

Eversource MA DOER Energy Storage Target Annual Report - 2026
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I. Introduction

Massachusetts law set a statewide target for 1,000 megawatt hours (“MWh”) of energy storage systems (“ESS”) to be installed by December 31, 2025.

Eversource is strongly committed to serving as a clean energy catalyst for the region and views energy storage as a core component of the clean energy transformation required to achieve the Commonwealth’s goal of net-zero greenhouse gas emissions by 2050.

As of December 31, 2025, Eversource had approximately 6,751MWh_{ac} and 1,832 MW_{ac} of ESS either installed ESS or in the pipeline on the distribution system in its service territory.¹ Eversource’s total installed amount of ESS in the distribution system as of the end of 2025 increased from 134 MWh_{ac} to 158 MWh_{ac} and 80 MW_{ac} to 93MW_{ac} from the end of 2024 reported figures, due to projects that were able to be completed during the year. Eversource’s pipeline ESS in the distribution system increased from 4,412 MWh_{ac} and 1,164 MW_{ac} at the end of 2024 to 6,593 MWh_{ac} and 1,739 MW_{ac} at the end of 2025, representing significant ESS growth under development in Eversource’s service territory. These figures are based on customer-reported data with adjustments for identified discrepancies for certain customers, as detailed in Section II.E.

Eversource outlined its five-and ten-year planning solutions in its Electric Sector Modernization Plan (“ESMP”)² which includes the construction of two ESS in 1) Hyde Park, Boston (15 MW/20 MWh), and 2) Industrial Park in New Bedford (5 MW/10 MWh) to resolve capacity and power quality needs.³ The Hyde Park project’s conceptual design has been completed. The Company expects to award the ESS System vendor in Q2-2026 and continues preliminary engineering and outreach to stakeholders. The Industrial Park project in New Bedford is currently under review by the Massachusetts Department of Public Utilities (DPU) in D.P.U. 25-81.

¹ This increase from 2021 to 2022 was the result of multiple large standalone energy storage systems filing interconnection applications in 2022 and can be found in the list of pipeline projects.

² For additional information, please refer to D.P.U 24-10, located here:
<https://www.mass.gov/info-details/background-and-procedural-requirements-on-electric-sector-modernization-plans>

³ For additional information, please refer to pages 112 and 402 of Eversource’s ESMP located here:
<https://fileservice.eea.comacloud.net/FileService.Api/file/FileRoom/18550443>

Eversource currently has seven ESS projects with executed interconnection agreements, totaling approximately 1,320 MW of generation capacity connecting to the Eversource transmission system across Massachusetts. In addition, there are two projects in Eversource's Eastern Massachusetts service area that entered service last year (2025). Specifically, the Medway Grid (500 MWh_{ac} and 250 MW_{ac}) and Carver Battery Storage (300 MWh_{ac} and 150 MW_{ac}), which required roughly \$35 million in transmission investment by Eversource and delivered the first 400 MW of transmission-scale ESS capacity onto the local transmission system. Today, there are seven ESS projects under study by ISO-NE, participating in the Transitional Cluster Study, representing a total of 2,245 MW and seeking to interconnect to the Eversource Transmission System in Massachusetts. ISO-NE studies are expected to be completed in the Fall of 2026.

Additionally, on October 31, 2023, the electric distribution companies filed Operational Parameters for Energy Storage Tariffs with proposed rates pursuant to Section 72 of Chapter 179 of the Acts of 2022, *An Act Driving Clean Energy and Offshore Wind*. The Department docketed this matter for Eversource as D.P.U. 23-126.⁴ As of the date of filing this report, this proceeding is ongoing.

What follows is Eversource's detailed Energy Storage Target Annual Report ("Report") to the Massachusetts Department of Energy Resources ("DOER") for the year ended December 31, 2025.

II. Reporting Requirements

An Act to Advance Clean Energy, Section 20 of Chapter 227 of the Acts of 2018, amended *An Act Relative to Energy Diversity*, Section 15 of Chapter 188 of the Acts of 2016, by striking out Section 15 in its entirety and replacing it with a new Section 15 containing a new statewide energy storage target of 1,000 MWh, to be achieved by December 31, 2025, and a requirement for the electric distribution companies ("EDCs") to report annually to the DOER on the new target by February 15, beginning in 2019, documenting the energy storage installations in their respective service territories.

