



June 16, 2022

Eric Hsieh
Director, Grid Systems and Components
Office of Electricity
U.S. Department of Energy
1000 Independence Avenue, SW
Washington, DC 20585

RE: Request for Information (RFI) on the Long Duration Energy Storage for Everyone, Everywhere (LD ESEE) Initiative

Dear Director Hsieh,

The National Association of State Energy Officials (NASEO) appreciates the opportunity to submit comments in response to the U.S. Department of Energy's (DOE) Request for Information (RFI) on the Long Duration Energy Storage for Everyone, Everywhere (LD ESEE) Initiative in accordance with the Infrastructure Investment and Jobs Act (IIJA). NASEO represents the governor-designated State Energy Directors and their offices from each of the 56 states, territories, and the District of Columbia.

In response to the RFI, NASEO encourages DOE to consider the following for the Energy Storage Pilot Grant Program (Category 1C):

1. Integrate Program with Relevant State Energy Policy Goals and Planning Efforts

NASEO supports DOE's goals with the Energy Storage Pilot Grant Program to build enduring capabilities (institutional, analytical, financial) for targeted communities to invest in storage resources that provide local benefits (including resilience, decarbonization, and economics). To achieve these objectives, NASEO encourages DOE to require non-state applicants to coordinate with State Energy Offices and to demonstrate how the proposed project integrates with state energy goals and other state programs and projects aimed at achieving similar objectives.

State Energy Offices, one of the entities eligible to apply for opportunities under the program, lead the development of energy planning and policy in most states. State Energy Offices support their governors' advancement or practical energy policies, complete comprehensive state energy plans

1300 North 17th Street
Suite 1275
Arlington, Virginia 22209
Telephone: 703.299.8800
www.naseo.org

BOARD OF DIRECTORS

Chair
KELLEY SMITH BURK
Florida

Vice Chair
JOHN WILLIAMS
New York

Treasurer
MOLLY CRIPPS
Tennessee

Secretary
WILL TOOR
Colorado

Past Chair
ANDREW MCALLISTER
California

Parliamentarian
JASON LANGLIOS
Louisiana

Regional Representatives

DAN BURGESS
Maine

PATRICK WOODCOCK
Massachusetts

DAVE ALTHOFF
Pennsylvania

MARY BETH TUNG
Maryland

MITCHELL SIMPSON
Arkansas

MICHELLE GRANSEE
Minnesota

CHAD KRUSE
Illinois

MICHAEL FURZE
Washington

EDDY TREVINO
Texas

DAN LLOYD
Montana

Affiliates' Co-Chairs
ANNE SMART
ChargePoint

HEATHER REAMS
Citizens for Responsible Energy Solutions

Executive Director
DAVID TERRY

General Counsel
JEFFREY C. GENZER

covering every energy production, distribution, and end-use sector, inform regulatory processes, engage with unregulated utilities and other energy providers on reliability and resilience issues, and support grid-related energy technology research, demonstration, and deployment investments. In partnership with the private sector, the State Energy Offices accelerate energy-related economic development and support meeting state energy affordability, reliability and climate goals through energy solutions that address their citizens' needs and enhance physical and cyber energy security. In doing so, State Energy Offices are part of long-term state energy planning, which often encompasses considerations of resilience and reliability, workforce development, clean energy and environmental goals, and stakeholder and community engagement. In particular, State Energy Offices lead the development of State Energy Plans and in most states develop and implement the State Energy Security Plans (SESP), which include risk assessments and risk mitigation strategies. Many states have also undertaken more-specific studies on energy storage, for example Maine, Pennsylvania, and Virginia. These include state-specific considerations of markets, state energy storage goals if applicable, and barriers to increasing energy storage. Requiring alignment with existing state energy, resilience and storage plans and programs would amplify opportunities for the DOE-funded projects to achieve the Energy Storage Pilot Grant Program's objectives. NASEO therefore encourages DOE to integrate that coordinating function into the Energy Storage Pilot Grant Program.

2. Coordinate Existing and New Funding Opportunities and Structures at the State Level

To support state energy policy goals, State Energy Offices and other state agencies have developed and implemented a variety of programs, ranging from support to EV charging infrastructure to cybersecurity considerations, grid-interactive, efficient buildings, and microgrid grant funding. For example, several states such as California, Hawaii, Wisconsin, Connecticut, Maryland, Kentucky, and New Jersey have robust microgrid programs to support the development and funding of microgrid projects, many of which include energy storage considerations. NASEO encourages DOE to consider how existing state programs (either established or newly developed through the IIJA) can be leveraged and coordinated with the proposed Energy Storage Pilot Grant Program. This could also enhance the trajectory for some of the proposed storage solutions under the Energy Storage Pilot Grant Programs to move beyond the pilot stage.

We appreciate the opportunity to provide comments on this important issue. We look forward to continuing our partnership with DOE in supporting states on enhancing grid resilience and implementing the IIJA.

Best regards,

A handwritten signature in black ink, appearing to read 'DTerry', with a stylized flourish at the end.

David Terry
Executive Director, NASEO