

Residential and Retail Energy Storage Inclusive Storage Incentives: Proposed Program Rules

Feedback Requested: May 13, 2025 through June 3, 2025 by 3:00 pm Eastern Time

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1. Purpose

The purpose of this document is for the New York State Energy Research and Development Authority (NYSERDA) to share draft program rules with stakeholders for the Inclusive Storage Incentive (ISI) incentives supporting deployment of residential and on-site retail (distributed commercial-scale) energy storage projects benefiting disadvantaged communities and obtain responses to specific program design questions.

The proposed program rules are based on the New York Public Service Commission's (PSC) June 2024 *Order Establishing Updated Energy Storage Goal and Deployment Policy* and February 2025 *Order Approving Implementation Plan With Modifications*. The rules incorporate lessons learned from other NYSEDA programs serving disadvantaged communities and informal feedback received from energy storage stakeholders.

NYSERDA requests that stakeholders review the draft rules and respond to specific program design questions below, to the extent that they are applicable to their experience or business model. Stakeholder responses will help NYSEDA refine and finalize the program rules to ensure they effectively serve disadvantaged communities while supporting New York's broader energy storage deployment goals.

2. Background

On June 20, 2024, the PSC issued an Order establishing an expanded statewide energy storage goal of 6 GW by 2030, including authorization of funding for new NYSEDA incentive programs to support the deployment of 200 MW of residential energy storage and 1,500 MW of commercial-scale distributed ("retail") energy storage by 2030. The 2024 Storage Order also included directives pertaining to minimum incentive program procurement requirements pertaining to on-site energy storage (residential and behind-the-meter retail storage systems) and off-site energy storage projects, namely that:

1. A minimum of 35% of procurements for off-site retail projects be located in NYISO Capacity Zones G (Mid-Hudson Valley), H (Lower Hudson Valley-Westchester), I (Westchester), J (New York City) and K (Long Island), with at least 30% of total procurements in Zone J; and
2. A minimum of 35% of residential and on-site retail energy storage projects be located within Disadvantaged Community census tracts.

The 2024 Storage Order directed NYSEDA to propose how it would design its incentive programs to meet the above directives as part of an Implementation Plan describing program design, budgets, and other program elements pertaining to the Residential and Retail energy storage programs. This Implementation Plan was filed by NYSEDA in August 2024 and was subject to a 60-day public comment period for stakeholder feedback. In it, NYSEDA described proposed design, budget, and eligibility requirements for a targeted incentive, termed as the Inclusive Storage Incentive (ISI), to support deployment of residential and on-site retail storage projects benefitting disadvantaged communities, and indicated that additional stakeholder engagement would be conducted to finalize ISI design and eligibility criteria prior to program

launch.¹ In February 2025, the Public Service Commission approved (with modifications) the Residential-Retail Storage Implementation Plan, and directed NYSERDA to continue engagement with stakeholders to finalize ISI program rules.

3. Inclusive Storage Incentives: Program Design

3.1 Residential and Retail Energy Storage Program Basics

3.1.1 MWh Block Structure

The Residential and Retail energy storage incentive programs are structured as a series of capacity-based “MWh blocks” or segments, with incentive rates (in dollars per kilowatt-hour, or kWh, of installed usable capacity) and funding amounts set for predetermined blocks. The total incentive funding for a project is calculated by applying the incentive rate associated with the block from which a project was awarded an incentive to the project’s usable installed energy storage capacity, up to 20 MWh of capacity for Retail projects and 25 kWh of capacity for Residential projects. Incentives will be awarded to approved applications based on the block open at the date of application submission. When each open block becomes fully subscribed, the incentive level may change in subsequent blocks.

3.1.2 Participating Contractors and Incentive Applications

In the case of both the Residential and Retail programs, energy storage systems will be incentivized for customers through a network of Participating Contractors who will contract directly with the customer and NYSERDA. Contractors will be approved by NYSERDA to enter the program based on their experience and references, with specific requirements defined in the [Program Manual](#).

