LIPA's 2022 IRP: Public Comments Log

<u>Exhibit</u>	<u>"B"</u>	

No	Org	Public Comment	LIPA/PSEG LI Response
1		This is ridiculous not thoroughly researched as I have spoken to many environmental scientists & as per most of them this is not a crisis just a fear tactic motivated by politics. This is something that can not be rushed. Both sources should be used.	In July 2019, New York State passed the Climate Leadership and Community Protection Act (CLCPA) that, among other targets, establishes the goal of 70% state-wide renewable energy production by 2030 and 100% zero-emission electricity by 2040. LIPA's integrated resource plan (IRP) is required to comply with the CLCPA targets.
2		Please provide information about the "increasing amounts of battery storage" required for conversion to altenergy on Long Island—where and by when? Tks	It is anticipated that energy storage, and specifically battery storage, will play a critical role in Long Island's future energy mix. The Climate Leadership and Community Protection Act (CLCPA) set a state-wide energy storage goal of 3000 MW by 2030, with LIPA's share expected to be approximately 375 MW. LIPA is currently evaluating responses to a recent Request for Proposal (RFP) for up to 200 MW of energy storage. Developers are allowed to propose storage projects located anywhere on Long Island.
3		hello lipower a fascinating article [referring to a Newsday article]. I want clean water and air. If my current electric bill is 176 dollars a month (balanced billing), lets assume my usage remains the same, what would my monthly bill be in 2030? That is an important piece of information left out of the article. Can I afford renewables, I know without subsidies, which only benefit people who have extra money. Solar is unaffordable for me. Please respond, I need to know.	Maintaining affordability of electricity for customers is a key objective of LIPA's Integrated Resource Plan (IRP). Consequently, the IRP will compare the cost of different resource options, which will vary over time and by location. However, the actual cost of specific resources will be evaluated at the time that LIPA conducts procurements to fulfill the needs identified in the IRP.
4		newsday states that one megawatt of offshore WIND can power 320 homes but the same one megawatt of SOLAR can only power 125 homes. please explain. why is that?	There is a difference between the maximum potential electric output of a generator (i.e., the capacity, commonly expressed as megawatts or MWs) and the generator's actual output during different hours. Wind and solar generate different amounts of electricity during a given period of time (e.g., a year) due to the availability of wind or sunlight, both which are highly variable and are therefore not consistently available. On average, though, a wind facility of the same size as a solar facility (e.g., 1 MW) generates greater amounts of MWs over a given timeframe and, therefore, can power more homes.
5		I just wanted to send a message to tell you how much I appreciate the fact that LIPA is moving forward with renewable energy for Long Island's power needs. We're approaching a tipping point in regards to our climate. Further use of fossil fuels will only make things worse. We have solar panels and geothermal heat pumps at our residence and absolutely love it. An electric vehicle is next. It's great to read that you are really thinking ahead and planning for future energy demand. It's a very smart thing that you're doing. Thank you.	Support for our efforts is greatly appreciated. Meeting the future energy needs of Long Island in a reliable, affordable, and environmental manner is a key priority for us.
6		[Commenter requests contact information for LIPA officials.]	Information was provided.

