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**VIA ELECTRONIC FILING**

TO: Hon. Michelle L. Phillips, Secretary to the Commission  
Hon. Rory M. Christian, Commission Chair and CEO  
New York State Public Service Commission  
3 Empire State Plaza, 19th Floor  
Albany, New York 12223-1350

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

**Urgent Action Needed on Energy Storage Interconnections to Address New York City Reliability Needs**

Dear Chair Christian and Secretary Phillips,

NY-BEST applauds the Commission's leadership in recently directing Con Edison to develop a reliability contingency plan for New York City, including evaluating and proposing non-emitting solutions like demand response and energy storage to meet reliability needs. We look forward to engaging in this new proceeding to support downstate reliability planning.

As you know, both NYISO and Con Edison have identified significant reliability shortfalls beginning as early as 2026, with deficiencies projected to grow substantially through 2035. **Energy storage can play a critical role in addressing these needs**—but only if interconnection processes allow deployment to proceed, if outdated market rules are reformed to harness energy storage's true potential, and if grid planning processes appropriately recognize the scale and capabilities of energy storage.

**At a time when New York City needs grid capacity and reliability resources more than ever,** Con Edison has effectively frozen new distributed storage interconnections without seeking Commission approval or engaging stakeholders in a transparent process. While NY-BEST recognizes the complexity of managing grid operations in a rapidly evolving energy landscape, Con Edison's approach not only creates deep uncertainty for the energy storage industry, but also limits much-needed reliability capacity and increases costs to ratepayers by restricting cost-effective energy storage alternatives to traditional infrastructure. **Instead of limiting interconnections, the Commission should initiate a process to work with utilities and stakeholders to reform interconnection, market rules, and grid planning, maximizing our collective ability to harness cost-effective reliability solutions like energy storage for New York ratepayers.**

We enclose two documents for the Commission's consideration:

1. *Call for Immediate Relief: Con Edison Must Lift Newly-Imposed Restrictions on Energy Storage Interconnections.* This document outlines Con Edison's inappropriate decision in August 2025 to limit energy storage interconnections today in anticipation of potential future constraints, and how the Commission can take immediate action to redress this.
2. *NY-BEST Whitepaper: Unlocking Distributed Energy Storage to Address Reliability Needs in New York City.* This document proposes critical reforms to our outdated interconnection and market rules to enable energy storage to provide maximal value to the grid, addressing reliability concerns while reducing costs for ratepayers.

**These documents outline immediate regulatory actions the Commission can take to support reliability in New York City with cost-effective distribution-connected energy storage deployment.** NY-BEST anticipates filing additional comments shortly regarding opportunities for transmission-connected energy storage and behind-the-meter storage to also help fill the reliability gap.

Many thanks for your consideration of these critical matters. If you have any questions about these comments or need additional information, please contact us at 518-694-8474 or by email at [info@ny-best.org](mailto:info@ny-best.org). Thank you.

Sincerely,



Dr. William Acker  
Executive Director



Claudia Villar-Leeman  
Sr. Director, Policy and Regulatory Affairs