3.2 Retail Inclusive Storage Incentive

The Retail Inclusive Storage Incentive (Retail ISI) is a targeted, higher-than-market-rate incentive to be made available to eligible on-site² Retail energy storage projects sited at and serving eligible critical facilities located in Disadvantaged Community census tracts as defined by the New York State Climate Justice Working Group.

¹ In the same Implementation Plan, NYSERDA also proposed program procurement minimums to comply with the 2024 Storage Order’s directive regarding off-site retail projects, namely, that a minimum total of 750 MW (50 percent of total Retail incentive capacity allocations) would be allocated to the New York City region (NYISO Zone J), and a minimum total of 150 MW (10 percent of total Retail incentive capacity allocations) would be allocated to the Con Edison Westchester region (NYISO Zones H and I). These proposals were approved by the PSC via its February 2025 Order approving (with modifications) the Residential-Retail Energy Storage Implementation Plan, and are outside the scope of this RFI, which focuses on residential and on-site retail energy storage projects.

² On-site retail energy storage projects are defined as those systems physically and permanently located at an end-customer's site and behind the same utility host meter, and that are not allocating any credits to remote off-takers through remote crediting, remote net metering, or community distributed generation.

3.2.1 Project Eligibility

To be eligible for the Retail ISI, projects must meet each of the following criteria:

- Meet all requirements of the Retail Energy Storage Program as listed in the Program Manual
- Be grid-connected
- Be sited in a Disadvantaged Community census tract as defined by the Climate Justice Working Group
- Be sited at an eligible public or nonprofit critical facility (see Critical Facilities List section)
- Be 5 MW-AC or less in size in capacity
- Be interconnected behind the customer's utility meter

3.2.2 Eligible Critical Facility Inclusion Criteria

The proposed list of critical facility types was developed based on a framework incorporating the following key criteria:

1. **Provision of Essential Services:** The list prioritizes facilities that provide essential services to disadvantaged communities during and immediately after emergencies or grid outages. This includes medical facilities, emergency services, and critical infrastructure.
2. **Suitable Load Profile for Energy Storage:** Based on the facility's energy load profile, energy storage systems serving the facilities should sufficiently provide crucial backup power capabilities, helping maintain operations during power outages and enhancing community resilience.
3. **Direct Community Benefit:** The facility should directly serve members of disadvantaged communities.
4. **Public Benefit**
 - a. The facility must be owned and/or operated by an entity demonstrating public or nonprofit status with a ruling letter from the U.S. Internal Revenue Service that was in effect as of the declaration date and granted tax exemption under sections 501(c), (d), or (e) of the Internal Revenue Code; or documentation from the state substantiating it is a non-revenue producing, nonprofit entity organized or doing business under state law.
 - b. The facility must meet all of the following conditions:
 - i. Facility use is not limited to any of the following:
 1. A certain number of individuals;
 2. A defined group of individuals who have a financial interest in the facility, such as a condominium association;
 3. Certain classes of individuals; or
 4. An unreasonably restrictive geographical area, such as a neighborhood within a community.
 - ii. Facility access is not limited to a specific population (such as facilities with gates or other security systems intended to restrict public access).
 - iii. Facility access is not limited to a specific population (such as facilities with gates or other security systems intended to restrict public access).
 - iv. Any membership fees meet all of the following criteria:
 1. Are nominal;

2. Are waived when an individual can show inability to pay the fee;
 3. Are not of such magnitude to preclude use by a significant portion of the community; and
 4. Do not exceed what is appropriate based on other facilities used for similar services.
- v. Certain types of facilities that restrict access in a manner clearly related to the nature of the facility, such as senior centers, center-based childcare, custodial care, rehabilitation, or educational facilities; or houses of worship that limit membership in the organization to individuals who share a religious faith or practice, are still considered to provide essential social services to the general public.
5. **Reliance on Existing Frameworks:** To ensure objectivity and minimize discretion in the NYSERDA program review process, the list relies upon established definitions of critical facilities used in other government-led resilience, emergency management and disaster recovery programs, most prominently the Federal Emergency Management Agency Public Assistance Program and Policy Guide.

