

New York Battery and Energy Storage Technology Consortium

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September 10, 2026

Submitted Electronically

TO: Hon. Michelle L. Phillips, Secretary
New York State Public Service Commission
Empire State Plaza, Agency Building 3
Albany, New York 12223-1350

RE: **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
Case 24-E-0645: Petition of New York Independent System Operator, Inc. Regarding Public Policy Transmission Needs for Consideration for 2024

Comments on the Coordinated Grid Planning Process (CGPP) Cycle 1 Report

Dear Secretary Phillips,

The New York Battery and Energy Storage Technology Consortium (NY-BEST) is pleased to submit comments in response to the Joint Utilities' Coordinated Grid Planning Process (CGPP) Cycle 1 Report, filed May 4, 2026 and corrected on June 3, 2026, in the above-referenced proceedings.

We greatly appreciate the Commission's consideration of our comments. 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.

Sincerely,

A handwritten signature in dark ink, appearing to read "William Acker".

Dr. William Acker
Executive Director

A handwritten signature in dark ink, appearing to read "Claudia Villar-Leeman".

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

ABOUT NY-BEST

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 is primarily composed of companies involved in the electricity and transportation sectors, including manufacturers, project developers, and operators, along with leading research institutions, universities, government bodies, and utilities.¹

NY-BEST and our members are actively engaged in implementing the State's 6 GW by 2030 Energy Storage Roadmap and are committed to helping New York achieve a reliable, affordable, and modernized electricity grid on the path to 100% clean electricity by 2040.

BACKGROUND

On August 13, 2023, the Public Service Commission initiated the Coordinated Grid Planning Process (CGPP), directing New York's investor-owned electric utilities (the Joint Utilities, or JU) and Department of Public Service Staff to develop a least-cost portfolio of local transmission projects to facilitate the delivery of new clean energy resources under the Accelerated Renewable Energy Growth and Community Benefit Act. Over the past two years, the Joint Utilities, DPS Staff, NYSERDA, the NYISO, and stakeholders engaged through the Energy Policy Planning Advisory Council (EPPAC), conducted a five-stage planning process spanning capacity expansion modeling, network and power flow analysis, local solution development, cross-utility review, and least-cost portfolio selection.

The Joint Utilities filed the CGPP Cycle 1 Report, initially on May 4, 2026 and corrected on June 3, 2026, describing the analysis that led to a preliminary portfolio of 25 local transmission projects designed to collectively address shortfalls identified across a range of capacity expansion scenarios. The JU recommend 7 of these projects for PSC approval and funding in this Cycle, which would represent approximately \$8.7 billion in investment and 6.4 GW of incremental headroom.²

On June 24, 2026, the Commission issued a Notice Soliciting Comments requesting comments on (a) the CGPP Cycle 1 Report, (b) the Joint Utilities' request to develop the seven proposed local transmission projects, and (c) whether the Commission should identify any Public Policy Requirements that drive the need for transmission and should be referred to the NYISO to solicit and evaluate potential solutions through its Public Policy Transmission Need (PPTN) process. On July 29, 2026, the Commission extended the comment deadline to September 10, 2026.

¹ NY-BEST comments represent the interests of the organization as a whole and not the views of any single member. Our members have diverse interests and the organization's views are intended to be reflective of the energy storage industry collectively.

² CGPP Cycle 1 Report, Figure 28, p. 54.

COMMENTS

NY-BEST commends the Commission for the ambitious and groundbreaking approach to long-term grid planning that has been advanced under the Coordinated Grid Planning Process (CGPP) Cycle 1. Bringing together the NYISO, the Joint Utilities, DPS Staff, NYSERDA, and a broad range of stakeholders through a coordinated, multi-stage process to align generation and transmission planning is a significant undertaking, and NY-BEST supports the Commission's continued investment in this kind of proactive, system-wide approach.

However, given the scale of investment ultimately at stake, it is critical that the Commission be able to rely on granular, robust modeling before committing ratepayer funds. As detailed below, NY-BEST does not believe the current modeling results can be confidently relied upon.

Critically, **energy storage was not optimized in the modeling**, which could materially change both the forecasted resource mix as well as the local transmission needs identified to support it. This imprecision is compounded by the broader uncertainty facing the energy sector: significant delays have already emerged in achieving the State's 70% by 2030 renewable energy goal,³ and further uncertainty remains around both load growth as well as the pace of renewable and storage permitting and deployment, particularly amid federal headwinds and within New York's home rule framework. Given this uncertainty, it is critical that the CGPP modeling be accurately optimized and include additional sensitivities to identify the solutions with the greatest optionality.