As set forth in *An Act to Advance Clean Energy*, to achieve this statewide energy storage target of 1,000 MWh, the DOER "may consider a variety of policies to encourage the cost-effective deployment of energy storage systems, including the refinement of existing procurement methods to value energy storage systems properly, inclusion in energy portfolio standards, the use of alternative compliance payments to develop pilot programs and the use of energy

⁴ Eversource's testimony in D.P.U. 23-126 can be found at the following link:
<https://fileservice.eea.comacloud.net/FileService.Api/file/FileRoom/18159721>

efficiency funds under section 19 of chapter 25 of the General Laws if the department determines that the energy storage system installed at a customer's premises provides sustainable peak load reductions on either the electric or gas distribution systems and is otherwise consistent with section 11G of chapter 25A of the General Laws.” This is Eversource's ninth annual Report to the DOER and covers the period January 1, 2025 through December 31, 2025.

A. Data Collection

Eversource obtains uniform data and information for EDC-owned and non-EDC owned- ESS projects through the distributed generation (“DG”) interconnection process. For purposes of annual Reports to the DOER, the EDCs have been requesting data and information for ESS projects they do not own from customers and developers of existing ESS projects already connected to their electric distribution systems and are requesting such data and information from customers and developers of new projects that have applied to interconnect to their respective electric distribution systems. As of December 3, 2019, the DPU issued an Interim Guidance regarding ESS requiring all interconnection applications that include ESS to submit a completed ESS Questionnaire to provide technical and operational data about the proposed ESS.⁵ Proposed revisions to the EDCs' distributed generation interconnection tariffs would incorporate these ESS data requests into the interconnection application process. The collected data and information will be used to demonstrate measurable progress towards the achievement of the ESS 1,000 MWh target of installed ESS. The data and information include:

- ESS Installed, that is, Interconnected (MWh_{ac} and MW_{ac});
- ESS in the Pipeline to be installed (MWh_{ac} and MW_{ac});
- Policy Sources of ESS (e.g., Solar Massachusetts Renewable Target (“SMART”) program);
- ESS Specifications (e.g., technology type, manufacturer);
- Operational Information (e.g., installation type, system configuration); and
- Applications/ Intended Use Cases (e.g., Peak Shaving/ Load Leveling).⁶

The EDCs are including the above-mentioned data and information on the ESS installed and pipeline projects in their annual reports to the DOER, to the extent such data and information have been provided to them. However, for non-EDC-owned projects, such data and information must be obtained from customers and developers. Beginning in 2020, the consistency of data

⁵ See DG Interconnection, D.P.U. 19-55, Interim Guidance – Energy Storage Systems (December 3, 2019).

⁶ *State of Charge* report, issued on September 16, 2017. According to the report, a use case is defined as an integrated set of grid services performed by a technology at a distinct site or location on the grid. <http://www.mass.gov/eea/docs/doer/state-of-charge-report.pdf>.

collection and reporting has improved with the requirement for applicants to provide a completed ESS Questionnaire. Eversource receives the completed ESS Questionnaire from all applicants with an ESS project. However, some information in the ESS Questionnaire may be incomplete and the Company does not perform detailed confirmation of the information. The ESS Questionnaire is the source of the information in this report.

B. Attachment A

Attachment A to this Report includes installed ESS projects, and ESS projects in the pipeline as of **December 31, 2025**. For purposes of this Report, an “installed” ESS project means an ESS project that has been interconnected to an EDC’s electric distribution system.

C. Policies Sources of ESS

The EDCs have jointly identified several state policies, programs, and funding sources intended to drive the installation of ESS in the Commonwealth. Where the EDCs are aware of the state policy, program or funding source associated with an ESS project, the EDCs have identified that policy source in Attachment A. Some ESS projects may participate in multiple state policies, programs, and funding sources. Policy sources of ESS projects include, but are not limited to:

