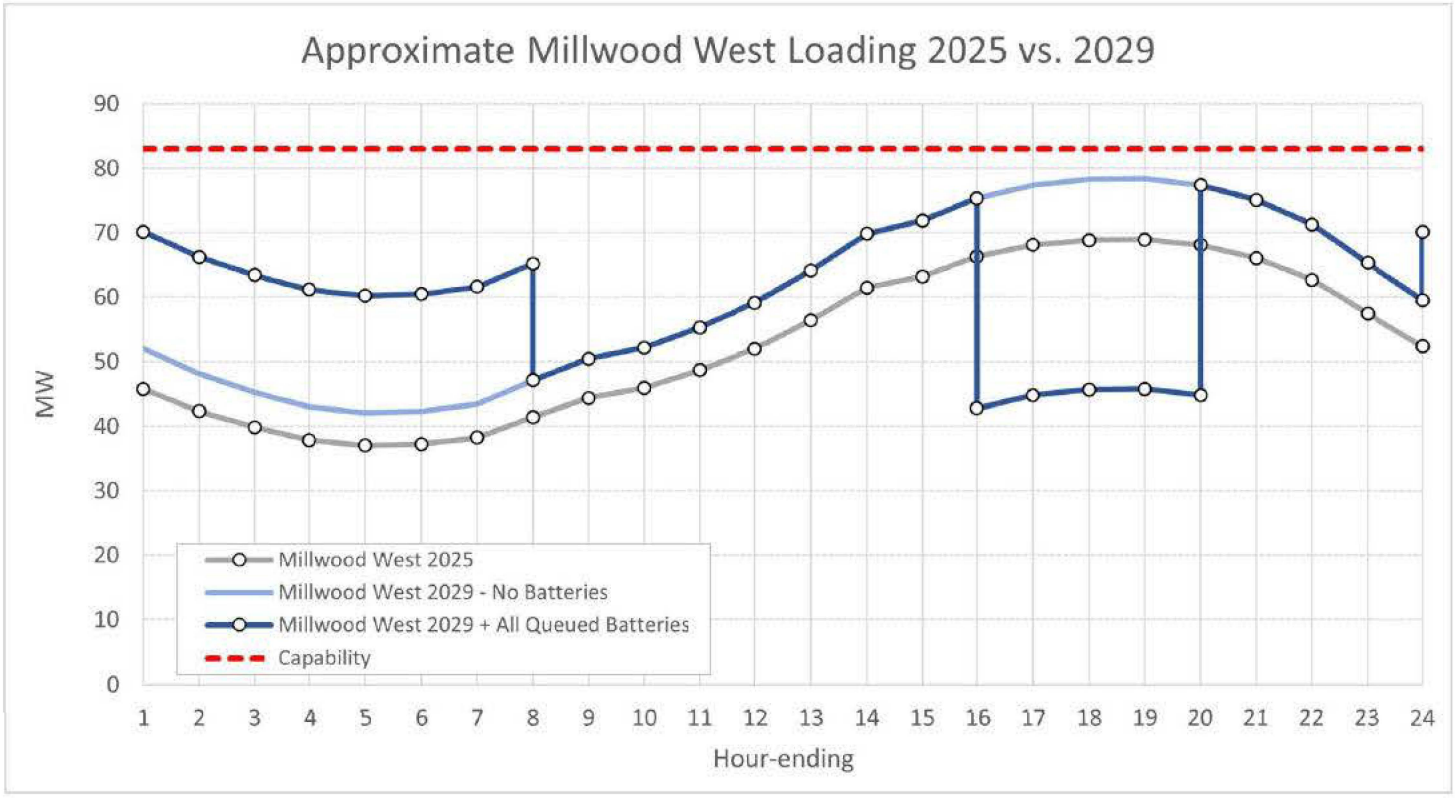
Woodrow Constraints

Constraint at Area Station Level

1. Grey curve shows 2025 hourly representative load shape scaled to actual 2025 peak. Light blue curve shows 2025 hourly representative load shape scaled to 2029 forecasted peak
2. 'All Queued Batteries' shown as of August 21, 2025