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7	LI Food and Water Watch	The following comments on the IRP are from Fred Harrison [contact information redacted]. Please acknowledge receipt of this communication. Thank you . Fred Harrison The IRP scope of study should be expanded to include a fifth "scenario" which would provide for a fully nonprofit energy plan for Long Island. It is incontestable that high energy costs sap economic growth and have contributed to Long Island's high cost of living. LIPA's Power Supply Agreements make up between 40 and 50 percent of ratepayer electric bills. The current private sector model of power supply imposes costs which are avoidable and unaffordable. According to industry reports, a 9-10 percent return is expected from investments in wind and solar. The IRP should set out a path for LIPA to bring those projects "in house", allowing for reduced power costs to ratepayers. This should include a study of all nonprofit power supply options, including partnering with NYPA. The proposed IRP scope of study currently proposes to "Identify the supply-side resource options necessary to meet the short and long-term resource needs under a variety of scenarios." This work should include nonprofit options. The Scope of Work objective #5, "Minimize rate impact to the extent practical," is unsatisfactory. Reducing the cost of electric power should inform the objectives of the study. With affordable-nonprofit electric power, Long Islanders are more likely to decarbonize, switching to electric heat, hot water, and transportation. Additionally, the IRP proposes that the "'Accelerated Decarbonization LIPA Scenario' (will) examine the potential impact of LIPA increasing investments in efficiency and/or electrification programs." This should include LIPA playing a central role in moving toward publicly financed residential and commercial solar.	LIPA recognizes that non-profit and tax-exempt financing, where permissible and available, can reduce the cost of supporting resource investments. However, such benefits can accrue to many, if not all resource options. Consequently, the IRP's comparison of resource options is likely to be more dependent on technology costs. In the course of procuring specific resources to meet the needs determined by the IRP, LIPA will consider ownership and financing options that could benefit customers. As an example, LIPA's bulk energy storage RFP will enable LIPA ownership of energy storage projects.

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8		I was referred to you by Mr. Rick Shansky, to whom I had addressed questions about the nation's potential long-term power needs that may be derived from the increasing usage of electric cars as alternatives to gasoline- or diesel-driven vehicles. I am following up on his reply. As I pointed out to Mr. Shansky, I see something of a parallel to the period following World War II, when the development of new, electricity-powered devices (home appliances, TV, stereo systems, etc.) coincided with the availability of wealth that had been accumulated during the war years when the country's industrial capacity was devoted primarily to the war effort and the available supply of many consumer products was limited. Currently, the COVID pandemic that curtailed consumer spending coincided with a comparable build-up of financial assets, and the new technology of battery-driven transportation seems likely to spur a transition to that mode of transportation. I would appreciate any information you have, or to which you can point me, about the likely long-term increase in the nation's demand for electric power from the substitution over time of battery-driven vehicles for internal combustion engines. For example, have there been estimates of the amount of power required for each average passenger car to be recharged? Is there an assumption about how much power each electric passenger vehicle and perhaps the average electric commercial vehicle will require annually? To the extent vehicles will be used for longer-distance travel, what is likely to be the need for charging stations along travel routes, and/or in connection with hotels and other stopping points? Is that likely to require significant capital expenditures in establishing a network of such charging stations in order to serve the traveling public? Please understand that I'm not seeking priviledged information that could be considered confidential and proprietary for LIPA. I'm hoping that you might be aware of one or more studies that may be available to the genera	

