



230 West Street, Suite 150, Columbus, Ohio 43215  
www.armadapower.com

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New Jersey Board of Public Utilities  
44 South Clinton Avenue, 9<sup>th</sup> Floor  
Post Office Box 350  
Trenton, New Jersey 08625  
Attn: Secretary Sherri L. Golden  
*Submitted Electronically to Docket No. QO22080540*

**Re: In the matter of the New Jersey Energy Storage Incentive Program,  
BPU Docket No. QO22080540**

Dear Secretary Golden:

Armada Power, LLC (“Armada Power”) appreciates this opportunity to submit comments in response to the New Jersey Board of Public Utilities’ (“Board” “BPU”) Request for Information (“RFI”) regarding the Board Staff’s New Jersey Storage Incentive Program (“NJSIP”) Straw Proposal. Armada Power believes the NJSIP Straw Proposal is a great step toward the state of New Jersey achieving 2,000 MW of storage by 2030.

Armada Power is a U.S.-based company that develops and manufactures control devices to be installed on any electric resistance water heater for thermal storage. These devices, manufactured in the United States, provide 1.6 kW of storage per device, with negligible comfort impacts. Utilizing the thermal storage benefits of water heaters, Armada Power is able to aggregate residential water heaters to respond to the needs of the grid in a measurable manner. Armada Power is able to provide grid services such as demand response, frequency regulation and participate in capacity markets by aggregating fleets residential water heaters and managing their charging. Armada’s Power response regarding thermal storage incentives from the RFI as follows:

**Q. 3.11 How should incentives be structured for thermal storage systems?**

Thermal storage systems, while not always dispatchable in the way a battery storage system may be, can still be important and beneficial part of any storage system program. The Federal Energy Regulatory Commission (“FERC”) in Order 2222 recognizes thermal storage as valuable DER technology. Thermal storage technologies are able provide voltage control, frequency regulation, renewables firming and participate in capacity markets. These are services are critical to

maintaining the reliability and resilience of a growing electric grid, particularly when integrating renewables on to the grid. Armada Power utilizes the thermal storage properties of water heaters to provide crucial grid services and help protect other assets such as batteries for when the grid really needs to be injected with energy. Thermal storage should be incentivized as any other storage system in the NJSIP, particularly the performance incentives such as peak demand management.

Respectfully submitted,

/s/ Kathleen McManus

Kathleen McManus

Specialist, Government and Regulatory Affairs

Armada Power 230 West Street

Suite 150 Columbus, OH 43215

(614) 918-2011

[kmcmanus@armadapower.com](mailto:kmcmanus@armadapower.com)