Millwood West Constraints

Constraint at Area Station Level



1. Grey curve shows 2025 hourly representative load shape scaled to actual 2025 peak. Light blue curve shows 2025 hourly representative load shape scaled to 2029 forecasted peak
2. 'All Queued Batteries' shown as of August 21, 2025

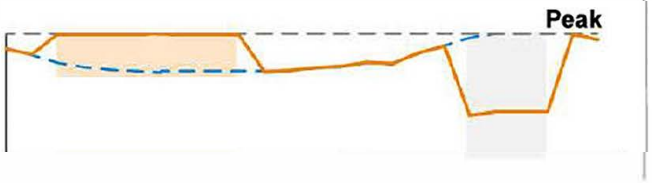
CESIR methodology assesses project impact on the grid today in line with SIR and Company reliability standards

We progressively apply three conditions to determine if project can connect without driving upstream grid needs

1 Project charging load stays under **2025 network peak** and sub-transmission load.

Result: Does not drive upstream infrastructure needs to be designed and built starting today.

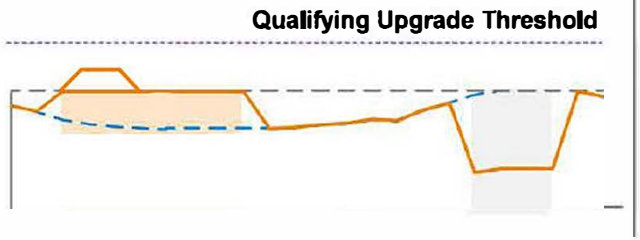
No qualifying upgrade



2 Project charging load exceeds **2025 peak** load AND is less than qualifying upgrade threshold

Result: Does not drive upstream infrastructure needs to be designed and built starting today

No qualifying upgrade



2 Project charging load exceeds **2025 peak** load AND is greater than qualifying upgrade threshold

Result: Does drive upstream infrastructure needs to be designed and built starting today

1. Orange line shows net substation load with battery charging and discharging
2. Blue dashed line shows substation load without battery charging and discharging
3. Grey dashed line is the reference daytime peak

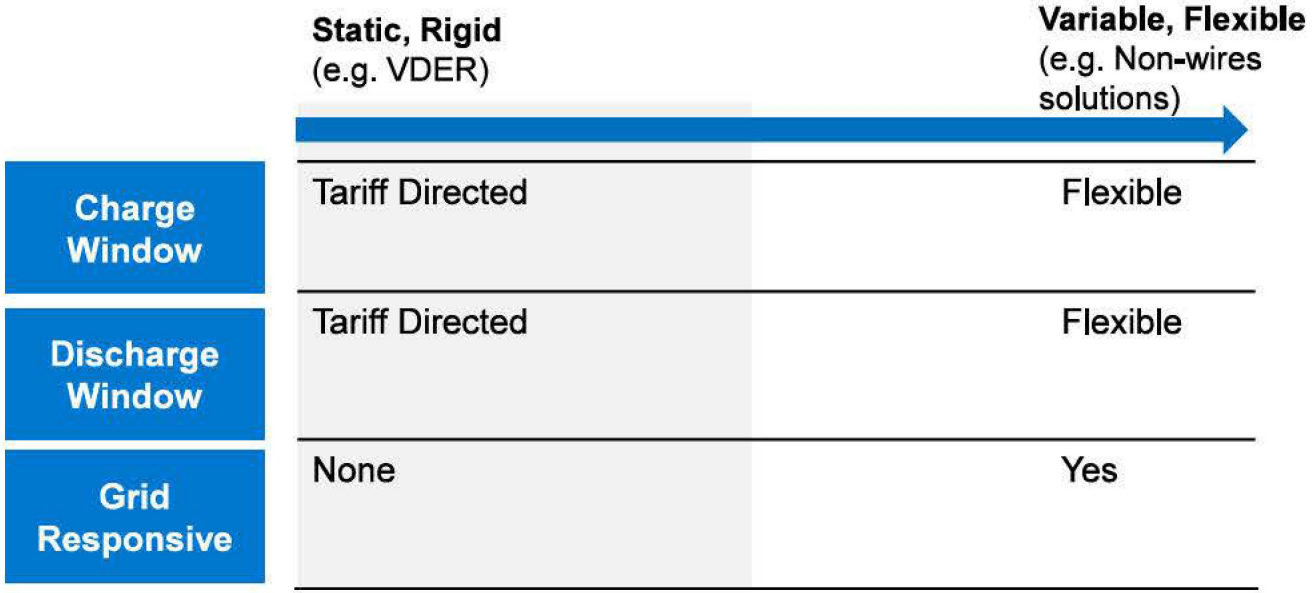
We have developed estimates of additional energy storage upstream hosting capacity[1] available at each area station