3.2.3 Proposed List of Eligible Critical Facilities

- Emergency medical care (diagnosis or treatment of mental or physical injury or disease) provided in:
 - Clinics
 - Dialysis facilities
 - Facilities that provide in-patient care for convalescent or chronic disease patients
 - Hospices and nursing homes
 - Hospitals and related facilities, including:
 - Central service facilities operated in connection with hospitals
 - Extended-care facilities
 - Facilities related to programs for home-health services
 - Laboratories
 - Self-care units
 - Storage, administration, and record areas
 - Long-term care facilities
 - Outpatient facilities
 - Rehabilitation centers
 - Pharmacies
 - Home Care
- Emergency Services
- Police
- Ambulance
- Fire protection
- Rescue
- Utility

- Irrigation to provide water for drinking water supply, fire suppression, or electricity generation
- Sewer and wastewater collection, transmission, and treatment
- Water treatment, transmission, and distribution by a water company supplying municipal water
- Education
- Primary or secondary education as determined under State law and provided in a day or residential school, including parochial schools; OR
 - Higher-education institutions that meet all of the following criteria:
 - Admit students or persons having a high school diploma or equivalent;
 - Are legally authorized to provide education beyond a secondary level;
 - Award a bachelor's degree or 2-year degree that is acceptable as full credit toward a bachelor's degree or provides at least a 1-year training program to prepare students for gainful employment in a recognized occupation; and
 - Are accredited by a nationally recognized agency or association (as determined by the Secretary of Education).
- Educational facilities that meet the above criteria are eligible without regard to religious character or use for religious instruction
 - Administrative and support facilities essential to the provision of the critical service are eligible facilities.
- Facilities that do not provide medical care, but provide:
 - Alcohol and drug treatment and other rehabilitation services
 - Assisted living
 - Custodial care, even if the service is not provided to the general public (including essential administration and support facilities)
 - Childcare
 - Center-based childcare, even if not provided to the public
 - Day care for individuals with disabilities or access and functional needs (for example, those with Alzheimer's disease, autism, muscular dystrophy)
 - Food assistance programs, including Food Banks and storage of food for Food Banks
 - Health and safety services, including animal control services
- Homeless shelters and Supportive Housing
- Houses of worship
- Libraries
- Low-income housing (as defined by Federal or SLTT law or regulation)
- Residential and other services for families of domestic abuse
- Residential services for individuals with disabilities
- Senior citizen centers
- Shelter workshops that create products using the skills of individuals with disabilities
- Jails, correctional facilities and detention facilities;
- Facilities used in emergency response, including emergency and cooling shelters, emergency preparedness, communication, and operation centers

- Major food distribution centers, including grocery stores (with an annual expected volume of greater than 170,000,000 pounds)

3.2.4 Critical Facility Verification Requirements

In order for a critical facility to qualify for the Inclusive Storage Incentive, it must meet all the following eligibility requirements:

1. **Project Geo-eligibility** demonstrated by a project’s location in a Disadvantaged Community census tract as defined by the Climate Justice Working Group. Location will be automatically verified by NYSERDA’s application system based on project address.
2. **Nonprofit Status** demonstrated with a ruling letter from the U.S. Internal Revenue Service that was in effect as of the declaration date and granted tax exemption under sections 501(c), (d), or (e) of the Internal Revenue Code;
3. **Utility Interval Load Data** demonstrated with
 - a. Actual electricity consumption records AND
 - b. Third-party verified power usage
4. **Manufacturer Specification Sheets** for Critical Equipment
 - a. Technical datasheets for critical equipment AND
 - b. Standardized power requirement documentation
5. **Professional Energy Audit Report** with comprehensive load analysis prepared by certified energy professional
6. **General Facility Classification Documentation** (One of the following)

The following should take the form of official, government-issued documents that explicitly state the facility’s critical infrastructure or emergency response role. All documents must be current (within the last 2 years) and must include the facility name, address, and official designation.

