



# Energy Storage (ES) Accreditation Conceptual Amendment

**Proposal: For accreditation purposes, adjust the quantity of modeled ES downward by a fixed quantity to mitigate the adverse impacts of 'at criteria' modeling**

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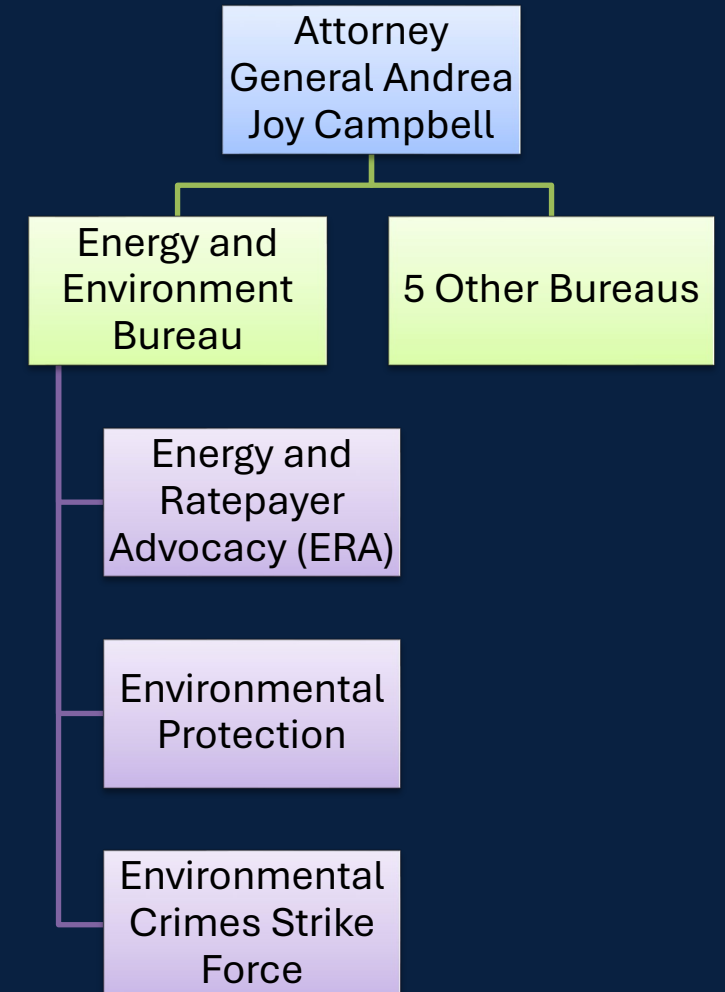
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- Our job:
  - Ensure that Massachusetts residents and businesses have access to reliable, safe, and affordable energy
  - Support an equitable and affordable clean energy transition
  - Protect consumers from predatory energy company practices





# The CAR-SA Accreditation Problem for ES

- “At criteria” accreditation in CAR-SA creates a unique problem for ES resources
  - Large quantities of artificial load must be added to bring the system to “at criteria” reliability, especially in winter
  - This addition absorbs load that would otherwise be available for ES charging
- “At criteria” modeling depresses ES accreditation
  - Solar PV/wind receive significant accreditation *benefits* from ES
  - ES accreditation does not receive a corresponding benefit
  - All else equal, these market signals would encourage solar PV/wind and discourage ES development
  - However, to maximize resource adequacy and reliability benefits of these resources, market signals should incentivize development of solar PV/wind ***in conjunction*** with ES
- “At criteria” modeling incentivizes long-duration over short-duration ES
  - No commercial long-duration ES in the region
  - Optimal amount of long-duration ES is unclear, and does not address tradeoffs (e.g., cost, efficiency, etc.)
- **The problem for ES is a persistent feature of the CAR-SA accreditation model**
  - “At criteria” system will always absorb any energy that should be available for charging
  - Cannot add energy (from imports, non-capacity resources, etc.) while maintaining system “at criteria”
  - Accreditation disadvantage will apply to ES unless ES share of the resource mix is much lower