- Utility-owned ESS for transmission and distribution (“T&D”) operation and management for the benefit of customers (“Utility-Owned T&D”);
- Utility-owned ESS for research and development purposes, such as those projects supported by U.S. Department of Energy grants, or utility-scale solar plus storage projects developed to support research and development (“R&D”) programs (“Utility-Owned R&D”);
- ESS to be paired with large-scale offshore wind proposals for consideration under Section 83C of the Green Communities Act (“Section 83C”), which requires solicitations for the procurement of up to 5,600 MW of offshore wind capacity;
- Customer-owned ESS enrolled in a Program Administrators’ energy efficiency/demand response demonstration project or program (“Energy Efficiency/DR program”);
- Customer-owned ESS enrolled in the EDC’s SMART program that qualify for the SMART storage adder (“SMART program”);
- Customer-owned ESS funded by the DOER’s or Massachusetts Clean Energy Center’s (“MassCEC”) Advancing Commonwealth Energy Storage (“ACES”) and Peak Demand

Reduction Grant programs, which include projects to which the EDC has provided in-kind and/or financial support (“DOER/ MassCEC Funded Projects”);⁷

- Customer-owned ESS enrolled in the Clean Peak Energy Portfolio Standard (“Clean Peak Standard” or “CPS”) program under section 225 CMR 21.00 promulgated pursuant to M.G.L. c. 25A, § 17(c);
- Utility-owned solar and storage authorized under M.G.L. c. 164 § 1A(g) to assist a municipality at high risk from the effects of climate change in furthering its climate adaptation and resiliency goals by constructing, owning, and operating solar generation facilities paired, where feasible, with energy storage facilities. (“Utility-Owned Climate Act”);
- EDCs and municipal aggregators with certified energy efficiency plans may submit whole building efficiency offerings that promote the adoption of and installation of onsite renewable energy generation and energy storage to assist low- and moderate-income customer groups. See Chapter 179, Section 87A of the Acts of 2022;
- The EDCs, in coordination with the Department of Energy Resources, are directed to jointly and competitively solicit proposals for ESS and enter cost-effective long-term contracts equal to, in the aggregate, approximately 5,000 megawatts of ESS no later than July 31, 2030. See c.169, Section 83E of the Acts of 2016; and
- On July 30, 2025, the Department issued D.P.U. 25-59 approving the proposed timetable and method for solicitation and execution of long-term contracts for energy storage systems, pursuant to Section 83E of *An Act Relative to Green Communities*, St. 2008, c. 169, as amended by St. 2024, c. 239, § 98. On July 31, 2025, the Request for Proposals was issued. The DOER has made its selection, and the EDCs are in the process of negotiating contracts.

D. Applications and Intended Use Cases

Based on the *State of Charge* report and the EDCs’ own expertise, the EDCs have identified the following primary applications and use cases for ESS. This list may be modified as the EDCs monitor relevant industry trends and gain further hands-on experience with energy storage.

- i. Wholesale Market (i.e., Energy, Capacity, Ancillary Services): ESS have the potential to participate in all major categories of the wholesale market.
 - a. In the wholesale energy market, ESS may be able to produce revenue by arbitraging hourly electricity prices, charging when the wholesale price is low and discharging when the wholesale price is high.

⁷ Any ACES or Peak Demand Reduction Grant project where the EDC is the award recipient or the EDC partner on the project.

- b. ESS may participate in the ISO-NE Forward Capacity Auction (“FCA”) and earn revenue by contributing to ISO-NE’s installed capacity.
 - c. ESS may also be able to generate revenue by participating in the ancillary services market (e.g., operating reserves and frequency regulation).
- ii. Peak Shaving / Load Leveling: ESS can store energy during hours of low demand and discharge energy when the system is peaking. This may reduce the entire system peak and result in lower utilization of inefficient and expensive gas and oil units. It can also reduce ISO-NE capacity and regional network service costs.
- iii. Generation Support (e.g., Peaker Replacement): ESS can discharge when the system is peaking, thus acting in place of peaking capacity. ESS has the potential to be cleaner and more reliable than a traditional combustion turbine unit.
- iv. T&D Asset Alternative: Strategic deployment of ESS has the potential to defer or eliminate traditional transmission and distribution upgrades in specific locations. The potential for transmission and distribution deferrals needs to be studied on an individual basis in consideration of local circumstances and system characteristics.
- v. Power Quality (e.g., Voltage/VAR Support): ESS can provide voltage/VAR support and may possibly receive compensation through the ISO-NE Open Access Transmission Tariff (“OATT”) for doing so (subject to meeting certain eligibility requirements). Reactive power cannot be efficiently transmitted over long distances, which makes distributed ESS an attractive alternative to traditional voltage/VAR support supplied by generating units in some locations.
- vi. Customer Bill Savings (e.g., Demand Charge Management): Individual customers can utilize ESS to shave the peaks and fill the troughs of their load. By reducing peak load, customers may be able to mitigate their installed capacity tag. Commercial and industrial customers may also have the potential to realize bill savings by lowering their peak demand and avoiding a demand charge. Customers with time varying rates can also use ESS to perform arbitrage by charging the ESS during less expensive off-peak times and discharging for their own use during more expensive peak periods.
- vii. Renewable Energy Integration (e.g., Ramping, Smoothing): ESS can quickly follow the variable generation of renewable resources making it smooth and