>100MW	Bensonhurst 1&2	North Queens
	Eastview-Elmsford	
50MW-100MW	Bensonhurst No. 1	Leonard Street No. 2
	Bensonhurst No. 2	Murray Hill
	Brownsville No. 2	Plymouth Street
	Corona No. 1	Rockview
	East 40th Street No. 2	Seaport No. 1
	East 63rd Street No. 2	Seaport No. 2
	Elmsford No. 2	Water Street
	Greenwood	West 42nd Street No. 1
	Harrison	
25MW-50MW	Astor	Jamaica
	Avenue A	Leonard Street No. 1
	Bruckner	Newtown-Glendale-Amtrak
	Buchanan	Pleasantville
	Cedar Street	Sherman Creek
	Corona No. 2	Trade Center No. 1
	East 40th Street No. 1	Washington Street
	East 63rd Street No. 1	West 110th Street No. 1
	East 75th Street	West 110th Street No. 2
	Fox Hills	West 19th Street
	Granite Hill	West 42nd Street No. 2
	Grasslands	West 50th Street
	Hellgate	White Plains
0MW-25MW	Brownsville 1&2	Newtown
	Brownsville No. 1	Ossining West
	Cherry Street	Parkchester No. 1
	Co-Op City	Parkchester No. 2
	East 179th Street	Parkview
	East 29th Street	Wainwright
	East 36th Street	West 65th Street No. 1
	Fresh Kills	West 65th Street No. 2
	Glendale	Willowbrook
	Millwood West	Woodrow
	Mott Haven	

1. Additional hosting capacity based on contracted projects as of 11/1/2025

Storage impacts on the grid can be complex, and can paradoxically lead to storage needs and constraints in the same area

We have identified non-wires solution opportunities[1] for contractually dispatched storage to meet network needs and defer investments in emerging areas where storage may reach saturation



1. For example: Avenue A RFP requests solutions, including storage, to support 10 MW across 8 hours by 2033

Q&A

Notice to Distributed Energy Resource (DER) Developers:

BESS Interconnection Constraints

August 15, 2025

Dear DER Developer,

We are writing to inform you of important updates regarding interconnections for battery energy storage systems in portions of our service territory. Most importantly, we wanted to notify you promptly about the potential for interconnection changes or delays.

Recent assessments indicate that the rapid growth of interconnection requests at the Brownsville, Washington Street, Fresh Kills, Glendale, Millwood West, Ossining West, and Woodrow Substations has led to capacity constraints. We are actively evaluating the full impact of these constraints and will provide periodic updates and individualized communications as more information becomes available. Notably, we may identify additional areas with constrained capacity during our analysis.

WHAT THIS MEANS AND NEXT STEPS:

- Any existing project that is located in an impacted area and does not yet have a fully executed Interconnection Agreement is on hold effective immediately. Likewise, any new project that enters the interconnection queue in an impacted area will immediately be placed on hold.
- No new Interconnection Agreements will be issued for projects in impacted areas until further evaluation is completed and any Interconnection Agreement that is countersigned after the issuance of this notice is invalid.
- If your project has a fully executed Interconnection Agreement, we will contact you directly to discuss any potential impacts.

For questions, please reach out to our Distributed Generation team at **dgexpert@coned.com**. We are available to discuss your project specifics and timelines.

Thank you for your continued partnership.

