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Submitted Electronically

TO: The Honorable Michelle L. Phillips, Secretary
New York State Public Service Commission
Three Empire State Plaza
Albany, NY 12223-1350

RE: Matter 24-00339: In the Matter of EV Infrastructure Interconnection Working Group.
Comments in response to the Modified Proposal for Streamlined Vehicle to Grid Queue Management in Electric Vehicle Make-Ready Program and Other Programs, submitted by Department of Public Service Staff in compliance with the Midpoint Review Order.

The New York Battery and Energy Storage Technology Consortium ("NY-BEST") is pleased to submit comments for consideration in the above referenced matter in response to Appendix C. of the Modified Proposal for Streamlined Vehicle to Grid Queue Management in Electric Vehicle Make-Ready Program and Other Programs Queue Management Proposal, filed April 14, 2025.

We greatly appreciate the Commission's consideration of our comments and recommendations. 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. Thank you.

Respectfully submitted,

A handwritten signature in black ink that reads "William P. Acker".

Dr. William Acker
Executive Director

ABOUT NY-BEST

The New York Battery and Energy Storage Technology Consortium (NY-BEST) is a not-for-profit industry trade association with a mission to grow the energy storage industry in New York. We act as a voice of the energy storage industry for more than 180 member organizations on matters related to advanced batteries and energy storage technologies. Our membership includes global corporations, start-ups, project developers, leading research institutions and universities, and numerous companies involved in the electricity and transportation sectors.

NY-BEST recognizes the significant opportunity to integrate electric vehicles (EV) onto the grid as energy storage resources through dynamic vehicle-grid integration strategies. EVs will soon represent a significant demand on the grid and potentially a large storage resource that can provide benefits to New York's grid. When either combined with stationary storage systems or connected via bi-directional charging infrastructure, EVs can support the integration of wind and solar necessary to decarbonize the electricity sector, provide additional resiliency to the grid, and help meet the State's aggressive goals for greenhouse gas (GHG) reductions.

INTRODUCTION

NY-BEST applauds the Commission for its work to incentivize a broad range of electric vehicle (EV) charging demand management technologies, crucial for supporting grid reliability with the growing EV market. NY-BEST supports the use of energy storage, managed charging software and vehicle-to-grid (V2G) technologies for demand management to prevent overloading the grid. We appreciate the opportunity to respond to the Department of Public Service Staff's (Staff) Modified Proposal for Streamlined Vehicle to Grid Queue Management in Electric Vehicle Make-Ready Program and Other Programs Queue Management Proposal, filed April 14, 2025. Our comments address topics in Appendix C, regarding reconvening of the Electric Vehicle Infrastructure Interconnection Working Group or for a different forum.

In our comments below, NY-BEST will discuss areas of opportunity and lack of transparency in EV interconnection processes for bidirectional load management technology, including battery energy storage systems (BESS) and bidirectional chargers or vehicle-to-grid (V2G) technology. Presently, deployment of bidirectional chargers and battery-backed EV chargers are disincentivized by a burdensome interconnection process and the lack of harmonization with the interconnection processes for standalone unidirectional EV chargers. NY-BEST recommends that a single working group focuses on queue management and bottlenecks in the interconnection process for both EV load and distributed generation, whether such a group is the second phase of the EVIIWG or the Interconnection Technical Working Group (ITWG).

COMMENTS IN RESPONSE TO APPENDIX C.

Appendix C. Harmonizing the application for bidirectional resources, such as V2X EV chargers and EVSE paired with storage.

NY-BEST recommends ensuring a working group is developed to address lack of transparency and fairness for bidirectional interconnection.

The EVIIWG has solely focused on queue management for unidirectional or V1G charger load, while the ITWG is focused on the resources that provide energy or distributed generation. For an increasing number of projects, EV load directly interacts with the interconnection process for bidirectional chargers and BESS; thus, the two processes should be harmonized together in one working group. Below NY-BEST will identify bottlenecks in the interconnection process for electric vehicle supply equipment (EVSE) projects paired with BESS that should be addressed in a future working group.