Further, the needs identified by the proposed portfolio are unlikely to arise before 2035, leaving time to get this analysis right before approving specific projects. **Thus, NY-BEST urges the Commission not to approve the JU's seven proposed projects, nor refer any public policy transmission needs to the NYISO at this time.** Instead, the Commission should direct that the CGPP Cycle 2 process incorporate the improvements described below, to ensure that the resources added to the system are optimized and that we achieve the most cost-effective outcome for ratepayers. We suggest the Commission revisit the question of a PPTN referral once CGPP Cycle 2 has produced a more reliable basis for that determination.

NY-BEST provides the following points for the Commission's consideration:

- I. The CGPP Cycle 1 analysis fails to correctly model the resource mix.
 - A. Capacity Expansion Modeling does not capture the true value of energy storage.
 - B. Production Cost Modeling was severely underutilized.
 - C. LDES must be modeled as a DEFR to ensure cost-effective outcomes.
- II. The CGPP does not sufficiently analyze the best solutions for local transmission needs.
 - A. The evaluation of Energy Storage as a Transmission Asset (SATA) was inadequate.
 - B. The JU did not analyze cost-effective alternatives to project proposals.
 - C. Distribution-level resources should be considered in Cycle 2.
- III. The CGPP must be coordinated with other transmission planning processes.

³ New York State Department of Public Service and New York State Energy Research and Development Authority, Case 15-E-0302, *Draft 2026 Clean Energy Standard Biennial Review*, filed July 1, 2026, pp. 60-61, Table 8.

I. The CGPP Cycle 1 analysis fails to correctly model the resource mix.

The CGPP Cycle 1 modeling assumes that the State’s energy storage deployment goals are achieved across all scenarios; NY-BEST commends the Joint Utilities for recognizing the significant growth expected in the energy storage sector and the opportunity for energy storage to support the broader resource mix. However, as detailed below, the energy storage assets assumed in this modeling *are not optimized*, significantly impacting the resulting resource mix and local transmission needs identified.

Energy storage must be appropriately evaluated in both the Capacity Expansion Modeling, which determines the cost-optimal resource mix, and the Production Cost Modeling, which tests how that resource mix dispatches. In both stages, this includes evaluating Long-Duration Energy Storage (LDES) as a Dispatchable Emissions-Free Resource (DEFR) that can be leveraged to meet longer-duration dispatch needs. However, the CGPP Cycle 1 analysis failed to evaluate energy storage appropriately in either model, resulting in a resource mix that likely over-builds generation and relies too heavily on other, more costly DEFR resources.

A. Capacity Expansion Modeling does not capture the true value of energy storage.

A model reliant on a series of 24-hour snapshots cannot accurately capture energy storage value. The CGPP Capacity Expansion Modeling evaluated system needs using 13 representative days per model year, weighted to approximate a full year of conditions.⁴ This method “preserves chronology, including the state-of-charge (SoC) of battery storage resources, within each representative day,” but each representative day is “solved individually.”⁵ By forcing resources to start each day at zero SoC, storage cannot carry charge from one representative day to the next. For example, under the current model assumptions, a 4-hour battery cannot start charging before midnight to provide power the next day, resulting in non-optimal charging windows that limit the resource’s effectiveness. In addition, LDES resources, which are designed to charge when energy is lowest cost and discharge during extended periods, including by carrying charge across multiple days, were not included in the model at all; while they were intended to be included as a DEFR in the HCLO scenario, ultimately the DEFR assumptions reflected nuclear-based assets and did not capture the attributes of LDES, as discussed further in Section I.C. below. As a result of these shortcomings, the model identifies a need for greater renewable buildout and alternative DEFR capacity than would otherwise be necessary; a resource mix that fully captures energy storage’s ability to shift energy across days would very likely be more cost-effective.

Recommendation: The modeling should be run over a full 8,760-hour annual timeframe.

This is the best approach to fully capture the value of energy storage of various durations, while considering seasonal variation and system performance under weather extremes. NY-BEST recognizes that a full annual, hourly optimization is computationally intensive. A

⁴ NYISO, State Scenario Results, EPPAC presentation, June 17, 2024, slide 20. Accessed [here](#).