dispatchable. ESS can thus support the further integration of renewable resources.

- viii. Renewable Energy Shifting: ESS have the potential to store energy generated by renewable resources when system demand is low and discharge when system demand is high.
- ix. Reliability and Resiliency: ESS can support reliability and resiliency by locally providing energy during an outage event.
- x. Microgrid: ESS can help promote a cost-effective and reliable microgrid. By storing energy produced by renewable resources or by combined heat and power (“CHP”) for use when those assets are not generating, ESS can support microgrid “islanding” and going off the main grid at times when there is an electric distribution system outage or when it would be otherwise advantageous to the microgrid operator.
- xi. Black Start: Some eligible ESS may be able to provide black start capability and if counted by ISO-NE for system restoration purposes, be compensated.

E. Target Results

See Attachment A for data and information regarding installed (e.g., interconnected) ESS projects and ESS projects in the pipeline to be installed.

i. Installed Projects

As of December 31, 2025, Eversource’s total installed amount of storage in Massachusetts was 158 MWh_{ac} and 93 MW_{ac} to its distribution system.

In addition, in 2025, two ESS were installed that operate as transmission assets in Eastern Massachusetts: the Medway Grid⁸ (500 MWh_{ac} and 250 MW_{ac}) and the Carver Battery Storage (300 MWh_{ac} and 150 MW_{ac})⁹. Adding this capacity to the distribution-connected capacity in

⁸ For more information on the Medway Grid project: <https://www.mass.gov/info-details/medway-grid-battery-project>

⁹ For more information on the Carver project: <https://www.mass.gov/info-details/cranberry-point-energy-storage>

Attachment A results in a total of approximately 958 MWh_{ac} and 493 MW_{ac} to the MA electric system.

ii. Pipeline Projects

As of December 31, 2025, Eversource had approximately 6,593 MWh_{ac} with a capacity of 1,739 MW_{ac}.¹⁰ connected to the distribution system.

As noted above, these figures are based on customer-submitted data for which the Company does not perform detailed confirmation. The values above reflect the data shown in Attachment A. In compiling the data for this report, the Company noted several areas of discrepancy in customer-submitted data that may inform alternate estimation of kWh totals:

- The Company noted that several customer facilities installed and in pipelines feature energy (kWh) values that appear as significant outliers. The Company infers that in these cases customers may have reported Watt-hour values in the kWh field.
- The Company identified instances across all years of installed and pipeline data in which facilities reporting as AC-Coupled provided values of zero in the "Energy kWh (AC) field," but reported kWh values in the "Energy kWh (DC)" field. The same issue is observed for DC-Coupled customers reporting zero values in the DC kWh field. As a best approximation, the company infers that these customers' non-zero kWh should be counted in the field aligned with their coupling type.
- The Company noted that several customers, in both installed and pipeline data, entered a Capacity (kW) value without corresponding energy (kWh) figures. To correct the figures for reporting, a factor (of two hours) was applied to the listed Capacity values to illustrate a reasonable Energy estimate.
- Adjusted values are highlighted in orange in Attachment A.

¹⁰ The exact amounts of energy and power of the proposed projects in AC ratings could not be confirmed at the time of Report submittal, but will be known as the projects move from the pipeline to the installed list.

F. Cost-Effectiveness and Viability

Energy Efficiency/ Demand Response

In Massachusetts, the energy efficiency program administrators (“PAs”) use a Total Resource Cost (“TRC”) test to determine the cost-effectiveness of an offering, initiative, or program. The PAs assess the total cost of the project and compare that against the total benefits of the project and determine if the benefits exceed the costs.

