March 27, 2023

VIA ELECTRONIC MAIL

Hon. Michelle L. Phillips
Secretary
New York State Public Service Commission
3 Empire State Plaza
Albany, New York 12223-1350
secretary@dps.ny.gov

Re: Case 16-M-0411 – In the Matter of the Distributed System Implementation Plans

Dear Secretary Phillips:

Advanced Energy United and Alliance for Clean Energy New York submit for filing the attached comments in response to the Proposed Commission Guidance for the Electric Utilities' Distributed System Implementation Plan Update Filings filed with the New York State Public Service Commission on January 10, 2023, by the Department of Public Service, in the above referenced proceeding.

Respectfully submitted,

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Policy Principal, Advanced Energy United

Ryan Katofsky
Managing Director, Advanced Energy United

Deb Peck Kelleher
Deputy Director, Alliance for Clean Energy New York

Comments on the Proposed Commission Guidance for the Electric Utilities' Distributed System Implementation Plan ("DSIP") Update Filings

Introduction

In response to the Department of Public Service's ("DPS") Proposed Commission Guidance in the above-referenced proceeding concerning the Electric Utilities' Distributed System Implementation Plans ("DSIPs"), Advanced Energy United ("United") and Alliance for Clean Energy New York ("ACE NY") submit these comments. We thank the Public Service Commission ("PSC" or "Commission") and the DPS for the opportunity to provide input on this guidance. These DSIPs will play an increasingly important role in the grid management and planning efforts of the state as it seeks to achieve its ambitious climate goals. United (formerly known as Advanced Energy Economy) was actively involved in the development of the initial DSIP guidance and subsequent utility DSIP filings, and has continued to be a strong advocate for improved, integrated, more transparent utility planning processes.

Advanced Energy United, or "United", is a national association of businesses that are making the energy we use secure, clean, and affordable. We work to accelerate the move to 100% clean energy and electrified transportation in the U.S. Advanced energy encompasses a broad range of products and services that constitute the best available technologies for meeting our energy needs today and tomorrow. These include energy efficiency, demand response, energy storage, solar, wind, hydro, nuclear, electric vehicles, and the smart grid. We represent more than 100 companies in the $238 billion U.S. advanced energy industry.

ACE NY is a member-based organization with a mission of promoting the use of clean, renewable electricity technologies and energy efficiency in New York State to increase energy diversity and security, boost economic development, improve public health, and reduce air pollution. ACE NY's diverse membership includes companies engaged in the full range of clean energy technologies as well as consultants, academic and financial institutions, and not-for-profit organizations interested in their mission. United and ACE NY are referred to collectively in these comments as "we," or "our."

Generally speaking, we are supportive of the Proposed Guidance DPS Staff has provided regarding the DSIP Update filings. In particular, we appreciate Staff's efforts to more clearly define the relationship between DSIP and Coordinated Grid Planning Process ("CGPP") filings,[1] and we look forward to future iterations of these filings that specifically take into account

[1] Coordinated Grid Planning Process Proposal, files by the Joint Utilities on December 27, 2022, in case 20-E-0197, Proceeding On Motion Of The Commission To Implement Transmission Planning Pursuant To The Accelerated Renewable Energy Growth And Community Benefit Act.

complementary system needs and investment plans. Additionally, we are pleased that Staff has provided additional guidance concerning grid operations, the facilitation of distributed energy resource ("DER") service provision, and the larger role expected to be played by DERs in meeting system needs. Full realization of the benefits that DERs can provide is a key desired outcome of these planning processes, and we look forward to the implementation of related programs and transaction frameworks.

We are also appreciative of Staff's focus on providing stakeholders with relevant information, tools, and engagement opportunities, and finds the delineation of how stakeholders will engage with the DSIP process moving forward to be well-aligned with broader goals in the Accelerated Renewable Energy Growth and Community Benefits Act ("AREGBCA"). However, given the large volume of information that will be generated through the process, we suggest that Staff pay particular attention to how such information is organized and accessed, and the establishment of clear guidelines defining the scope and depth of stakeholder involvement in the DSIP development process and subsequent implementation. To this end, we ask that the Commission consider the benefits that an independent consultant might bring to its administration of this process. For instance, an independent consultant could aid Staff in its evaluation of findings and dissemination of information to relevant stakeholders.

DSIP and Coordinated Grid Planning Process Integration

As the state's utilities, relevant agencies, and stakeholders continue to develop the specifics of the CGPP, the establishment of well-defined boundaries between the CGPP and the DSIP process both in scope and in timing will be critical to the efficacy and pertinence of New York's grid planning efforts. We appreciate Staff's consideration of this dynamic and looks forward to future discussion of this topic in both the CGPP and DSIP processes. We note that the CGPP's proposed 3-year cycle differs from the DSIP's 2-year cycle, and encourage the Commission to identify specific points of interface and information exchange as both processes come into sharper focus. In the same vein, the Commission should weigh the benefits of changing the cadence of these processes to better facilitate coordination and integration.