- a. Government-issued license
- b. State or federal registration document
- c. Official government designation letter
- d. Certificate showing critical infrastructure status from electric utility, state emergency management agency, local government emergency planning committee, or Homeland Security critical infrastructure designation

7. **Specific Facility Classification Documentation** (All relevant)

Facility Category	Required Document 1	Required Document 2
Hospitals	New York State Department of Health Operating (NYSDOH) Certificate	Facility Registration from NYSDOH
Hospital Central Service Facilities	Hospital Operating Certificate	NYSDOH Ancillary Services Approval
Clinics	NYS Article 28 Clinic License	Facility Registration from NYSDOH

Convalescent Care Facilities	NYSDOH Residential Health Care Facility License	Medicare/Medicaid Certification
Dialysis Facilities	NYSDOH Dialysis Facility Certification	Medicare Certification for Dialysis Facility
Hospices	NYS Hospice Operating Certificate	NYSDOH Hospice Services Registration
Nursing Homes	NYS Adult Care Facility License	Office of Aging Facility Registration
Rehabilitation Centers	State Rehabilitation Facility License	Professional Certification of Rehabilitation Services
Emergency Medical Services	NYS EMS Operational Certificate	Local Government EMS Registration
Ambulance Services	NYSDOH Ambulance Service Certificate	County/Municipal Emergency Services Registration
Fire Protection Services	State Fire Marshal Certification	Local Fire Department Operational Authorization
Rescue Services	State Emergency Management Certification	Local Government Emergency Services Registration
Primary/ Secondary Schools	NYS Education Department School Registration	Charter/ Incorporation Documentation
Higher Education Institutions	NYS Education Department Institutional Authorization	Accreditation Documentation
Childcare Centers	Office of Children and Family Services License	Local Government Childcare Facility Registration
Homeless Shelters	NYS Office of Temporary and Disability Assistance License	Local Government Shelter Certification
Water Treatment Facilities	Public Water Supplier ID	Inclusion in DOH Water Supply Distribution Mapping
Wastewater Treatment	State Pollution Discharge Elimination System (SPDES) permit number	
Food Banks	NYS Department of Agriculture and Markets Registration	IRS 501(c)(3) Non-Profit Determination Letter
Pharmacies	NYS Board of Pharmacy Permit	DEA Controlled Substance Registration
Senior Centers	Office for the Aging Facility Certification	Local Government Senior Services Registration
Domestic Violence Shelters	NYS OTDA Shelter Certification	Confidential Operational Authorization
Correctional Facilities	State Commission of Correction Facility Certificate	Local Governmental Operational Authorization
Extended Care Facilities	Adult Care Facility License	
Home Health Service Programs	Home Care Services License	NYSDOH Home Care Registration
Medical Laboratories	NYS Clinical Laboratory Permit	CLIA (Clinical Laboratory Improvement Amendments) Certificate