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9		Thanks, Team, for your response. However, could you clarify for me what the "comment period" is? Having spent a lengthy career in the investment industry, I'm familiar with the regulatory constraints that bar publicly held companies from releasing information that could give some investors an advantage over others, but I wasn't aware that LIPA was subject to such constraints. Is your "comment period" related to a quarterly, or perhaps semi-annual, report of operations? Or perhaps a release of other financial information that could be significant for bond holders? Otherwise, perhaps you could tell me when to expect the end of the comment period, and how I could expect to obtain the information I'm seeking? Permit me to repeat the nature of my request: I am not seeking answers to questions that are unique to LIPA or that might give me insight into any publicly trades securities. Perhaps, though, you are aware of publicly available information; for example, if a bank, or brokerage firm, or an electric utility industry association has prepared a study about the subject, and if that subject might be available to the general public, I'd appreciate hearing about it and, if possible, seeing a copy. Or your team members, or possibly someone known to your members, might have seen a study, or memo, indicating how much power must be provided by a source of electricity to recharge an automotive battery that's down to, say, 25% or, say, 10% of its capacity? I'd appreciate any information along those lines that your Team might be able to provide. Thanks for your consideration and your assistance. With kind regards, Robert I. Adler	Please refer to prior response.
10		What will this switchover do to the construction people, especially the steamfitter, plumber, and electrician. Will there be any work for the steamfitter in these renewable energy sources?	The impact of New York's Climate Leadership and Community Protection Act (CLCPA) on jobs in communities across the State, including on Long Island is being addressed by the State's Climate Action Council. More information can be found online at: climate.ny.gov.
11	Clearview Consultants, LLC	While Energy Storage, Geothermal, Ground-mount Solar and Offshore Wind have emerged as the LIPA's/PSEGLI's most popular/dominant among NYSPSC's longer list of approved Clean Energy Technologies, please don't overlook the following Clean Energy resources: Small-scale land-based Wind supported by Towns like Brookhaven and Hempstead with demonstration units already existing on Town-owned properties; The huge untapped MW capacity and energy potential of NYSPC-approved Tidal & Wave Energy technologies available along LIPA's Service Territory 300-mile coastline, where"every day, year in and year out, a constant pulse of untapped/unutilized predicable tidal power, identified and assessed in LIPA's 2007 Long Island Tidal and Wave Energy Study: An Assessment of the Resource by Natural Currents energy Services, LLC - issuu, exists; Nitrogen-fueled Fuel Cells; and The huge untapped MW available through one (1) of NY's/Li's best kept secretsthe enormous amounts (Tons/Day) of pre-consumer packaged (outdated) food waste being disposedwhich, given both the uninterruptable/sustainable supply of outdated disposed pre-consumer packaged food waste and NYSPSC's approved state-of-the-art Anaerobic Digester-based Clean Energy Technology.	The IRP will consider all viable, clean energy technologies. An external consulting firm has been hired to examine and provide guidance on which clean technologies can contribute to Long Island's future energy mix. In addition, we are discussing with Stony Brook University and Brookhaven Science Associates, LLC their potential participation in the development of LIPA's 2022 IRP with a focus on identifying emerging, viable, advanced clean energy technologies.

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12		The scope of the 2022 Integrated Resource Plan (IRP) is to "study the supply-side, demand-side, and transmission resources needed for LIPA to continue to provide reliable, environmentally compliant, and cost-effective electric service to customers on Long Island and the Rockaways." This plan will of course address LIPA's role in meeting the mandate of the CLCPA that 70% of the electricity consumed in the state must be produced using renewable sources of energy, as well as meeting other mandates and reliability requirements. In addressing these needs PSEG and LIPA's planning will necessarily address many conflicting and yet totally legitimate desires by different segments of our population for "more clean energy", "open space preservation", "faster transition to renewables", "stopping loss of real estate tax payments from fossil fuel generating plants", and "electricity price containment." To successfully manage these and other concerns, you must be seen by the people presenting them as actually listening to them, understanding their concerns, and at least attempting to accommodate those concerns to the extent possible in light of others' concerns and the overall needs of the electrical system and its transformation. People with concerns simply want to be heard by those they trust to actually listen to those concerns and to process them. They will often accept defeat if they think they have been treated fairly by those they trust. This process works best when there is trust between all the parties involved. Unfortunately, after the dreadful performance of PSEG Long Island under LIPA's supervision during Hurricane Isaias, there is about as much trust in these organizations by the general public as there was available electricity during the storm. Such trust is not built by press releases from management. Nor is it built by allowing three minutes of testimony at hearings or before Board votes on resolutions whose fate has already been decided. Nor is it built on receiving public testimony on proposed rate chang	LIPA looks forward to broad public engagement as it develops the IRP. As an example, we are in discussions with Stony Brook University and Brookhaven Science Associates, LLC to obtain critical input about the technologies that will be considered in the IRP. LIPA will consider other options for public engagement, including the formats suggested in the comment.