⁵ NYISO, Assumptions Matrix for Capacity Expansion Model, “Time Representation,” 2024. Accessed [here](#).

second-best approach is modeling a shorter representative period, such as a seasonal representative approach that links sample week-long periods together at a minimum, while allowing energy storage SoC to carry across those periods. E3's use of week-long modeling windows for the Climate Action Council Integration Analysis is a step in the right direction, but a longer timeframe remains preferable to the extent it is achievable. Given the scale of investment at stake, with the Joint Utilities proposing approximately \$8.7 billion for just seven local transmission projects in this cycle alone, the added computational cost of more rigorous modeling is a worthwhile investment to ensure that modeled energy storage resources are optimized, thereby enabling the resulting resource mix and transmission needs to be more accurately determined before ratepayer funds are committed.

B. Production Cost Modeling was severely underutilized.

The Joint Utilities engaged NYISO to run Production Cost Modeling (PCM) as a complement to Stage 1 Capacity Expansion Modeling results. PCM is a chronological, hourly dispatch model that is designed to minimize total system production costs, and is capable of providing a more granular test of how a given resource mix, including storage, performs and dispatches. As conducted in Cycle 1, the Joint Utilities and NYISO applied PCM with several significant limitations:

- The NYISO did not optimize storage dispatch in the PCM analysis. NY-BEST understands that the NYISO's PCM software, GE MAPS, cannot independently optimize storage dispatch, so the NYISO instead applied the daily storage dispatch shape produced by the Capacity Expansion Modeling to each zone. As a result, this approach carried forward the same 24hr-snapshot limitation as Capacity Expansion Modeling. This means the NYISO did not test whether a different storage dispatch pattern, such as one that carries charge across days, might perform better under the PCM's hourly simulation. NY-BEST understands the NYISO has explored Plexos, an alternative PCM platform capable of endogenous storage dispatch that was leveraged for the NYSERDA Energy Storage Roadmap modeling, but that it has not been updated for use in the CGPP process.
- NYISO performed only a single model run for each scenario in 2035. Without iteration, the results do not provide insight on whether alternative storage siting or dispatch assumptions would have produced different, potentially more favorable, results. Before spending significant ratepayer funding, the Commission must ensure additional PCM modeling runs are conducted for various years, with sensitivities on generation shape, energy storage placement, and nodal renewable siting, to ensure we are not locking in large infrastructure expansions that may not ultimately be cost-effective.
- NYISO did not secure PCM for local transmission constraints (p. 26). As a result, the PCM analysis could not be used to evaluate whether storage might resolve local transmission needs; it only provided insights into bulk transmission constraints.

Recommendation: Require more extensive, iterative PCM in Cycle 2. The PCM should be run over a timeframe sufficient to capture both intra-day and multi-day storage dispatch, with storage dispatch optimized endogenously, iterated across scenarios, and secured for local transmission constraints so it can meaningfully evaluate storage in the resource mix.

C. LDES must be modeled as a DEFR to ensure cost-effective outcomes.

The report defines DEFR to include “long duration energy storage, small modular nuclear reactors, hydrogen thermal generation, etc.” (p. 2, footnote 3). In practice, however, every DEFR candidate modeled was either based on a nuclear/ Small Modular Reactor (SMR) resource or hydrogen-based resource (including hydrogen fuel cells in the HCL0 scenario, and hydrogen combustion in the other scenarios). NY-BEST and other stakeholders in the EPPAC strongly advised for LDES to be included as a DEFR option, but ultimately it was not treated as such in the modeling assumptions. The report notes in the Sensitivity 3 description that testing an alternate DEFR “can significantly alter long-term resource mix decisions” (p. 19), underscoring the need to test LDES specifically as a DEFR option.

Recommendation: The Cycle 2 CGPP must include an LDES-specific DEFR scenario. This is critical to ensuring the most cost-effective outcome for the modeling, since the type of DEFR materially affects the resource mix and the local transmission investments built to support it. Since the earliest need-by date among the proposed projects is 2035, there is sufficient time to properly test LDES as a DEFR option in Cycle 2, instead of approving proposed projects based on insufficient modeling.