Consolidated Edison Company of New York, Inc.
4 Irving Place
New York, NY 10003

From: dgexpert
Subject: Notice of Emerging BESS Areas
Date: Tuesday, September 16, 2025 3:18:51 PM
Importance: High

Good afternoon,

As a follow-up to our August 15, 2025 letter informing you of areas where the Company's distribution system is experiencing capacity constraints for interconnecting battery energy storage systems (BESS), we are reaching out today to share that our continued analysis indicates additional areas may experience similar constraints in the future. These areas include the following substations: Mott Haven, Fox Hills, Bruckner, Parkchester No. 2, Wainwright, Corona No. 1, East 179th St., Bensonhurst 1 & 2, Corona No. 2, Greenwood, East 75th Street, Jamaica, Granite Hill, Water Street, Hellgate, Avenue A, Willowbrook, West 19th Street, Grasslands, and West 110th Street No. 2.

We will be reviewing upstream BESS application impacts in these areas on an ongoing basis and, accordingly, you will be receiving notices from PowerClerk during the CESIR process. To promote transparency, these areas will be marked on the hosting capacity maps to contrast with the areas that are already constrained, which are marked red.

Please reach out to dgexpert@coned.com with any questions.

[redacted]

From: [redacted]
Sent:
To:
Subject: FW: <External Sender> Updated Estimated Battery Energy Storage Hosting Capacity Table
Attachments: Estimated Available Capacity by Area Substation 11012025.pdf

From: Con Edison <DoNotReply@PowerClerk.com>
Sent: Friday, November 21, 2025 9:50 AM
To: [redacted]
Subject: <External Sender> Updated Estimated Battery Energy Storage Hosting Capacity Table

Dear Applicant,

Con Edison continues to accept applications for new battery energy storage projects in all areas of our service territory. While hosting capacity may be limited in certain areas in the short term, we have completed an updated assessment of estimated hosting capacity for battery energy storage at our area stations. The table attached summarizes these estimates based on contracted projects as of November 1, 2025.

Please note, hosting capacity estimates are subject to change based on system conditions. These values are provided for informational purposes only and do not guarantee future availability.

Please contact dgexpert@coned.com with any questions.

Thanks,

The PowerClerk Team

dgexpert@coned.com

Estimated Available Capacity by Area Substation (as of 11/1/2025)

>100 MW	North Queens	
50MW-100MW	Bensonhurst No. 1	Leonard Street No. 2
	Bensonhurst No. 2	Murray Hill
	Corona No. 1	Plymouth Street
	East 40th Street No. 2	Rockview
	East 63rd Street No. 2	Seaport No. 1
	Elmsford No. 2	Seaport No. 2
	Greenwood	Water Street
	Harrison	West 42nd Street No. 1
25MW-50MW	Astor	Jamaica
	Avenue A	Leonard Street No. 1
	Bruckner	Pleasantville
	Buchanan	Sherman Creek
	Cedar Street	Trade Center No. 1
	Corona No. 2	Washington Street
	East 40th Street No. 1	West 110th Street No. 1
	East 63rd Street No. 1	West 110th Street No. 2
	East 75th Street	West 19th Street
	Fox Hills	West 42nd Street No. 2
	Granite Hill	West 50th Street
	Grasslands	White Plains
	Hellgate	
0MW-25MW	Brownsville No. 1	Newtown
	Brownsville No. 2	Ossining West
	Cherry Street	Parkchester No. 1
	East 179th Street	Parkchester No. 2
	East 29th Street	Parkview
	East 36th Street	Wainwright
	Fresh Kills	West 65th Street No. 1
	Glendale	West 65th Street No. 2
	Millwood West	Willowbrook
	Mott Haven	Woodrow

**Available capacity may be determined by the constraints of the substation or, in some cases, the upstream constraints on the sub-transmission system.*

Appendix 2

CESIR Methodology: Illustrative Examples of Upstream Capacity Testing Conditions

The following are illustrative examples of the two-step conditional test described in Section II.B. of this Notice. These illustrations are not representative of any project and do not encompass the full scope of analysis, upgrades that may be required because of issues other than BESS charging load, and case by case issues associated with any interconnection application. These illustrative examples are specific to whether area station upgrades would be required, and do not examine other downstream upgrades, sub transmission upgrades, or the specific measures or costs that might be associated with the example upgrades.

Three BESS projects, in queue order, Project A, Project B, and Project C, each with a 5MW/20MWh capacity and a 90% round trip efficiency, have applied to interconnect at Area Station 1.

A fourth BESS project, Project D, also with a 5MW/20MWh capacity and a 90% round trip efficiency, has applied to interconnect at Area Station 2.