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12		I thus request that the next Utility 2.0 plan go beyond the traditional technical areas like efficiency programs and grid transformation to include the transformation of the relationship between PSEG and LIPA and the community they serve. The necessary trust must be built on a continued two-way open dialogue between a broad range of public interests and the people who manage the utility that serves those communities. This can be best achieved by forming a Community Advisory Council that engages with top LIPA management and the LIPA Board. Here are two models for such a council: The Brookhaven National Laboratory Community Advisory Council (CAC) "represents a diverse range of interests and values of individuals and groups who are interested in or affected by the actions of the Laboratory. "The CAC consists of representatives from 26 local business, civic, education, environment, employee, government, and health organizations. The CAC sets its own agenda, brings forth issues important to the community, and works to provide consensus recommendations to Laboratory management. Meetings are held on the second Thursday of each month, "CAC meetings are open to the public and interested community members are encouraged to attend. An opportunity for public comment is offered at each meeting. New members are welcome." https://www.bnl.gov/stakeholder/CAC.php Seattle City Light Review Panel: "The Panel is comprised of nine members drawn from among City Light's customers, to review and assess City Light's strategic plan and provide an opinion on the merits of the plan and future revisions to it to the Mayor and the City Council, and other roles as laid out by Seattle City Ordinance"	
12		"The nine panel members come from City Light's customer groups, as well as areas of utility business expertise. Panel member roles are Economist, Financial Analyst, Non-Profit Energy Efficiency Advocate, Residential Customer, Commercial Customer, Industrial Customer, Low Income Customer, At-Large Customer, Suburban Franchise Customer." https://www.seattle.gov/city-light-review-panel In fact, I strongly urge PSEG to use a process such as this during the preparation of the Draft IRP since it will allow the Plan's authors to better understand the conflicting and totally legitimate desires by different segments of our population as described above, and attempt to reconcile them before a Draft Plan is officially presented to the public and the DPS for on-the-record formal hearings. Thank you for your consideration.	See prior response.

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13	Association for a Better Long Island	Dear Mr. Falcone: July 21, 2021 The Association for a Better Long Island (ABLI), the region's leading economic development advocate, whose combined membership is LIPA's largest ratepayer, writes to urge the Long Island Power Authority ("LIPA") to strongly consider the cost to ratepayers of all transmission investments and/or projects for electric power supply when developing the 2022 Integrated Resource Plan ("IRP"). ABLI makes this request while commending LIPA's effort to achieve a carbon-free grid by 2040 and its shift to renewable energy. We recognize that the IRP will develop an action plan for LIPA to comply with NYS's Climate Leadership and Community Protection Act. Within that context, however, it is imperative that the cost to the ratepayer be given strong consideration when evaluating new major investments and/or projects to meet this NYS directive. Long Islanders continue to suffer from supporting costly energy initiatives. have been paying down the \$6 billion Shoreham atomic energy plant for decades and it remains one of the key reasons the cost of power on the Island is among the highest in the nation. We cannot endure another substantial cost burden if we expect our region to remain economically competitive with other regions of the country. Accordingly, the Association for a Better Long Island respectfully requests that LIPA strongly considers the additional cost to ratepayers of all transmission investments and/or projects for electric power supply when developing the IRP. ratepayers	Maintaining affordability of electricity for customers is a key objective of LIPA's Integrated Resource Plan