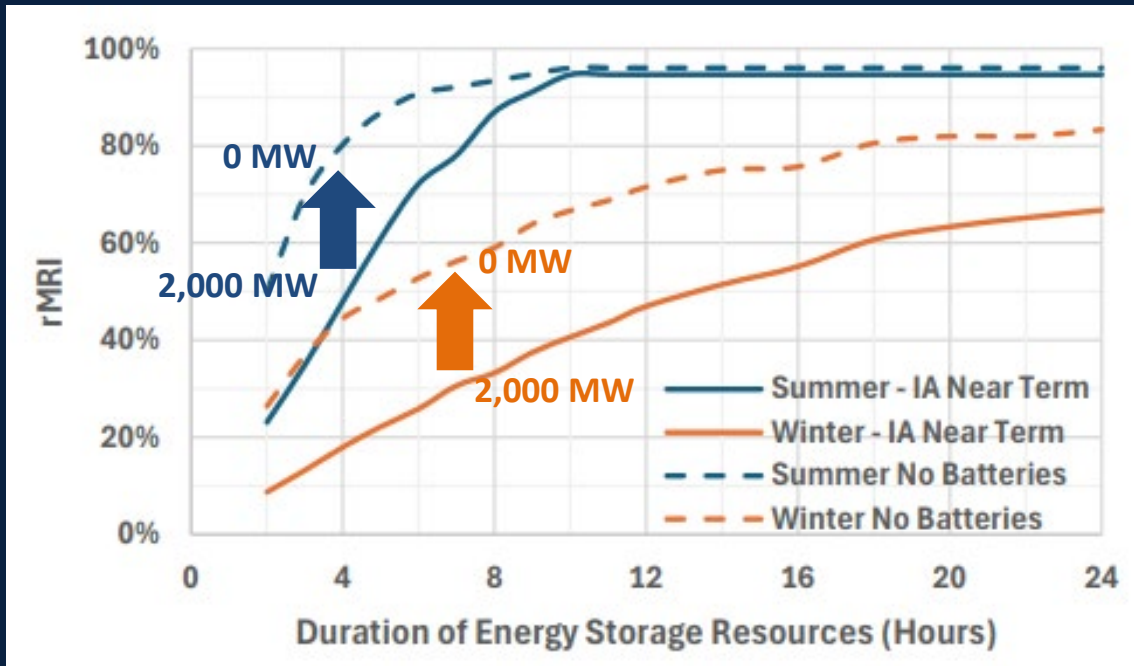
# Options to Mitigate and / or Solve the ES Accreditation Problem

- Potential levers
  - Increase ES duration
  - Decrease duration of simulated MRI events
  - Increase energy available for charging
  - Reduce ES participation
  - Increase co-location of ES and solar PV/wind
- Can be accessed directly (e.g., through changes to the model) or indirectly (e.g., heuristic adjustments to model assumptions)
- **Today's presentation focuses on a heuristic adjustment that indirectly accesses several of these levers**



# ES rMRI is Sensitive to ES Quantity

Proxy ES Resource rMRI Duration Curve



[CAR-SA: RA Modeling IA Additional Results](#), ISO-NE, May 2026 MC, at 59.

- rMRI increases for all ES durations as participating ES quantity is decreased
- Modeling fewer ES MW than are actually participating could address the unique disadvantages of the CAR-SA “at criteria” modeling for ES.
  - Reduce the actual quantity of participating resources (ES(Q) by some amount (x)
  - Accredit ES assuming participation of ES(Q-x)
  - Apply accreditation of ES(Q-x) to the actual quantity of participating resources (ES(Q)
- **Benefits of Removing x MW from Accreditation**
  - Gives back some energy for charging
  - Reduces event duration (through reduction in Type 2 and 3 MRI hours)
  - Establishes a proxy for energy for charging that should be available to ES