Beginning in the 2019-2021 Three Year Energy Efficiency Plan, the PAs proposed two pathways for incentivizing customer-owned and sited behind-the-meter storage assets through their Active Demand Response offerings (often referred to publicly as “ConnectedSolutions”). The first is focused on residential-scale battery installations and utilizes a direct load control approach to automatically dispatch the battery via the system’s inverter, connected through the PA’s Energy Hub. The second is via the Daily Dispatch offering, an approach in which curtailment service providers (“CSPs”) work with large customers to develop project-specific dispatch strategies.

Both offers have a “pay for performance” incentive structure in which customers are paid based on the actual curtailment delivered during event windows. Because the costs of battery systems are currently too high and the PAs are unable to cost-effectively offer incentives for batteries, the PAs have instead incentivized the dispatch and performance of equipment already installed at a customer’s home or business. Therefore, when assessing the cost-effectiveness of these storage offerings, the PAs look only at the incentive amounts they are proposing to offer and compare these against the value of the system benefits from the expected reduction in capacity.

In the 2019-2021 Three Year Plan order, the DPU did not initially approve the full-scale statewide deployment of battery dispatch because it was determined to be an untested form of dispatch but did support learning more through demonstration. The PAs evaluated demonstrations in which they dispatched batteries in both residential and commercial applications in summer 2019 and presented^{11 12} those findings to the Massachusetts Energy Efficiency Advisory Council (“EEAC”), secured an EEAC resolution in support of the inclusion of batteries as a full program offering, and submitted a compliance filing (D.P.U. 20-33 through D.P.U. 20-36 to the DPU in Q1 2020). The DPU approved the inclusion of the batteries program offering on July 28, 2020.

¹¹ Residential Energy Storage Demand Response Demonstration Evaluation: https://ma-eeac.org/wp-content/uploads/MA19DR02-E-Storage_Res-Storage-Summer-Eval_wInfographic_2020-02-10-final.pdf

¹² C&I Daily Dispatch Battery – Post-Summer 2019 Report

In the 2022-2024 Three Year Plan order, issued on January 31, 2022, the DPU approved the PAs' proposal to continue offering incentives for the dispatch of batteries, in both residential and commercial installations.

In the 2025-2027 Three Year Plan proposal, the PAs again proposed to continue offering incentives for the dispatch of batteries, and the DPU approved this continued offering on February 28, 2025.

Clean Peak Standard

In Massachusetts, the Clean Peak Standard has been designed to provide incentives to clean energy technologies that can supply electricity or reduce system demand during seasonal peak demand periods. Energy storage systems are well-positioned to generate Clean Peak Energy Certificates ("CPECs") under the program and proceeds from the sale of these certificates are anticipated to comprise a significant portion of ESS revenue streams.

While the CPS has been a significant factor in incentivizing large quantities of ESS to seek interconnection at the distribution level, the program has experienced an undersupply of certificates compared to the annual minimum standard established in initial regulations. In response to the undersupplied market, DOER opened a programmatic review of the CPS in 2024, which resulted in the filing of a series of emergency rulemakings that make changes to 225 CMR 21.00. In emergency regulations filed in July 2024, DOER revised the minimum standard from 2024 through 2050, reducing the minimum standard initially, but substantially increasing it in later years, and created a 2x near-term resource multiplier for standalone ESS systems that begin operations prior to January 1, 2027.

In later emergency regulations filed in October 2024, DOER revised the alternative compliance payment ("ACP") rate, substantially increasing the rate from \$45 to \$65 in program years 2026 through 2032. DOER also made changes to provisions regarding CPEC procurements in this rulemaking; the emergency regulations remove the initial 30% procurement target and market supply mechanism by which DOER may increase subsequent procurement targets. DOER notes that these changes were made in response to stakeholder comments expressing an urgent need for changes to the ACP rate and CPEC procurement to enable a large portfolio of ESS projects to move forward toward deployment and commercial operation.