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14	Brooklyn College/ CUNY	As a long time resident of Nassau County, it is my view that the importance of this IRP for LIPA and the people of Long Island (and NY state) cannot be overstated. Across the country utilities are struggling to adapt to the intensifying challenges of climate change as they transition from fossil fuels to renewables. Indeed, the pursuit of an 80% renewable load and enhanced resilience requires the targeted integration of a variety of expert knowledges together, extensive coordination with regulatory bodies, and meaningful engagement with economic actors, ratepayers, local governments, and the broader public. There is nothing in these materials about an engagement plan. This must be corrected ASAP. Indeed, this IRP requires multiple engagement plans. The function of such plans is to gain the necessary knowledge needed to make these new programs and processes work not just affordably and reliably but justly and fairly as the CLCPA goals mandate. Other utilities have done this, most recently the Los Angeles Department of Water and Power (LADWP) with their LA 100 plan. In particular this IRP needs robust and individualized engagement plans for each of the following 1/ Supporting and meeting CLCPA goals 2/ Integrating substantial amounts of renewable energy resources 3/ Identifying the impacts of beneficial electrification 4/ Identifying the impacts of beneficial electrification 4/ Identifying benefits to disadvantaged communities 1/ and 4/ CLCPA goals mandate transition to renewables which take into account benefits to disadvantaged communities. How is LIPA/PSEG approaching this? What existing knowledge bases are being consulted? What knowledge is missing? Who are the partners? What kind of processes can enhance trust and collaboration? Is LIPA/PSEG aware of best practices like participatory action research and participatory budgeting? Has it looked at the LA 100 plan and the two year engagement process that was done? What is the plan for sustained engagement as the demands of the transition intensify along	LIPA is working with multiple stakeholders, including the New York Independent System Operator (NYISO) and New York State's Energy Research & Development Authority (NYSERDA), on developing plans to meet the Climate Leadership and Community Protection Act (CLCPA) targets. In addition, an external consulting firm with significant expertise in developing IRPs has been hired. We also plan to collaborate with Stony Brook University and Brookhaven Science Associates, LLC to identify emerging, viable, advanced clean energy technologies to ensure that we bring state-of-the-art thinking on current research and development activities to the IRP development process. LIPA will consider other options for public engagement, including the formats suggested in the comment. With regards to the impact on disadvantaged communities, the Climate Justice Working Group (CJWG), created by the Climate Leadership and Community Protection Act, has been tasked with identifying disadvantaged communities in NYS and developing the criteria to assess the impacts of transitioning to a clean energy system. The CJWG is conducting an extensive public engagement process to develop its guidance on disadvantaged communities. LIPA intends to incorporate the CJWG's guidance into its IRP process as it becomes available.

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14	Brooklyn College/ CUNY	[Even from the self interest perspective, LIPA-PSEG should support more engagement in order for the public to support the siting of new infrastructure. Engagement is essential for building trust and cooperation, especially given the current situation of so much distrust. Seeking to add new infrastructure without trust enhancing engagement will make it inordinately time-consuming at best and at worst incredibly contentious and slow if not impossible.] 2/ LIPA/PSEG must give a full report on its understanding of the Solar Roadmap done by the Nature Conservancy and others. This report shows that there is 15 GW of possibility on already developed land, from parking lots to large buildings. This could dramatically impact on LIPA/PSEG's goals for solar, and also, for how much storage would be needed to balance and integrate the solar. The strong track record of community solar across the country also creates an opportunity for PSEG/LIPA to support community solar both for renewables goals as well as "benefiting disadvantaged communities" goals. It could also lessen the need for additional transmission infrastructure. But also would require more demand response support infrastructure which would require more customer trust which requires more sustained engagement (see above). 3/ In the report, there is menton of the possibility of a "new customer program". This should definitely include multiple stakeholders and researchers, and be sure to include disadvantaged communities, as well as enhance resilience. And it should be clear on the benefits of electrification re: affordability and resilience for ratepayers as well as in terms of benefits to communities from reduced pollution from electrification of busses for example. Sincerely, Dr. Michael Menser; http://www.michaelmenser.info Associate Professor, Philosophy, Urban Sustainability Studies, Caribbean Studies; Doctoral Faculty, Earth and Environmental Science, Environmental Psychology; CUNY GC Member, Board of Directors; Participatory Budgeting Project Associa	