Self-Care Units	Attached to Primary Facility License	Operational Authorization from Governing Body
Hospital Storage/ Admin Areas	Hospital Operating Certificate	Facility Floor Plan Showing Critical Areas
Long-Term Care Facilities	Long-Term Care Facility License	State Medicaid/Medicare Certification
Outpatient Facilities	Article 28 Outpatient Facility License	Operational Services Registration
Home Care Services	Home Care Services Operating Certificate	NYSDOH Home Care Registration
Water Irrigation Facilities	Public Water Supplier ID	
Assisted Living Facilities	Adult Care Facility License	State Office of Aging Registration
Custodial Care Facilities	Adult Care Facility License	NYSDOH Operational Certificate
Disability Day Care Centers	Office of Children and Family Services License	Disability Services Operational Authorization
Specialized Disability Day Care	Disability Services Operational Permit	Local Government Special Needs Care Registration
Food Assistance Programs	501(c)(3) Non-Profit Registration	State Agriculture and Markets Food Program Certification
Food Bank Storage Facilities	Warehouse/ Storage Facility License	Food Safety Compliance Certificate
Animal Control Services	Municipal Animal Control Authorization	State Department of Agriculture Animal Services Registration
Houses of Worship	IRS 501(c)(3) Determination Letter	Local Zoning/Occupancy Permit
Public Libraries	State Education Department Library Registration	Municipal Library Operational Authorization
Disability Shelter Workshops	State Workforce Development Certification	IRS Non-Profit Status Determination
Emergency Shelters	OTDA Emergency Shelter Certification	Local Emergency Management Shelter Registration
Major Food Distribution Centers	State Agriculture and Markets Registration	State Agriculture and Markets Registration

8. Proof of active operation (All)

- a. U.S. Internal Revenue Service documentation for most recent tax year
- b. Previous 6 months of utility bills

9. **List of services** provided in the facility, when, and to whom
10. **Proof of population served** (census data, attendance data including disadvantaged community attendance demographics – see climate.ny.gov [website](#) for more information about Disadvantaged Communities Criteria data indicators, map of service etc.)
11. **Fee policy or description of fees charged**, including proof of policy regarding waiving memberships, if relevant

3.2.5 Required Documents for Multifamily Affordable Housing

Energy storage projects serving Multifamily Affordable Housing residents are eligible for the Retail ISI if they meet all requirements of the Retail Energy Storage program as listed in the Program Manual, and the project is sited at an affordable housing property that has documented eligibility (see below) and offsets the usage of the affordable housing property (is located behind-the-meter).

For projects applying for the ISI for a Multifamily Affordable Housing customer, the contractor or builder must provide proof the site is located at an affordable housing property via one of the following eligibility pathways:

Eligibility Proxy	Details	Documentation Required
A. US HUD, USDA-RD, and other Federally Regulated LMI Housing	Properties that receive subsidies from HUD or USDA-RD based on household income may be defined as LMI, based on household income criteria detailed in the contract or award, including regulatory control or structures such as: <ul style="list-style-type: none"> • Project-based Section 8 • Sections 202, 236, 811 • Public Housing Authorities 	Copy of the HUD contract or contract award notice
B. NYS HCR-Regulated Affordable Housing	Properties with subsidized mortgages or contracts that place them under the regulatory control of HCR may be defined as LMI, based on household income criteria detailed in the HCR contract or award	Copy of HCR contract or contract award notice
C. Low Income Housing Tax Credits	Properties that receive tax credits may be defined as LMI based on household income criteria detailed in the tax credit award notice	Copy of tax credit award notice from HCR or HPD.
D. NYCHPD-Regulated LMI Housing (or similar local housing agencies)	Properties with loans, mortgages, or deeds of purchase (HDFC incorporation) from NYCHPD or similar local housing agencies may be defined as LMI, based on household income criteria detailed in the award documentation	Documentation of current mortgage, loan closing, HDFC incorporation, or deeds
E. SONYMA Mortgage Insurance	Properties subsidized for low- to moderate-income multi-family residents with SONYMA subsidized financing through the HFA	Copy of loan closing/mortgage insurance award documents
F. Participation in NYS HFA's 80/20 Program or similar HFA-regulated offerings	Properties that have been accepted into the HFA's 80/20 Program, or similar HFA-regulated offering, may be defined as LMI based on household income criteria detailed in the contract or award.	Copy of the award letter or HFA contract documents.
G. Participation in NYC HDC's 80/20 or Mixed Income Programs or similar HDC-regulated offerings	Properties that have been accepted into the NYC HDC's 80/20 or Mixed Income Program, or similar HDC-regulated offering, may be defined as LMI based on household income criteria detailed in the contract or award.	Copy of the award letter or HDC contract documents.

