October 7, 2021

PUBLIC ACT 21-53 – SECTION 3 – ENERGY STORAGE

REVISED NOTICE OF PROCEEDING AND TECHNICAL MEETING
AND REQUEST FOR WRITTEN COMMENT

I. Introduction

Pursuant to Section 3 of Public Act 21-53 (the Act), the Department of Energy and Environmental Protection (DEEP) initiates the above referenced proceeding and announces a Technical Meeting regarding a potential procurement for energy storage. The Act grants the DEEP Commissioner the authority to “issue requests for proposals for energy storage projects connected at the transmission or distribution level, including stand-alone energy storage projects and energy storage projects paired with Class I renewable energy sources or hydropower facilities,” to contribute to storage deployment goals, in combination with any program authorized by the Public Utilities Regulatory Authority, of 300 megawatts (MW) by December 31, 2024, 650 MW by December 31, 2027, and 1,000 MW by December 31, 2030. 1 Additionally, the Act lists specific considerations the Commissioner shall make when selecting proposals. 2

DEEP’s findings in the 2020 Integrated Resources Plan (IRP) support pursuing a storage procurement. As discussed in Objective 5: Upgrading the Grid to Support and Integrate Variable and Distributed Energy Resources, storage could be used to reduce and manage load and help balance intermittent resources. The IRP also lays out strategies to further such objectives, including Strategy 13, which focuses on supporting the development of energy storage resources that can support the reliable integration of variable renewables and avoid fossil peaking generation. Finally, the IRP discusses storage as one of a variety of resources that could be deployed to achieve the 100% Zero Carbon Electric Sector goal in furtherance of Objective 1: Decarbonizing the Electric Sector.

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1 Public Act No. 21-53 An Act Concerning Energy Storage, Sections 1 and 3.
2 The considerations are “(1) whether the proposal is in the best interest of ratepayers, including, but not limited to, the delivered price of such sources, (2) whether the proposal promotes electric distribution system reliability, including during winter peak demand, (3) any positive impacts on the state’s economic development, (4) whether the proposal is consistent with the requirements to reduce greenhouse gas emissions in accordance with section 22a-200a of the general statutes, and (5) whether the proposal is consistent with the policy goals outlined in the Comprehensive Energy Strategy adopted pursuant to section 16a-3d of the general statutes and the Integrated Resources Plan adopted pursuant to section 16a-3a of the general statutes” at 4.
II. Technical Meeting and Request for Written Comments

DEEP seeks stakeholder input to inform future energy storage procurements that may result from the procurement authority granted to DEEP by the Act. Therefore, DEEP will hold a virtual Technical Meeting on **Wednesday November 10, 2021 at 10:00 AM via Zoom**. DEEP is requesting presentations on the following questions for the Technical Meeting. Stakeholders should email DEEP.EnergyBureau@ct.gov to express interest in presenting at the Technical Meeting by **Wednesday, November 3, 2021 at 4:00 PM** indicating what question(s) they intend to present on. From the list of potential presentations, DEEP will select a set of presentations for the Technical Meeting. DEEP encourages stakeholder to, where possible, work together to limit the number of presentations and allow for more conversation at the Technical Meeting.

1. The Act contemplates a contract between the State’s two investor owned utilities (United Illuminating and Eversource, collectively the EDCs) and storage developers. What product would the EDCs be procuring?
2. Who would own and operate any procured storage facility? Is there a distinction between a grid facility and a market facility? What operational parameters should be required of the procured facility? Comment on how any contract would be structured, including but not limited to, how payments would ensure the facility achieves the claimed benefits.
3. How should DEEP evaluate the benefits and costs of any procured storage?
4. What operational parameters would maximize benefits to ratepayers?
5. What technologies are reasonably expected to be available in a procurement initiated within the next one to five years?
6. What is the expected timeline for long-duration storage to be commercially available? Comment on the potential for a pilot project for long duration storage if a full scale program is not appropriate. How would cost and benefits be evaluated in such context?
7. How can storage best be used to maximize achievement of public policy goals including integration of renewable energy, reduction of greenhouse gases, reduction of emissions in environmental justice communities, and reducing the energy burden on Connecticut residents?
   a. Should storage projects paired with Class I resources be required to be co-located with the Class I resource?
   b. Would location of storage within Connecticut reduce emissions from some of the older, dirtier oil units?
   c. Should there be a life cycle analysis of storage technologies? If so, how should such analysis be performed?
8. Should DEEP give preference to storage projects paired with Class I resources, or a subset of Class I resources (e.g. only zero carbon)?
9. How should DEEP evaluate positive impacts on the state’s economic development, as required by the Act?
10. What equity and environmental justice considerations should DEEP account for during project selection? How can a procurement under the Act maximize benefits to environmental justice communities?
11. How should any potential benefits to the electric distribution and transmission systems be evaluated?
12. What other considerations should DEEP consider in utilizing the authority under the Act?
Those interested in attending the Technical Meeting may register via Zoom with this link. DEEP will continue to engage stakeholders both formally and informally on this topic until such time as DEEP releases a Draft Request for Proposals.

DEEP will also accept the submission of written comments on these topics after the technical meeting. Written comments may be filed electronically on DEEP’s Web Filing System or submitted directly to DEEP at DEEP.EnergyBureau@ct.gov from November 10, 2021 to December 2, 2021 at 4:00 PM and should include “PA 21-53 Comments” in the subject line. All materials submitted by stakeholders and other participants in this proceeding will be posted on the DEEP’s Web Filing System.

The Connecticut Department of Energy and Environmental Protection is an Affirmative Action/Equal Opportunity Employer that is committed to complying with the requirements of the Americans with Disabilities Act. Please contact us at (860) 418-5910 or deep.accommodations@ct.gov if you: have a disability and need a communication aid or service; have limited proficiency in English and may need information in another language; or if you wish to file an ADA or Title VI discrimination complaint. Any person needing a hearing accommodation may call the State of Connecticut relay number - 711. Requests for accommodations must be made at least two weeks prior to any agency hearing, program, or event.