NY-BEST recommends establishing a standardized interconnection process and public interconnection queue for unidirectional EV chargers.

As the grid continues to electrify and developers identify the same areas on the grid for EV load projects, often via utility managed hosting capacity maps, there is increasing uncertainty around when and where competing projects are interconnecting. The Standard Interconnection Requirements (SIR) process has created a uniform, transparent, and timely procedure for developers of distributed generation. The SIR process has locked queue positions and a public interconnection queue for Distributed Energy Resources (DERs), while the process for interconnecting load – including EV charging load – is not transparent and difficult for developers to manage, particularly for larger projects that require traditional financing. The process for interconnecting EV chargers does not include any regulatory mandated timelines or commitments from the distribution utilities. This can lead to projects getting restudied well after service determinations and rulings are provided to developers. These restudies can lead to significant changes in scope (e.g., switching from overhead feeders to network, shifting from 480V to 120/208V service, or requiring blockhouses). These re-studies have, in some instances, been triggered by competing EV projects at different phases of development. NY-BEST recommends an addition of a publicly accessible interconnection queue for EV load to create transparency of where projects are interconnecting and where there is available capacity.

NY-BEST recommends harmonizing timelines of EV load and CESIR studies.

In addition to creating transparency in the interconnection queue, NY-BEST recommends addressing the misalignment of timelines between the EV load study and the SIR process for bidirectional chargers and EVSE paired with BESS. While the SIR process is more transparent, it is often much longer than the load study for unidirectional chargers. Consequently, because the interconnection processes for unidirectional and bidirectional projects are not harmonized, scenarios may arise where unidirectional projects “jump the queue,” receiving service determinations before older bidirectional projects that already started the interconnection process. This can directly reduce the hosting capacity remaining

for the bidirectional project, creating significant uncertainty and delays in V2G development. As a result, developers are disincentivized from pursuing bidirectional EV projects.

Appendix C. Connection timeline measure and reporting.

NY-BEST recommends establishing a list of interconnection timelines for different types of EV projects to identify bottlenecks.

A standard EV load interconnection has a shorter duration and is less complex than projects with bidirectional chargers and/or paired BESS. By publishing the timelines for each step of the EV load study and CESIR processes, utilities will be able to identify which areas of the interconnection process are taking more time or are facing bottlenecks. Notably, EV load interconnection studies are intermittently subjected to ‘feeder concurrence’ studies which may extend the timeline for review without a clearly defined outside time limit. NY-BEST suggests the Commission consider utility-published interconnection timelines and enforce regulatory mandated timelines that set a predetermined cap on how long a study can take to create transparency and identify bottlenecks in the interconnection process.

Appendix C. Bridging solutions, including flexible connection.

NY-BEST recommends the Queue Management Proposal clarify that all utilities must offer phased connection and consider co-located BESS as a phase-in approach for EV fleets.

Energy storage systems co-located with EV charging infrastructure can provide many benefits, including: adding immediate additional capacity for EV charging while avoiding or deferring expensive upgrade costs; reducing EV operating costs from demand charges by shifting charging times; and supporting the distribution grid more broadly. The Queue Management Proposal should consider co-located energy storage as a phase-in opportunity for customers to reap the benefits of immediate increased capacity at a charging site. This would reflect the reality that most vehicle fleet managers are planning to phase in their new EV fleet over time. While some facilities may require a utility upgrade to service fleets, other facilities may find energy storage provides enough additional capacity to phase-in adoption of their fleets, avoiding unnecessary grid upgrades. NY-BEST recommends that the Queue Management Proposal adopt phased interconnection as an option for all utilities and highlight BESS as an opportunity for phased connection.

CONCLUSION

NY-BEST appreciates the opportunity to provide these comments and looks forward to working with the Commission, the Joint Utilities, and other stakeholders to ensure the success of New York’s

transportation electrification efforts. We stand ready to assist with any questions you may have on these comments. Thank you for the opportunity to share our input and feedback.