II. The CGPP does not sufficiently analyze the best solutions for local transmission needs.

After the Capacity Expansion Modeling identifies resource buildout, the later stages of the CGPP are designed to develop and evaluate specific transmission solutions to ensure the resources in the identified resource mix can interconnect and deliver energy as needed. However, the CGPP Cycle 1 analysis failed to appropriately evaluate energy storage or hybrid energy storage and transmission solutions as a cost-effective alternative to traditional transmission solutions. Further, in the Cycle 1 report, the JU put forward a portfolio of proposed transmission projects for Commission approval and ratepayer funding, but the proposal lacks detail and does not include consideration of cost-effective alternatives that could reduce impact to ratepayers. As a result, NY-BEST recommends the Commission decline to approve the JU proposals at this time, pending further analysis as described below.

A. The evaluation of Energy Storage as a Transmission Asset (SATA) was inadequate.

The JU considered four advanced technologies as “alternatives to, or components of, larger solutions designs,” including Energy Storage as a Transmission Asset (SATA), Dynamic Line

Ratings, Power Flow Controllers, and Advanced Conductors (p. 34). However, the Joint Utilities used a single generic storage profile, 100 MW to 400 MW for four hours (p. 36, Figure 19), with no longer-duration options considered. In footnote 36, the report acknowledges that “the snapshot-based power flow modeling is not able to fully determine whether energy storage can resolve a need,” but that “the Joint Utilities evaluated certain applications for energy storage but found that other technologies could more efficiently resolve the needs” (p. 35). The JU fails to provide any detail on how these “certain applications” were evaluated or whether that evaluation was sufficient to draw this conclusion. This is not an acceptable level of evaluation of SATA, which has the potential to avoid significant costly traditional upgrades when designed and applied appropriately.

Further, the four advanced technologies were treated as discrete, standalone options, with no indication that combinations, such as storage paired with smart inverter or grid-forming (GFM) capability, were evaluated. NY-BEST member Zenobē developed a whitepaper, *Opportunity for Storage As Transmission to Ensure Power Quality in New York*,⁶ which describes how storage with GFM capability can address power quality needs (voltage support, short-circuit current, inertia) that would otherwise require expensive traditional transmission equipment like synchronous condensers.

The JU notes that the capacity expansion model “did build varying amounts of market-based energy storage across all scenarios,” implying that storage was sufficiently accounted for in the modeling. NY-BEST strongly disagrees with this conclusion: storage selected by the Capacity Expansion Modeling as a capacity resource is distinct from whether storage was evaluated as a transmission solution to the specific local needs identified in Stage 3.

Recommendation: The Commission should direct the JU to fully evaluate SATA under Cycle 2. The analysis should include an assessment of the ability of both standalone energy storage of varying durations, as well as storage paired with other advanced technologies (such as GFM or smart inverter capability) or traditional wire solutions, to resolve, in whole or in part, each identified local transmission need. Finally, the JU should be required to provide detail on how SATA was evaluated for each local need, so that stakeholders can meaningfully evaluate whether SATA was appropriately considered.

B. The JU did not analyze cost-effective alternatives to project proposals.

The JU propose seven local transmission projects for Commission approval and ratepayer funding, representing approximately \$8.7 billion in investment (Figure 28, p. 54). However, the report provides minimal detail on any of the seven proposed projects beyond project name, zone, incremental headroom, cost, and timing (Figure 28, p. 54), making it impossible to assess whether storage or other alternatives could meet the same need.

⁶ Zenobē Americas Inc., *Opportunity for Storage As Transmission (SAT) to Ensure Power Quality in New York*, filed in Case 18-E-0130, February 24, 2025. Accessed [here](#).

The CGPP's stated Stage 3 process is to identify system needs and then develop and evaluate candidate solutions against those needs (p. 32-33), but the report does not document that the Joint Utilities evaluated alternative solutions to the seven proposed projects. In addition, as described in Section I, the modeling that determined the underlying resource mix did not optimize storage's ability to shift energy across days. It is therefore unclear whether all of the local transmission needs identified would remain the same if the energy storage in the resource mix were operated optimally. Further, depending on the pace at which renewable resources interconnect, energy storage could allow for a more modular approach, avoiding the risk of overbuilding relative to more rigid traditional solutions, and ultimately serving as a more cost-effective alternative or complement to some of the proposed projects.