- All four BESS projects have the same charge window from 12AM-8AM and will consistently draw at 2.78MW.
- All BESS have the same discharge window from 4PM-8PM and will consistently inject at 5MW.

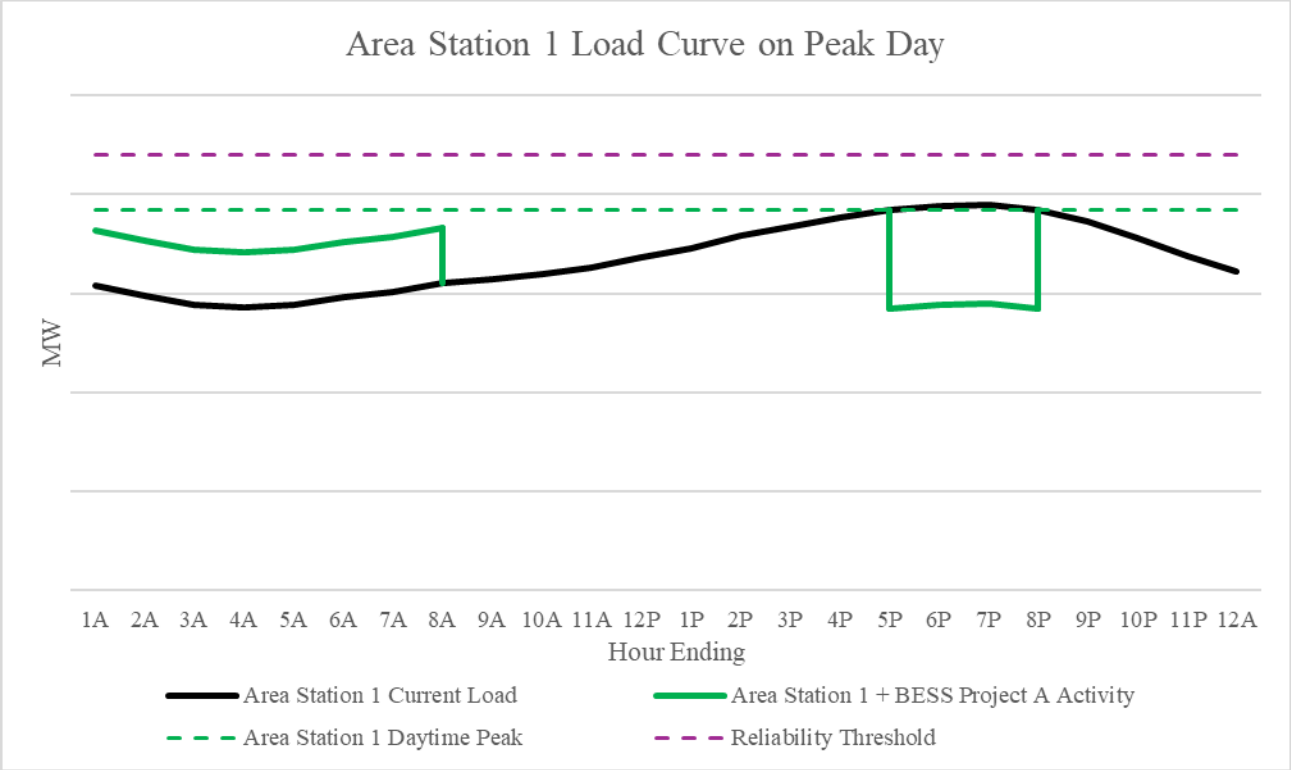
Illustrative Project	Test 1	Test 2	Area station upgrade required to support BESS charging load?
A	Pass	*Pass	No
B	Fail	Pass	No
C	Fail	Fail	Yes
D	Pass	*Fail	No

*In these instances, in practice, evaluation under Test 2 would not be required once the BESS project passed Test 1.

Example 1 (Area Station 1 / Project A): No upgrades required.

TEST 1: Pass. The charging activity from BESS Project A does not create a peak at Area Station 1, thus passing test 1 and not triggering required upgrades. **There is sufficient Hosting Capacity and upgrades are not required for the BESS charging load**.