G. Market Barriers and Solutions to Market Participation of Energy Storage

FERC Order 2222

On September 17, 2020 the Federal Energy Regulatory Commission ("FERC") issued Order No. 2222 requiring that all Regional Transmission Organizations or Independent System Operators

establish participation models for distributed energy resource aggregations in wholesale markets so those resources are allowed to provide and receive compensation for all market services for which they are technically capable.¹³ The Order includes a diverse list of distribution system-sited technologies that fall under the distributed energy resources umbrella, including both behind-the-meter and front of the meter ESS.¹⁴ ISO-NE led a stakeholder engagement process, of which the Massachusetts EDCs were active participants, through the New England Power Pool (“NEPOOL”) Markets Committee and other channels to develop a compliance proposal for submission to FERC. ISO-NE filed its compliance proposal with FERC on February 2, 2022, which included a proposed implementation date of Q4 2026 (the “Compliance Proposal”). On March 1, 2023, FERC issued a Compliance order accepting in part and rejecting in part, subject to further compliance, the Compliance Proposal. The Compliance Order directed further compliance filings within 30, 60 and 180 days of the order. On November 2, 2023, FERC issued an Order on ISO-NE’s May 9, 2023 compliance filing that required a further compliance filing and Tariff amendments to be filed by January 31, 2024 to address the provision of meter data between DER Aggregators, Host Utilities and ISO-NE. On April 11th, 2024, FERC issued a Compliance Order accepting ISO-NE’s January 31, 2024 compliance filing, subject to a further compliance filing. On September 5, 2024, and November 11, 2024, FERC accepted ISO-NE’s further compliance filings with an effective date of November 1, 2026. ISO-NE’s tariff filings define Distributed Energy Resources (“DER”) as ‘...any resource connected to the distribution system, parts of it, or on the customer’s side of the meter.’ Therefore, ESS participation under DER Aggregations (“DERAs”) in wholesale markets are anticipated to be possible starting November 1, 2026.

Inability to Propose an ESS as a Transmission Solution to a Stated Transmission Need

On December 29, 2022, ISO-NE filed proposed revisions to the ISO-NE Tariff and Transmission Operating Agreement (“TOA”) with FERC to incorporate rules that will enable electric storage facilities to be planned and operated as transmission-only assets to address system needs identified in the regional system planning process. The Storage-As-a-Transmission-Only-Asset (“SATO”) category created by this proposal applies to electric storage equipment that:

- (1) is connected to or to be connected to Pool Transmission Facilities in the New England Transmission System at a voltage level of 115 kV or higher.
- (2) is included (with ISO approval) in the Regional System Plan and RSP Project List as a regulated transmission solution and Pool Transmission Facility pursuant to the regional system planning processes in OATT Attachment K.

¹³ FERC Order No. 2222 at 130. https://www.ferc.gov/sites/default/files/2020-09/E-1_0.pdf

¹⁴ *Id.* at, 114.

(3) is capable of receiving energy only from the Pool Transmission Facilities and storing the energy for later injection to the Pool Transmission Facilities.

The proposal also included several restrictions to minimize operational complexities and potential impacts of SATOAs on the ISO-NE wholesale energy market, including limiting energy storage to address a system need that is the result of a second contingency (N-1-1) and limiting the size to less than 30 MW per substation and 300 MW across the ISO NE system.

On October 19, 2023, FERC issued an order accepting ISO-NE's proposed SATOA Revisions without modification. FERC directed ISO-NE to provide notification 30 days prior to the date the Tariff revisions are implemented. As of the date of this filing, ISONE has not yet notified FERC, so the effective date remains uncertain.

Dual Participation

Rules that enable ESS to offer multiple types of services, and to participate both in wholesale and retail electricity markets ("dual participation"), have been in place for multiple years. In 2020, FERC conditionally approved several ISO-NE market rule changes filed in compliance with FERC Order 841, which required each RTO/ISO to establish market participation models for ESS. Specifically, FERC required RTOs/ISOs to "account for the physical and operational characteristics of electric storage resources through bidding parameters or other means" and to ensure that ESS resources are "eligible to provide all capacity, energy, and ancillary services that [they are] technically capable of providing."¹⁵

ISO-NE addressed Order 841 requirements primarily through the creation of the Continuous Storage Facility ("CSF"), a participation model that allows ESS resources to participate simultaneously as Generating Assets, Dispatchable Asset-Related Demand ("DARD"), and Alternative Technology Regulation Resources ("ATRRs"). For resources that do not wish to participate as CSFs, ISO-NE market rules also accommodate several other participation models, including combined models such as Settlement-Only Generator ("SOG") and ATRR. Models other than the CSF model may limit an ESS' ability to provide certain products (e.g., reserves), but they may also afford ESS resources additional operational flexibility relative to the CSF model.

