



175 Pearl St., 3rd Floor
Brooklyn NY 11201

July 1, 2022

Dear Climate Action Council Members:

We are writing to submit comments in relation to the NYS Climate Action Council Draft Scoping Plan for the Climate Leadership and Community Protection Act (CLCPA) released by the Climate Action Council on December 20, 2021.

Orenda, Inc. supports the Draft Scoping Plan as a general framework for implementing the CLCPA. We have additional recommendations for the CAC that are focused primarily on providing additional strategies to strengthen the role of energy storage in enabling the State's transition to a carbon free economy. We also urge the CAC to continue to emphasize creating strong markets and policies to attract private investors and companies seeking to grow the clean energy economy in New York.

Achieving the CLCPA requirements will require a transformation of the State's economy, including the building, transportation and electricity sectors and energy storage is an essential technology to achieve this transformation.

Orenda, Inc. urges the CAC to act with urgency with respect to adopting the Draft Scoping Plan recommendations, particularly in relation to energy storage on the grid and in transportation. Over the past 12-months, we have seen the cost of energy storage systems double on an installed cost basis. This, combined with the expiration of state incentive programs, is threatening the viability of our portfolio, slowing the clean energy transition.

The energy storage industry is currently at a near standstill in New York and this effectively means that so is State action on climate change, especially given the vital role of energy storage to enable the transition. Energy storage must be deployed in the near term to:

- Solve the intermittency problem in the bulk wholesale electric grid and market, and
- Solve the electrification hosting capacity problem in the retail distribution electric grid

To address this situation and solve these challenges, the State must act in 2022 to ensure that a new Energy Storage Roadmap and Order – along with new sustaining programs and market mechanisms to compensate energy storage for its system benefits-- are adopted to put New York on the path to achieving Governor Hochul's stated directive of at least 6 GW of energy storage by 2030.

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Specific Recommendations

Orenda, Inc. supports the recommendations of the Draft Scoping Plan and its recognition of energy storage as an essential technology for achieving the CLCPA goals and mandates. That said, we do have additional recommendations to strengthen the Plan. In summary, Orenda, Inc. recommends the State ensure the following strategies are included in the final plan:

- Continued development of strong markets and policies that encourage and leverage private investment in the State's green economy and clean energy project deployment in the State.
- Timely adoption of a new Energy Storage Roadmap for achieving at least 6 GW of energy storage on the state's electric grid by 2030, including new programs and sustaining funding mechanisms to create long-term market certainty to attract investment for bulk and distributed energy storage deployment; programs to facilitate displacement of fossil-fueled generation with energy storage; and legislation to enact a sales tax exemption for energy storage.
- Investment in transmission and distribution system upgrades to support new renewable energy resources, along with new pathways for energy storage to function and be compensated as a transmission and distribution system asset.
- Support for the utilities in improving the interconnection process, both focused on new design standards and more accurate modeling of project characteristics.
- Focus on long-duration energy storage through creation of a Long Duration Storage Center of Excellence and large-scale storage demonstration projects.
- Accelerating programs and market-based mechanisms to reduce emissions in the transportation sector, including efforts to increase EV adoption, transition medium and heavy-duty vehicles to electric and programs that emphasize the benefits of V2G
- Support of a Just Transition and workforce development initiatives that focus on growing and attracting green energy industries, such as energy storage, where the State has an opportunity – through strategic investment- to position itself as a global industry leader and create good-paying lasting jobs.
- Continuing initiatives with local governments to support outreach and education as well as, technical and financial assistance, and streamlining siting and permitting for clean energy projects, including energy storage.



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Action is needed today to unleash the benefits of energy storage and enable the transformation required by the Climate Act. Orenda, Inc. also support the comments and recommendation submitted to the CAC under separate cover. We appreciate your consideration of our recommendations.

Sincerely,

Aidan Snyder
Co Founder & Chief Development Officer
Orenda, Inc.

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