Section 3: DSIP Update General Requirements

We are strongly supportive of Staff's recommendation that special attention be paid to "the purposeful development of stakeholder tools and information sources useful to DER providers in fostering productive DER development; collecting, managing, and sharing system and customer data; and advances toward an integrated planning environment."[2] We note here that the collection, management, and distribution of such information are all central features of the Integrated Energy Data Resource ("IEDR"), and highlight the importance of avoiding confusion

[2] Proposed Commission Guidance for Electric Utilities' DSIP Update Filings, P. 6

and unnecessary overlap between the IEDR and the Commission's efforts to follow this recommendation. Careful evaluation of potential cross-over here will ensure that stakeholders are not faced with undue difficulty in their efforts to access related information as the IEDR is implemented.

DSIP Update Topics

Section 4.2: Advanced Forecasting

Regarding advanced forecasting, we suggest that the utilities engage with DER providers to fully understand the capabilities of these technologies and services, which will in turn aid in the development of the forecasts Staff describes in the Proposed Guidance document with respect to load and supply. As stated previously, we note that some of the information requested by Staff will eventually be made available through the IEDR, warranting the Commission's assessment of processes that mitigate any confusion.

Section 4.3: Grid Operations

The evaluation of grid operations and the creation of conditions that will allow DERs to meet customer and system needs will both play vital roles in broader system reliability and resiliency, and we strongly support Staff's emphasis on these two points. The specific mention of data communications infrastructure, distributed sensors and control devices, power flow controllers, and solid-state transformers is highly encouraging, as policies and procedures that allow for or incentivize the utilization of such technologies can yield significant system operations and consumer benefits.

Section 4.4: Energy Storage Integration

In general, we agree that a greater emphasis on energy storage is appropriate within the DSIP process, especially in light of the state's 6GW storage goal. We do however have concerns that some of the data being requested – for instance, data that pertains to customer-sited and/or third-party-owned systems – may be of a proprietary or otherwise competitively sensitive nature. Item number 1 in this section ("the locations, types, capacities (power and energy), configurations (i.e., standalone or co-located with load and/or generation), and functions of existing energy storage resources in the distribution system") falls into this category.[3]

If it is Staff's intention that this information be collected solely for utility-owned systems then such disclosure may be appropriate, but if this broader storage information is meant to be share more publicly, we advise Staff to consult with third-party storage owners on their competitive concerns with the proposed requirements.

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[3] Proposed Commission Guidance for the Electric Utilities' DSIP Update Filings P. 14

Section 4.6: Clean Heat Integration

We are pleased that Staff is recommending the inclusion of Clean Heat integration plans in the DSIPs and we look forward to the consequent acceleration of this programming that is so critical to the state's achievement of its decarbonization goals. Echoing our concerns related to energy storage integration, however, if Staff is seeking customer-specific information as implied by item number 1 in this section, there should be clarification of the parameters defining the collection, management, and use of this data.[4]

Section 4.8: Data Sharing

Regarding the utilities' "existing and planned capabilities that enable timely and effective sharing of system and customer data with customers and authorized third-parties", it is not clear to us that the provision of the information requested on pages 22 and 23 of this section pertaining to the IEDR should be the responsibility of the utilities or NYSERDA. We request that Staff clarify this point in its final guidance document.

Section 4.9: Hosting Capacity

We support ongoing improvements to hosting capacity analysis and data availability, and we appreciate Staff's recognition of the fact that hosting capacity will not remain static as the DER market continues to evolve and becomes more dynamic. With regard to the development of a 3-5-year forecast of hosting capacity, we can see how this may be made possible by the more granular forecasting that Staff is requiring in Section 4.2 regarding advanced forecasting, but we encourage the Commission to carefully vet the methodologies for the development of these forecasts. Unlike more general load and other forecasts, hosting capacity is much more granular, and may need to be updated with new information on a regular basis, as forecasts for specific circuits could change significantly as individual DER projects are developed or if anticipated projects do not come to fruition or are delayed for one reason or another.

Section 4.11 Distributed Energy Resource Interconnections

Similar to the concerns we expressed in the preceding sections, we ask that the Commission carefully consider whether the sharing of certain information regarding DER interconnections could disclose information that may be may of a proprietary or otherwise competitively sensitive nature.[5]

Conclusion

Thank you for your time and consideration of these comments. We look forward to the Commission's issuance of the final guidance document, and remain available to answer any questions related to the above recommendations.

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[4] Proposed Commission Guidance for the Electric Utilities' DSIP Update Filings, P. 19
[5] Ibid. P. 27-28

Sincerely,

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