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15	Long Island Progressive Coalition	The 2022 Integrated Resource Plan will take public buy-in and input just for the siting of the new infrastructure alone. Public comments are not public engagement and we've seen recently that even public comments do not strongly impact LIPA's thinking. LIPA needs a real plan for community engagement that is currently missing. In the recent past PSEG has had to pull up utility poles because they did not properly engage local villages and towns, so their ability to properly site new grid upgrades and substations in a timely manner is suspect. Climate justice is core to the Climate Leadership and Community Protection Act and that means involving communities in the decisions that are going to impact them. Additionally, LIPA's contribution to CLCPA goals in the Integrated Resource Plan are way too low given the findings of the Long Island Solar Roadmap, which demonstrates our region has the potential for 19.5 GW of solar on already developed sites. We can and should be doing more while creating the same kind of collaborative partnerships that led to the formation of the Solar Roadmap. This plan seems to also be missing a key area of focus for our climate vulnerable region: adaptation, resilience, and grid reliability. We need to underground our power lines to start and ensure our system is prepared for the extreme weather events to come. This too will require deep investments in multi-stakeholder partnerships that are currently not in place. Given that confidence in LIPA is low right now and trust in PSEG even lower, we urge that you meaningfully involve and empower community organizations to shape this process through robust engagement.	The opportunity to develop additional solar resources, such as described in the Solar Roadmap, will be considered among the resource options to be evaluated in the IRP.

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16		All of the goals for this plan would be a whole lot easier to achieve with a municipally owned power gridget rid of PSEG completely, and with it their shareholders pulling profits out of the system to make rich people richer. All these changes are going to cost money, and when you have to ask, "Who's going to pay for this?", the answer is usually "you." We already have some of the most expensive electricity in the country on Long Island, and when there's a bunch of rich people looking for their cut in the middle, the People lose. With all the changes involved, there needs to be a whole lot more public engagement in this plan to build trust among stakeholder groups, like economic actors, ratepayers, local governments, and the broader public. After their abysmal response to Isaias, and reports from Newsday that they have not replaced or improved the computer system to coordinate future disaster response that was the center of me relying on my landlord's generator for almost 2 weeks, I know exactly 0 people who would trust PSEG to watch their pet rock. They've proven that their top priority is making shareholder wallets fatter, regardless of the harm to citizens and other businesses, and we have no time to waste arguing with them about that when we have so many other urgent priorities as you've laid out. Climate change is constantly increasing the odds of a hurricane hitting us at category 3 or worse, and of bigger winter storms. Our public agencies are not prepared for what is to come. How these improvements will make the overall system more resilient needs to be a major consideration, along with safety as many sources of power more geographically distributed, can mean shorter paths of distribution and less reliance on long distance transmission lines that can be disrupted, but may also increase the challenges of de-energizing an area for safe utility work. It's also not enough to just change the sources of energy; we must also systematically use less energy in the first place. Kilowath hours not used at all	LIPA looks forward to broad public engagement as it developes the IRP. Maintaining system reliability is a key objective of the IRP. The concept of grid resiliency in the face of climate change is part of this IRP objective and will be considered when developing 2022 IRP. LIPA's 2022 IRP will consider all viable demandside resources, including the impact of additional investments in energy efficiency programs on Long Island, which would reduce the total electric load forecast (i.e., expected energy use). With regard to equity, the Climate Leadership and Community Protection Act (CLCPA) requires that a minimum of 35% of the benefits from investments in transitioning to clean energy and energy efficiency programs be realized by disadvantaged communities. The Climate Justice Working Group (CJWG), which was created by the CLCPA, has been tasked with identifying disadvantaged communities in NYS and developing the criteria to assess the impacts of transitioning to a clean energy system. The CJWG is conducting an extensive public engagement process to develop its guidance on disadvantaged communities. LIPA intends to incorporate the CJWG's guidance into its IRP process as it becomes available.

