

January 28, 2025



TO: Alan Price and Steven Hong  
NYC Department of Buildings (DOB)  
Chief Currao and Alexandra Gjoni  
NYC Fire Department (FDNY)

CC: Julia Casagrande and Lydia Wiener  
NYC Mayor's Office of Climate and Environmental Justice (MOCEJ)

RE: **Hiring to Meet NYC Energy Storage Permit Application Pipeline**

Dear colleagues:

NY-BEST thanks the NYC Department of Buildings (DOB), the Office of Technical Certification and Research (OTCR), and the NYC Fire Department (FDNY) for your efforts to expeditiously review and process energy storage permitting applications in New York City.

Recognizing the significant time, effort, and expertise required to review each application, **NY-BEST urges the City to increase DOB / OTCR and FDNY staff capacity to process these applications**, in anticipation of a sharp increase in the number of proposed energy storage projects in NYC over the next two years.

This increase will be driven in large part by State policy and incentives. Notably:

- In 2022, Governor Kathy Hochul established a target of 6 GW of energy storage statewide by 2030. In support of reaching this target, in 2024 the Public Service Commission (PSC) **approved nearly \$2B in incentives** for energy storage projects.
- A significant portion of the 6 GW statewide need is anticipated to be installed downstate, due to the high electricity demand of urban centers, current reliance on fossil-fuel-powered peaker plants, and the opportunity to balance incoming offshore wind interconnections. Indeed, according to the *New York 6 GW Energy Storage Roadmap*,<sup>1</sup> **NYC will need approximately 2 GW of energy storage capacity within the five boroughs by 2030.**

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<sup>1</sup> New York State Department of Public Service (DPS) and the New York State Energy Research and Development Authority (NYSERDA). "New York 6 GW Energy Storage Roadmap: Policy Options for Continued Growth in Energy Storage," updated March 15, 2024. Accessed online: <https://www.nyserdera.ny.gov/-/media/Project/Nyserda/Files/Programs/Energy-Storage/Energy-Storage-Roadmap.pdf>.

- To date, approximately 31 MW of energy storage has been deployed in NYC, meaning **~328 MW of energy storage must be installed in the city *annually*** between 2025 and 2030 to meet the 2 GW need.
- To help meet this goal, the PSC has directed the New York State Energy Research and Development Authority (NYSERDA) **to launch incentive programs in Q1-Q2 2025** for Bulk (>5 MW) and Retail (<5 MW) storage, with specific targets for NYC:
  - **Bulk:** Of the 3,000 MW of energy storage capacity to be procured statewide by 2030 under the Bulk incentive program, the PSC requires *at least* 30% of projects (900 MW) to be located in NYC.
  - **Retail:** Of the 1,500 MW of energy storage capacity to be procured statewide by 2030 under the Retail incentive program, the PSC requires *at least* 25% of projects (375 MW) to be located in NYC, though NYSERDA's Implementation Plan indicates an elevated target of 50% of projects (750 MW) for NYC.

Particularly in light of the anticipated release of State incentives in the first half of 2025, the energy storage industry will be well-poised to meet the ambitious 2 GW x 2030 NYC target. According to a survey conducted by NY-BEST in January 2025, the eight most active developers in NYC collectively plan to submit **at least 320 proposed energy storage projects >1 MW** to NYC Authorities Having Jurisdiction (AHJs) over the next two years. We respectfully submit the survey data in Table 1 (next page) for your consideration. Notably, the pipeline of projects anticipated to be submitted for permitting review in 2026 and beyond may be greater than reflected by this data, as project opportunities continue to be evaluated.

To date, OTCR leadership has indicated an average intake of approximately 20 energy storage permit applications per year over the last several years. As the data below indicates, this is **primed to increase eightfold, to over 160 projects per year**, beginning in 2025.

Thus, **NY-BEST urges the City to fund additional staff lines and otherwise support OTCR and FDNY in streamlining permit review**, to ensure applications can be handled expeditiously, in line with City and State climate and equity mandates.

NY-BEST greatly appreciates the opportunity to provide this feedback and we are eager to continue to collaborate with the City to support the clean energy transition. Please do not hesitate to reach out with any questions or concerns; we would be happy to discuss further at your convenience.

Sincerely,



William Acker  
Executive Director



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

**Table 1:** Total number of energy storage projects >1 MW that eight energy storage developers plan to submit to NYC AHJs in 2025 and 2026. *Survey data aggregated by NY-BEST, Jan 2025.*

<b>1-5 MW projects</b>	<b>All of 2025</b>	<b>144-146 projects</b>
	Q1 2025	34
	Q2 2025	33
	Q3 2025	24
	Q4 2025	26-28
	<b>All of 2026</b>	<b>141-148 projects</b>
	<b>Total 2025-2026</b>	<b>285-294 projects</b>
	<i>Of these, how many indoors?</i>	<i>None / unknown</i>
<b>&gt;5 MW projects</b>	<b>All of 2025</b>	<b>13 projects</b>
	Q1 2025	2
	Q2 2025	1
	Q3 2025	1
	Q4 2025	9
	<b>All of 2026</b>	<b>22 projects</b>
	<b>Total 2025-2026</b>	<b>35 projects</b>
	<i>Of these, how many indoors?</i>	1 in 2025 3 in 2026
<b>ALL PROJECTS</b>	<b>TOTAL 2025-2026</b>	<b>320-329 projects</b>