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Request from: Public Utilities Regulatory Authority

Question:

Eversource Comments, Oct. 2, 2026, pp. 4–5. Propose potential sizing requirements for paired generation and storage resources that would provide confidence that energy storage system operations are appropriately optimized to generation output. Justify any recommendation provided.

Response:

Eversource recommends that the design of the successor programs include appropriate sizing and operational requirements for paired solar photovoltaic (PV) and energy storage resources to ensure that the storage component is meaningfully integrated with the associated generation resource and capable of meeting the applicable program requirements. Eversource believes the specific requirements would benefit from further consideration through a working group discussion.

Any such requirements should be evaluated in the context of the proposed multipart payment framework (MPF), including the targeted dispatch period and the expected duration and level of required discharge. The objective should be to ensure that a project has sufficient storage capability to satisfy its dispatch obligations, rather than adopting sizing thresholds that are disconnected from the program's intended operational requirements. For example, additional storage incentives available through the Solar Massachusetts Renewable Target ("SMART") Program a minimum storage power capacity equal to 25% of the paired solar facility's DC capacity, and incentive calculations do not consider storage power capacity in excess of 100% of the paired PV capacity.

The program rules should also include safeguards to prevent participants from structuring projects primarily to qualify for program participation or compensation without providing a meaningful paired solar and storage resource. The rules should be designed to prevent a participant from installing a relatively small PV system solely to satisfy a solar-pairing requirement while installing a disproportionately large battery that is not meaningfully integrated with the PV resource.

The working group should also consider requiring that paired storage charge from the associated on-site PV resource. Such a requirement could help ensure that the storage resource operates in conjunction with the paired renewable generation facility rather than relying primarily on electricity from the grid to charge. Requirements for paired energy storage resources to exclusively charge from co-located generation has also been incorporated as an eligibility for net metering by the Massachusetts Department of Public Utilities.