## September 7, 2021 UNITED STATES OF AMERICA BEFORE THE FEDERAL ENERGY REGULATORY COMMISSION

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New York Independent System Operator, Inc.	)	Docket No. ER21-2460-000
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## RESPONSE OF ALLIANCE FOR CLEAN ENERGY, NEW YORK

The Alliance for Clean Energy, New York (ACE NY) respectfully submits this response to the protests submitted on the filing dated July 19, 2021, of the New York Independent System Operator, Inc. (NYISO) (Compliance Filing), which proposes tariff revisions to amend its participation model for distributed energy resources (DERs) as required by Order No. 2222 and subsequent related orders.<sup>1</sup>

The mission of ACE NY is to promote the use of clean, renewable electricity technologies and energy efficiency in New York State, in order to increase energy diversity and security, boost economic development, improve public health, and reduce air pollution. ACE NY members are a mix of private companies and non-profit organizations interested in promoting clean energy and creating opportunities for growth in New York's clean energy economy. They include renewable developers, storge providers and Energy Efficiency (EE) companies.

ACE NY generally supports the 'protest filing' made by Sustainable FERC Project, Natural Resources Defense Council, Advanced Energy Economy, and the City of New York ("Clean Energy and Consumer Advocates") requesting the FERC to order NYISO to develop a 'participation model' for EE resources to participate in the NYISO wholesale capacity markets.

ACE NY believes that EE is a cornerstone in the fulfillment of the NY State Climate Leadership and Community Protection Act (CLCPA) passed in 2019. Among other things, the CLCPA requires 22 million tons of carbon reduction through EE and electrification and that New Yorkers reduce their energy use in buildings by 185 trillion Btus by 2025. Buildings are the second largest source of greenhouse gas emissions in the state, contributing to one-third of our

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<sup>&</sup>lt;sup>1</sup> Participation of Distributed Energy Resource Aggregations in Markets Operated by Regional Transmission Organizations and Independent System Operators, Order No. 2222, 172 FERC 61,247 (Sep. 17, 2020), 85 Fed. Reg. 70,143 (Nov. 4, 2020); Order No. 2222-A, 174 FERC ¶ 61,197 (Mar. 18, 2021); Order No. 2222-B, 175 FERC ¶ 61,227 (Jun. 17, 2021).

total greenhouse gas emissions. Accordingly, the NYISO is counting on a peak load reduction of 8,229 MW and 47,768 GWH from EE and Codes and Standards, by 2040 in its load forecast. Accomplishment of a such massive level of EE would require significant ramp up of current and new EE programs and the use of all tools in the toolbox. While New York utilities and NYSERDA have spearheaded the EE efforts in the State for decades, it is unclear if their efforts would suffice to accomplish the very aggressive EE goals. The NYISO market mechanisms would be another tool to deploy to attract more EE providers to NY market to facilitate accomplishment of EE goals in the CLCPA. We recognize that neighboring RTOs PJM and ISONE already allow EE to participate in the supply side of their markets and they have worked through numerous issues to facilitate EE participation. The NYISO through its stakeholder process should also explore an EE participation model to allow EE providers to offer EE on the supply side. ACE NY stands ready to assist in the stakeholder collaboration process.

We respectfully urge the FERC to support the 'protest filing' made by the Clean Energy and Consumer Advocates and order the NYISO to develop a 'participation model' for EE resources to allow them to participate in the NYISO wholesale capacity markets.

Sincerely,

Anne Reynolds Executive Director Alliance for Clean Energy, New York