3.2.6 Capacity Allocation

Based on historical deployment trends, interconnection activity, and program uptake of on-site and off-site Retail projects, NYSERDA estimates that on-site Retail incentive allocations are not likely to exceed 10 percent of overall Retail incentive allocations, i.e., 150 MW of the overall 1,500 MW Retail storage program authorized by the 2024 Storage Order. Accordingly, NYSERDA will allocate a minimum of **60 MW** (i.e., 40% of the expected upper bound of on-

site Retail procurements) to the Retail Inclusive Storage Incentive (Retail ISI), with additional allocations subject to on-site Retail procurement levels.

3.2.7 Incentive Block Sizes and Rates

NYSERDA will allocate capacity of 15 MW/45 MWh at an incentive rate of **\$350/kWh** to the first block of the Retail ISI. Capacity allocations and incentive rates for future Retail ISI blocks to be determined based on analysis of prevailing market conditions, uptake trends, and stakeholder feedback. At any given time, there will be a single statewide Retail ISI block in effect; in other words, the Retail ISI blocks will not be subdivided by region.

3.3 Residential Inclusive Storage Incentive

The Residential Inclusive Storage Incentive is a targeted, higher-than-market-rate incentive to be made available to eligible grid-connected residential (i.e., installed behind a residential meter) energy storage projects serving disadvantaged community residences. The storage project may be standalone or paired with a new or existing solar project retrofitted to add a new energy storage system. Systems may be installed in or at new or existing residences or buildings. To be eligible for this incentive, a project must meet all eligibility requirements of the Residential MWh Block incentive program, as well as additional eligibility criteria proposed below.

3.3.1 Residential ISI Project Eligibility

To be eligible for the Residential ISI, projects must meet all eligibility requirements of the Residential MWh Block incentive program and meet one of the following criteria:

- Be located within a Disadvantaged Community census tract as identified by the Climate Justice Working Group;
- Service the owner-occupied residence with household income less than 80% of the Area Median Income (AMI) or 80% of the State Median Income (SMI), whichever is higher; or
- Service a residential (1-4 unit) affordable housing property

3.3.2 Residential ISI Verification Requirements

In order for a residence to qualify for the Inclusive Storage Incentive, it must demonstrate one of the following eligibility requirements:

Project Geo-eligibility demonstrated by:

- A project's location in a Disadvantaged Community census tract [as defined by the Climate Justice Working Group](#).
- A project's location in an *EmPower New York pre-screened area*
 - a. The map which shows the pre-screened areas can be found at <https://www.nyserdera.ny.gov/empower>
- Location will be automatically verified by NYSERDA's application system based on project address.

Individual household eligibility established by the customer by completing the NYSERDA Income Eligibility Application found at https://portal.nyserdera.ny.gov/IEV_APPINTAKE_OnePageApplication_Page

Residential (1-4 unit) affordable housing eligibility demonstrated by documented participation in one of the assistance programs listed in the table below.

EmPower New York Award Letter	dated within 12 months of the customer agreement signature
HEAP Award Letter	dated within 12 months of the customer agreement signature
HEAP or Energy Utility Assistance listed on the utility bill	Utility bill must be within the past 12 months of the customer agreement signature
SNAP Award Letter	dated within 12 months of the customer agreement signature
TANF Award Letter	dated within 12 months of the customer agreement signature
Supplemental Social Security Income Award Letter	dated within 12 months of the customer agreement signature

3.3.3 Capacity Allocation

The Residential program will allocate 80 MW (40 percent of total Residential storage program capacity of 200 MW authorized by the 2024 Storage Order) towards the Residential ISI.

3.3.4 Incentive Block Sizes and Rates

NYSERDA will allocate capacity of 10 MW/25 MWh at an incentive rate of **\$450/kWh** to the first block of the Residential ISI. Capacity allocations and incentive rates for future Residential ISI blocks will be determined based on analysis of prevailing market conditions, uptake trends, and stakeholder feedback.