Recommendation: The JU should provide additional project-level detail and complete a documented, case-by-case cost-effectiveness comparison with storage-based alternatives for each project before Commission approval. Given that the earliest need-by date among the seven projects is 2035, there is time to complete this analysis before these projects must proceed. The Commission should either defer approval of the projects to Cycle 2, pending this analysis, or direct a third-party study of alternatives to run concurrently with Cycle 2 planning. Absent this analysis, NY-BEST does not support funding the proposed portfolio at this time.

C. *Distribution-level resources should be considered in Cycle 2.*

The CGPP evaluated only transmission-level and transmission-connected solutions; distribution-level resources were not evaluated as a means of supporting identified local transmission needs. The report states, "Distribution system assumptions and constraints were reflected in load and DER forecasts and informed the assessment of local transmission needs," but that distribution-level resources were not evaluated in depth as an active solution to resolve or mitigate identified transmission needs.⁷ This is a missed opportunity, as other proceedings and independent analysis confirm that distribution-level storage can meaningfully contribute to transmission-level needs.

For example, in 2024, the Commission ordered that Marginal Cost of Service studies (which estimate the cost to serve new load and are used to quantify the value DERs provide in serving that load) must include avoided transmission costs in addition to avoided distribution costs,⁸ in recognition of the fact that distributed resources can defer transmission-level infrastructure investments.

Independent analyses reflect the same principle. For example, a PowerGEM report commissioned by NY-BEST, evaluating battery storage solutions to Con Edison's identified

⁷ CGPP Cycle 1 Report, p. 3, footnote 6.

⁸ New York State Public Service Commission, Cases 15-E-0751 and 19-E-0283, *Order Addressing Marginal Cost of Service Studies*, August 19, 2024, page 44.

NYC transmission reliability need, modeled battery storage at the bulk transmission level but noted that the bulk energy storage projects selected to meet the need “can be interpreted as an aggregation of multiple downstream projects, including as distributed energy storage.”⁹ In addition, Con Edison’s July 2026 *NYC Reliability Contingency Plan* similarly recognizes that “distribution-connected battery storage, when sited in the right locations, developed in the right quantities, and subjected to firm commitments, can assist in addressing transmission security needs,” and can “help alleviate transmission constraints by flexibly discharging when the grid is constrained during periods of peak demand.”¹⁰

Recommendation: Include distribution-level solutions in CGPP Cycle 2. The Commission should direct the JU to evaluate distribution-level storage and DER and grid flexibility solutions as a means of helping to meet identified local transmission needs at lowest cost.

III. The CGPP must be coordinated with other transmission planning processes.

The CGPP is one of several parallel processes through which New York plans and approves transmission and infrastructure investment, alongside the Proactive Planning Process, individual utility rate cases, and the NYISO Public Policy Transmission Need (PPTN) process. It is not clear when and how transmission projects already approved and in development through these other processes get incorporated into the CGPP’s modeling inputs. If not all projects are properly accounted for, the local transmission needs identified through CGPP and the resulting project proposals could overstate what is actually required.

Recommendation: To avoid the potential for duplicative infrastructure upgrade requests and unnecessary costs to ratepayers, the Commission should ensure that the timing of modeling and project approvals across these various proceedings is aligned, and that already-approved or in-development infrastructure upgrades are properly reflected in CGPP modeling inputs.

CONCLUSION

NY-BEST strongly supports the Commission’s continued investment in coordinated, long-term transmission planning through the CGPP. However, the modeling conducted for Cycle 1 did not appropriately evaluate energy storage, nor did it sufficiently analyze the most cost-effective solutions to local transmission needs.

NY-BEST urges the Commission to direct the JU to implement the improvements described above in Cycle 2. Given that the earliest need-by date among the seven proposed projects is 2035, there is time to get this analysis right before committing \$8.7 billion in ratepayer funds. Absent this

⁹ PowerGEM, *Ability of Energy Storage to Address Transmission Reliability Needs in New York City*, prepared for NY-BEST, March 26, 2026, p. 4. Accessed [here](#).

¹⁰ Con Edison, *New York City Reliability Contingency Plan*, filed July 17, 2026, Case 25-E-0764.

improved analysis, NY-BEST does not support Commission approval of the proposed portfolio at this time, nor does NY-BEST believe the Commission should refer any Public Policy Requirements to NYISO's PPTN process at this time; both determinations should await the modeling improvements described above.

NY-BEST appreciates the opportunity to comment and looks forward to continued engagement with the Commission, DPS Staff, the NYISO, and other stakeholders as the CGPP evolves.