TEST 2: Pass. Further analysis under test 2 is not required, though in this example the charging activity from Project A also does not exceed the reliability capacity threshold.

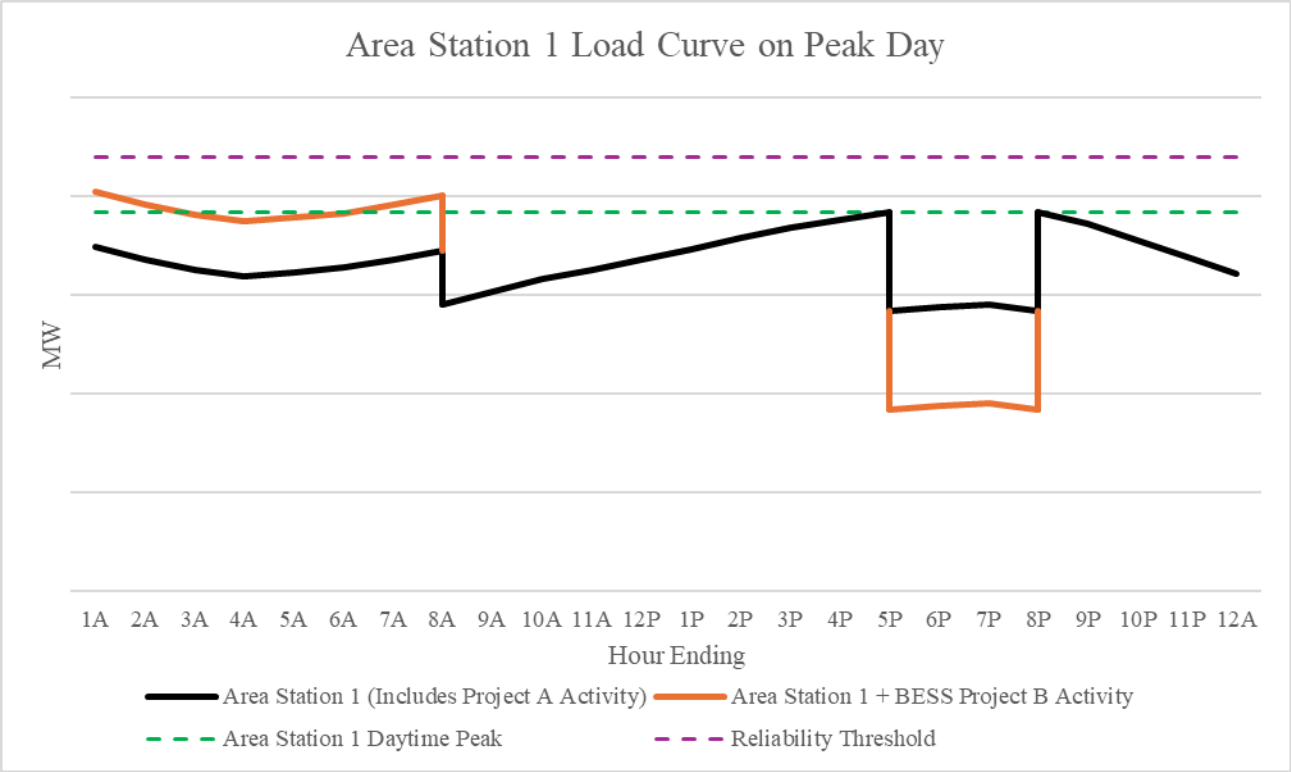


Example 2 (Area Station 1 / Project B): No upgrades required.

After Project A has been studied, Project B applies to interconnect at the same area station.

TEST 1: Fail. Since the charging activity from Project B creates a peak at Area Station 1, it fails test 1.

TEST 2: Pass. The charging activity from Project B does not exceed the reliability capacity threshold, and thus this project passes test 2. Although this project failed test 1, **there is sufficient Hosting Capacity and upgrades are not required for the BESS charging load**.