4. Stakeholder Feedback Submission Process

Please read the draft program rules pertaining to the Residential and Retail ISI in this document; for orientation purposes, a high-level overview of program background, key considerations, and design drivers in slide deck format is available [here](#). For reference, the current version of Program Manual that describes program design and rules for all projects is available [here](#).

Please see *Questions for Stakeholder Feedback* and provide your feedback on the following key components of the Inclusive Storage Incentive (ISI):

Retail ISI

- Critical Facility Inclusion Criteria

- Proposed List of Critical Facilities
- Verification Requirements

Residential ISI

- Additional eligibility pathways

While stakeholders are encouraged to respond to the specific questions listed in Section 5, feedback on other program aspects will also be considered. Please reference any specific experiences, examples, or data that support your responses. Stakeholder feedback will not be treated as confidential information and may be disclosed and discussed publicly.

Feedback and responses must be sent to energystorage@nyserda.ny.gov with the subject line “ISI RFI Feedback: Organization Name”. Failure to use this subject line may result in NYSERDA not receiving your response. Upon receipt, NYSERDA may request further details or a call/meeting to discuss the respondent’s submission. Feedback and responses are requested by June 3, 2025.

For any questions, please contact energystorage@nyserda.ny.gov.

Disclaimer

The information gathered by NYSERDA will be advisory only and is not binding on any state agency, office, commission, or public authority. Any actions recommended by NYSERDA will be subject to all applicable laws, including procedural, regulatory, and environmental review requirements. This RFI is neither a contract offer nor a request for proposals and does not commit NYSERDA to award a contract, pay any costs incurred in preparing a response, or to procure or contract for services or supplies.

Respondents are encouraged to respond to this RFI; however, failure to submit a response will not impact a Respondent’s ability to respond to any future competitive solicitation process (if any) for projects, or influence the selection of a service provider going forward or affect its rights and obligations under any applicable laws or in any legal proceeding. NYSERDA reserves the right to discontinue or modify the RFI process at any time, and makes no commitments, implied or otherwise, that this process will result in a business transaction or negotiation with one or more Respondents.

All costs associated with responding to this RFI will be solely at Respondents’ expense.

5. Questions for Stakeholder Feedback

A. Retail ISI: Critical Facilities List

A1. Are there critical facility types that should be added to or removed from the proposed list?

In order to minimize NYSERDA programmatic discretion in application review, it is recommended that any suggested additional critical facilities meet the following criteria:

- Included in a relevant existing federal, state, or utility-level framework (E.g. FEMA Public Assistance Program and Policy Guide)
- Facility eligibility should be verifiable by NYSERDA

B. Retail ISI: Critical Facility Inclusion Criteria

B1. Are there additional ways to make facility categories and definitions clear and implementable and minimize programmatic discretion in application review?

C. Retail ISI: Verification Documentation Requirements

C1. What additional or alternative documentation could be required to verify facility eligibility?

C2. Are the proposed documentation requirements rigorous, valid, reasonable and obtainable for different facility types?

C3. Are there other types of documentation that should be considered as acceptable proof of facility type/operation, proof of active operation, list of services, proof of population served, or other?

C4. Should documentation requirements vary by facility type? If so, how?

C5. What processes could help streamline documentation submission while ensuring program integrity?

D. Residential ISI: Additional Eligibility Pathways

D1. Should customers that **do not** meet any of the Residential ISI eligibility pathways listed in Section 3.3.1 be eligible for the Residential ISI through the below pathways?

- They have a serious illness or condition that could become life-threatening if electricity is disconnected; or
- Have experienced frequent power outages over a historical period.

E. Residential ISI: Tiered Rate

E1. Should there be a higher Residential ISI rate for customers that **do** meet the Residential ISI eligibility pathways listed in Section 3.3.1 and meet either of the additional below criteria?

- They have a serious illness or condition that could become life-threatening if electricity is disconnected; or
- Have experienced frequent power outages over a historical period.