A key requirement for FERC Order 841 compliance is the ability for ESS resources to serve both retail and wholesale markets. In its conditional acceptance of ISO-NE's tariff revisions issued in August 2020, FERC accepted ISO-NE's response to FERC's requirement to submit a further compliance filing "to explain how its Tariff allows for electric storage resources to participate in

¹⁵ FERC Order 841, ¶320, available at <https://www.ferc.gov/media/order-no-841>

both wholesale and retail markets.”¹⁶ ISO-NE’s compliance filing, submitted to FERC on February 10, 2020, proposed new tariff language to state that ESS will “not be precluded from providing retail services so long as it is able to fulfill its wholesale Energy Market and Forward Capacity Market obligations including, but not limited to, satisfying meter data reporting requirements and notifying the ISO of any changes to operational capabilities.”¹⁷ ISO-NE’s tariff revisions took effect March 1, 2021.

On September 30, 2024, pursuant to Massachusetts House Bill 5060 and in alignment with the requirements of FERC Order 841, NSTAR filed at FERC a WDT in Docket No. ER24-3154, which was accepted by FERC on November 27, 2024.

DC Coupled Solar Facilities with Storage

To date, solar facility developers have been incentivized to pair their solar capacity with battery storage capacity to take advantage of the Commonwealth’s SMART program storage adder and enhance the operational capabilities of the solar generation asset. Many of these are designed to be a co-located, alternating current “AC” connection, meaning that each component, the solar PV and battery storage system, has its own dedicated inverter(s) and the battery charges from AC-power flowing into its inverter. However, some projects connect the battery storage to the solar PV output behind the inverter as a direct current “DC” connection. Such systems have combined AC output for both resources through a single AC meter.

This type of connection is allowed by the EDCs’ Standards for Interconnection of Distributed Generation, and the DOER’s guidelines for the SMART program. The DOER and industry participants have highlighted that the PV output that is used to charge the ESS directly is not fully compensated under the SMART program, due to roundtrip efficiency losses of the ESS. In addition, the industry has previously noted ISO-NE market participation barriers related to this system configuration.

In early 2020, the EDCs, DOER and industry stakeholders continued discussions about resolving SMART program compensation issues related to DC-coupled storage systems. These discussions resulted in a high-level consensus proposal for resolving this compensation issue that would ensure DC-coupled systems were not disadvantaged in the SMART program. The true-up

¹⁶ FERC Order on ISO-NE Order 841 Compliance Filing, August 4, 2020, available at https://www.iso-ne.com/static-assets/documents/2020/08/er19-0470-004_8-4-20_order_accept_compliance_further_compliance_req_order_841.pdf

¹⁷ Docket No. ER19-470-000, ISO-NE Revisions in Compliance with the Order No. 841 Order on Compliance, at 11 (February 10, 2020), available at https://www.iso-ne.com/static-assets/documents/2020/02/compliance_filing_order_841.pdf

payment process was approved by the Department in its Order on June 4, 2024, in D.P.U. 20-145 into the SMART Tariff.

Similarly, in August 2020, ISO-NE updated Operating Procedure 18 (“OP-18”) to better accommodate market participation by DC-coupled solar and storage systems.¹⁸ The outcome of the OP-18 modification process established metering configurations that allow apportionment between solar and storage assets for market participation purposes. Still, a number of issues around market settlement and participation remain unresolved at the ISO-NE with DC-coupled system owners, as many would like to participate in the (above-mentioned) CSF market product. However, doing so as a single asset, as required, complicates the division of proceeds between the SMART program (as a credit to customers for the solar energy), and the system owners for the storage capabilities.

Finally, on June 20, 2025, the DOER filed emergency regulations changing the structure of the SMART program to an adjustable block model. Under this model, incentives for solar and solar-plus-storage facilities, as well as the total available capacity eligible for incentives, are adjusted annually by the DOER based on assessment of market need. Subsequently, on November 21, 2025, the EDCs filed a tariff that would implement the DOER’s updated SMART program model. This tariff is currently before the DPU for approval. Coupled storage continues to be required for all solar facilities greater than or equal to 1MW. These changes to the SMART program are intended to mitigate identified barriers to solar with storage and allow for more flexible policy support going forward.

¹⁸ https://www.iso-ne.com/static-assets/documents/rules_proceeds/operating/isonet/op18/op18_rto_final.pdf