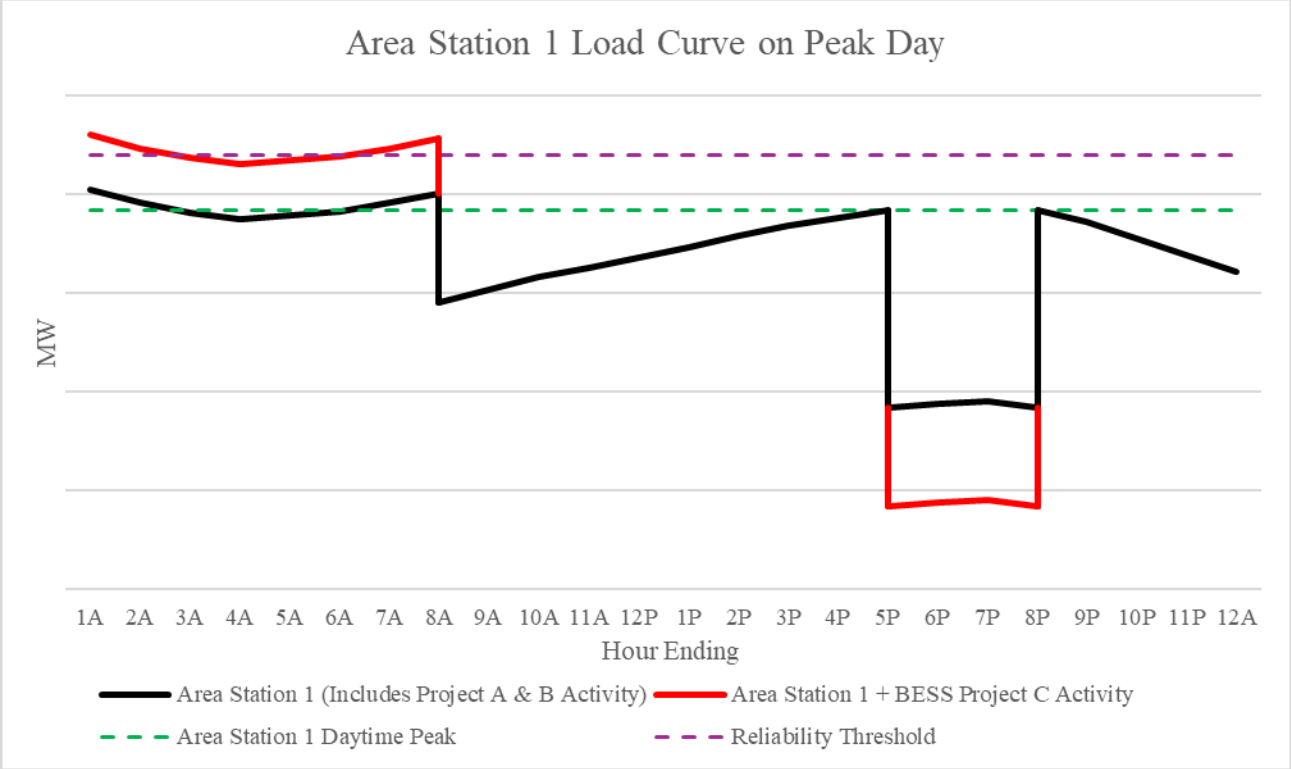


<u>Example 3 (Area Station 1 / Project C): Upgrades required.</u>

After both Project A and Project B have been studied, Project C applies to interconnect at the same area station.

TEST 1: Fail. Since the charging activity from Project C at Area Station 1 creates a peak, it fails test 1.

TEST 2: Fail. The charging activity from Project C **also** exceeds the reliability threshold, and thus this project fails test 2. As a result of failing both tests, **there is not sufficient Hosting Capacity and upgrades are required for the BESS charging load**.



Example 4 (Area Station 2/Project D): No upgrades required.

Separately, at Area Station 2, which has a different load profile and reliability capacity threshold than Area Station 1, Project D applies to interconnect.

TEST 1: Pass. The charging activity from BESS Project D does not create a peak at Area Station 2, thus passing test 1 and not triggering required upgrades.

TEST 2: Fail. Further analysis under test 2 is not required, however the charging activity from Project D exceeds the reliability threshold, and thus this project would fail test 2. Because this project passed Test 1, **there is sufficient Hosting Capacity and upgrades are not required**. This outcome reflects that exceeding the reliability threshold alone does not trigger upstream upgrades, unless the project also creates a peak under test 1