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16		Treating all people equally isn't the same as equitably - we must impose most of the burden of using less energy on those who already waste the most of it. White-collar jobs are easiest to make remote, while those who are already stretched too thin to ask them for more sacrifices work the jobs that need to be in person, yet many aren't paid enough to live close to where they work so they can spend less energy commuting. While this is beyond the scope of stringing power lines and placing solar panels, public information campaigns to create social pressure is the sort of outside-the-box thinking we need. Think of the public pressure campaigns from World War II, "Don't you know there's a war on?", shame the rich for their excesses. Make the price per kWh proportional to the assessed value of each home, use the increase in net worth of executives and major shareholders/owners last year for a business. Some people have disabilities that make what are luxuries to some into basic necessities - it's important to take those situations into account as well. I'm not saying this is easy - the easier solutions might have been enough if we started this process 40 years ago, now is the time for Google's "Work fast and break things" model. Just make sure the breaking is progressive - hurt the top 10% the worst, protect the bottom 50%.	See prior response.

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17	NY-BEST	Response was 10 pages. Refer to attachment. Extensive comments on the role of energy storage in the IRP, including: - Existing goal of 375-400 MW of energy storage on LI is not sufficient to meet the 70x30 and 100x40 goals. - Consideration should be given not only to the 2022-2030 timeframe, but also to the 2040 time horizon. - Energy storage should be used to replace fossil-fueled peaking power plants. Per NY-BEST study, 2,300 MW of fossil fueld peaking units on LI can be replaced with energy storage. - LIPA should consult with industry experts and NYSERDA on the cost assumptions used in the IRP. - Incorporate the role of energy storage as a T&D asset - Consider different resource and load growth scenarios - Consider the value of "optionality" to reduce the risk of sub-optimal economic outcome - Modeling of energy storage should not be limited to four hours as energy storage can be designed with any desired duration. - Consider multiple EV growth scenarios and local effects from concentrated adoption in particular areas. - Consider emerging vehicle-to-grid technology in the modeling. - Would new PSAs with clean dispatchable assets such as energy storage be beneficial? Consider expanding its approach to energy storage to incorporate long-term PSAs and third-party ownership. - Rename task "Transmission projects necessary to support achievement of objectives" to "Energy delivery projects to support achievement of objectives." - Rename task "Potential fuel security issues" to "Potential energy security issues" reflecting the fact that we expect most "fueled" assets to be phased out. - Modify the "Accelerated Transmission Investment Scenario" to be the "Accelerated Transmission and Energy Storage Investment Scenario."	LIPA appreciates NY-BEST's comments on the role that energy storage can play in developing LIPA's Integrated Resource Plan (IRP). It is important to note that while LIPA intends to meet state mandates for deployment of energy storage resources, it will not artificially limit the amount of energy storage that might be cost effectively and reliably deployed. IRP recommendations regarding potential resource portfolios will carefully consider and balance the multiple considerations, such as those mentioned in your letter (e.g., cost, resiliency, peak load reduction, and transmission and distribution investment deferral), that attend introducing or expanding any resource technology in LIPA's portfolio. Further, LIPA will consider the results and conclusions of external studies in developing the IRP.
18		Regarding Wind, Solar, & Battery backup. I feel there is a place for this type of energy within a power grid. Unfortunately, Wind & Solar are less reliable than conventional power sources. New York City, Westchester, & parts of Long Island have many underground cables which become a giant capacitor in off peak load periods. Present day methods to control the voltage require large power generators to absorb Mvar's in the off peak & the reverse during peak load periods. The many generators that are normally on line in NYC & LI affect the entire state. I strongly suggest the you discuss this issue of Voltage & Frequency control with both the public utilities & the NYISO. The general stability & reliability of the power grid & providing low cost energy to the consumer is of the utmost importance. Thomas Leo Retired Con Ed System Operator	Regarding resource intermittency and reliability considerations, PSEG LI's transmission, distribution, and operations' engineers, along with an external consulting firm that has been hired to provide additional analytical support, will be carefully examining the impact of integrating an increasing amount of intermittent energy resources into Long Island's electric grid. While Long Island's and NY State's energy resource mix may look substantially different in the future, it will nevertheless meet all reliability standards and requirements.