

New York City Department of Buildings
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To Whom It May Concern,

Thank you for the opportunity to submit comments on the new rule regarding Property Tax Abatement Application for the Installation of Electric Energy Storage Equipment.

Solar One has several comments regarding the proposed rule changes below:

- Does the \$250K cap apply to a building or a project application?
- Technical requirements should be removed from the rule amendment as project requirements are already dictated by the city building and construction codes.
- As it relates to “**(e)(1)(ii) and (f)(1)(ii) - eligible expenditures** Work unrelated to the property tax abatement shall not be included in the alteration application”, DOB should clarify how solar plus storage projects should apply to get the PTA, as work related to solar and storage projects sometimes requires separate alteration applications. How can those otherwise eligible expenditures be included as part of PTA costs if they are part of a different filing?
- Can the storage PTA be claimed for a site that has previously taken advantage of the solar PTA if storage is being added later?
- In addition to clarification on how solar and energy storage projects can take advantage of New York City’s property tax abatement, the energy storage industry would also benefit immensely from a DOB bulletin clarifying the energy storage permitting process both to open up the energy storage market in New York City, as well as help the city and the state meet its ambitious energy storage deployment targets.

Sincerely,

Angelica Ramdhari



Director, Resilient Solar