# General:

The IIRG’s Energy Storage Sub-Group has conducted all work possible on the specific substantive topic described in this submission. This written narrative summarizes the subject substantive topic including a description of group activity on the topic, group recommendations, and requested procedural guidance by the Department, if any.

* 1. There is some consensus on this topic and some disagreement for which the IIRG does not believe it can make any additional progress without Department intervention.

# Definition

In the context of load at an energy storage facility, it is important to delineate between load necessary for the charging of the battery versus station service load which serves other ancillary loads at the facility, not directly related to ESS charging. The distinction is important because it dictates the applicable electric rate and metering arrangement of the facility.

# Group Activity:

The group met for five (5) virtual sessions to discuss the subject topic. The following is a summary of the general discussion topics:

* Discussed ISO perspective on charging load vs station load, including guest attendance by ISO personnel
* Discussed each individual EDC position on the topic
* Discussed various meter arrangement configurations
* Presentations from each EDC including definition of current positions
* Discussed concept of de-minimis load which would have load below a certain threshold, although not charging load, to be allowed to be metered behind the same point as the charging load.

# Member Positions:

The sub-group has progressed discussion on this topic as far as possible with the following positions. Consensus was achieved the extent possible, however certain elements remain non-consensus with differing opinions:

1. **EDC Position:**

Standalone energy storage customers will use energy in one of three primary categories: load to charge the ESS, load to directly manage and maintain the ESS (e.g. essential HVAC), and load for station service to serve other processes and/or equipment at the facility that support ESS operation. Based on feedback from ISO, load for charging the ESS and for equipment essential to the operation of the ESS, including necessary HVAC, may be metered in aggregate as Charging Load. Station service load is permitted to be metered separately. The EDCs recognize the importance of accurate metering and billing to ensure responsible cost allocation for all energy delivered across the service territory. However in this situation the station service load may be relatively small with the cost and effort to separately meter this load outweighing the benefit of capturing the energy usage, particularly for certain supporting loads that may be justified as necessary for the operation of the facility. The EDCs currently have differing interpretations of available paths forward that would align with existing regulations at this time.

1. National Grid’s position is that where station service load for distribution connected ESS is of a de-minimis level and limited to specific load types in direct support of the ESS facility, it can be considered as part of Charging Load essential to the safe and secure operation of the ESS facility and does not require separate metering. This load would be the aggregate total of specifically defined site load, including IT and communications equipment, lighting, site safety and security equipment, and a limited number of general purpose outlets. The total load of this type would need to be under 25kW maximum and 15,000kWh annually in order to qualify as “de-minimis”. Customers must identify the station service loading at the time of application, and must certify that the loads meet and will remain within these criteria for the life of the project. In this situation the station service load would be connected and billed behind the same meter as the ESS, and may be considered essential Charging Load for wholesale purposes. For station service load exceeding the kW and/or kWh threshold, separate metering would be required. Specific definitions of Charging Load and Station Service are included in National Grid’s Electric Service Bulletin 756.
2. Eversource position
3. **Industry Position:**

# Requested DPU Action:

INSERT REQUESTED ACTIONS, IF ANY.