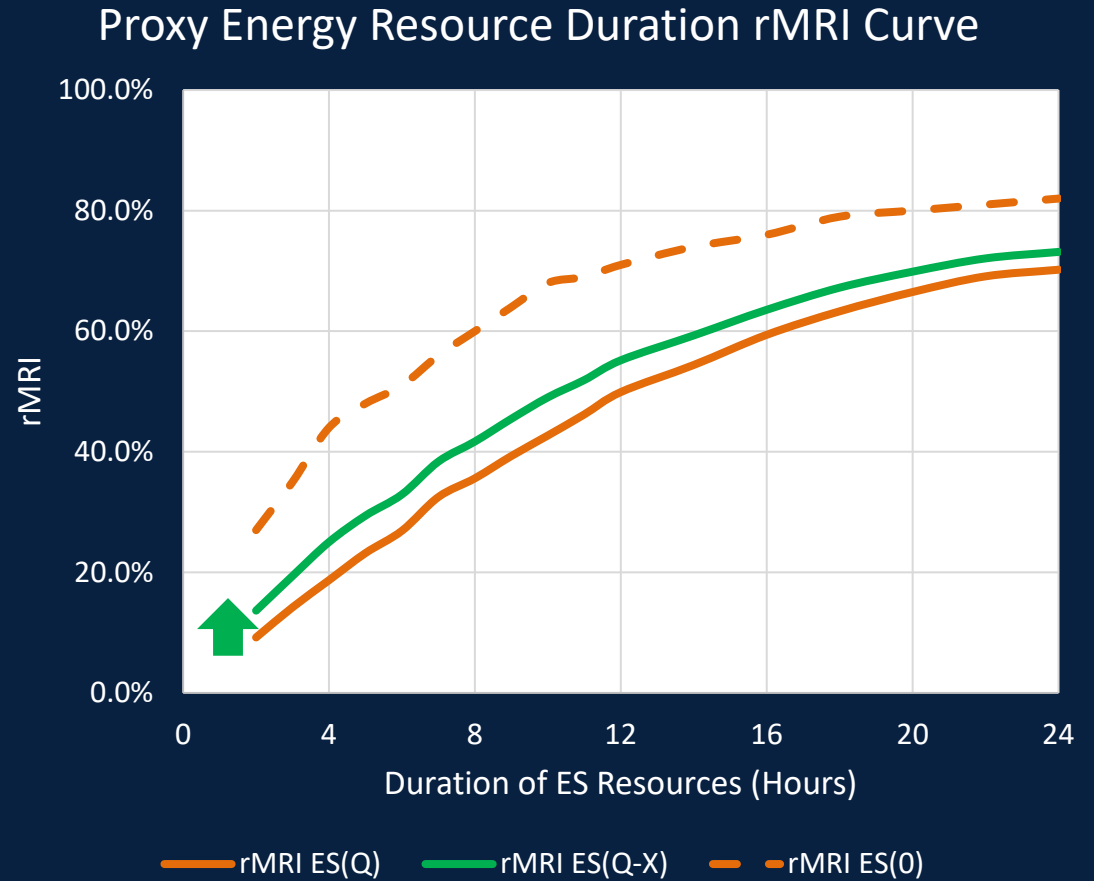


# Proposal: Accredite ES at a lower quantity, apply accreditation values to full quantity

- *Figure is for illustrative purposes only*
- Given the following parameters
  - **ES(Q)**: actual quantity of ES expected to participate in the winter auction
  - **ES(0)**: ISO sensitivity case removing 2,000 MW
  - **ES(Q-x)**: quantity of ES expected to participate in the winter auction minus a constant x MW
  - **x**: proxy to relieve some of the charging constraints imposed on ES(Q) at criteria by reducing assumed MW of ES in accreditation

## Proposal

1. Set **x** to reflect desired level of relief from charging constraints imposed on **ES(Q)** at criteria
  - MA AGO does not advocate for a specific value of x at this time
2. Accredite ES assuming **ES(Q-x)** rather than **ES(Q)**
  - Essentially another sensitivity model run
3. Apply accreditation values for **ES(Q-x)** to **ES(Q)**
4. Accredite other resources assuming **ES(Q)**





# Proposal Benefits

1. **Flexible Adjustment:**  $x$  can be set to provide the appropriate relaxation to “at criteria” charging constraints on ES
2. Adjustment applies **consistently** to all ES durations -- including resources that are currently or likely to be commercial in the next few years
3. Maintains ISO-NE’s preferred “at criteria” conditions for all resources
4. Limited model/market design/implementation impacts (*i.e.*, analysis to determine appropriate  $x$ , ES accredited via a stand-alone sensitivity case)
5. Does not impact accreditation of other resource types
6. Can be applied on an ongoing basis (rMRI still diminishes at increasing quantities of ES)
7. Could be applied to both seasons



# Questions / Feedback

**Thank you!**

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