UNITED STATES OF AMERICA
BEFORE THE
FEDERAL ENERGY REGULATORY COMMISSION

Ensuring the Timely and Orderly Interconnection of Large Loads	))))	**Docket No. RM26-4-000**

COMMENTS OF THE U.S. ENERGY STORAGE COALITION ON ADVANCE NOTICE OF PROPOSED RULEMAKING

The U.S. Energy Storage Coalition (ESC) unites America's leading grid battery manufacturers, energy storage developers, owners, and operators. The Coalition advances policies and solutions to ensure grid reliability amidst historic demand for power, lower energy costs for all Americans, strengthen grid capacity to support new industrial and AI infrastructure, and rapidly scale American manufacturing and minerals production.

The ESC commends the U.S. Department of Energy and Federal Energy Regulatory Commission (FERC) for evaluating measures to enable the interconnection of large loads by leveraging strategies and resources that enhance flexibility, mitigate grid impact, and ultimately stabilize electricity prices for all consumers. Energy storage is a unique resource and tool for quickly enhancing flexibility and with the appropriate FERC action, can better support and maximize America's baseload energy resources to boost capacity and serve new large loads. The ESC therefore urges the Commission to move forward promptly, and to ensure that storage deployment can keep pace with large load interconnections.

Load Flexibility Can Support Speed to Power, and Energy Storage is an Integral Technology

The ANOPR's proposal to expedite interconnection studies for large loads and hybrid facilities that agree to be curtailable and dispatchable can, if implemented effectively, significantly increase the pace of interconnection for large loads and their associated supply resources. In particular, the ESC urges the Commission to take note in any subsequent

rulemaking that energy storage is uniquely situated to make an expedited interconnection process for large loads both feasible and reliable. As a threshold matter, the Commission should specify that storage resources can be considered as part of a load-supply hybrid. The ANOPR defines the term "hybrid facility" as "[large loads] seeking to share a point of interconnection with new or existing generation facilities;"[1] just as the Commission's Large Generator Interconnection Procedures accommodate energy storage, its definition of "hybrid facilities" in the large load context should also include energy storage.

Next, ESC urges the Commission to ensure that hybrid facilities have a means of expediting their interconnection to the transmission grid. The ANOPR proposes that load and hybrid facilities be studied *together* with generating facilities,[2] and that curtailable or flexible loads should have an expedited pathway to interconnection.[3] Energy storage is uniquely positioned as a rapid pathway for making loads curtailable and flexible, enabling them to potentially seek and obtain expedited interconnection. Experts estimate that more than 100 gigawatts of large new loads, for example, can be integrated into the grid with minimal impact and with only modest, short-duration reductions in withdrawal from the system. [4] Energy storage is a solution well-suited to exactly this type of curtailment. Enabling large loads to avoid drawing from the grid by maintaining dispatchable energy during peak demand events—when transmission constraints are most salient—can dramatically reduce or eliminate the need for network upgrades that would otherwise require years of study and construction (as well as sizeable costs) to accommodate. Storage accomplishes this by charging during off-peak periods,

---

[1] ANOPR at P12.

[2] ANOPR at P20.

[3] ANOPR at P24.

[4] Norris, T.H., T. Profeta, D. Patino-Echeverri, and A. Cowie-Haskell, "Rethinking Load Growth: Assessing the Potential for Integration of Large Flexible Loads in U.S. Power Systems," at 2 (2025) ("The average duration of load curtailment (i.e. the length of time the new load is curtailed during curtailment events) would be relatively short, at 1.7 hours when average annual load curtailment is limited to 0.25%, 2.1 hours at a 0.5% limits, and 2.5 hours at a 1.0% limit"), https://nicholasinstitute.duke.edu/publications/rethinking-load-growth

and discharging to serve load during system peaks or extended periods of grid constraints. This load-shaping capability means that storage-backed loads can often interconnect with minimal system impact, justifying the expedited study timelines the Commission contemplates.

The Commission should also ensure that load commitments to flexibility can be met by resources physically and/or electrically adjacent to load. ESC expects that the record in this proceeding will contain substantial information on what circumstances a supply resource should be presumed sufficiently "adjacent" to ensure load flexibility obligations. As one example, SPP's recent High Impact Large Load proposal would enable expedited interconnection for load paired with generation, if the resources are within two substations of one another, or one substation if the transmission facility between them is 765kV.[5] These types of presumptions, when based upon record evidence, may be helpful in providing clear rules of the road for load and supply pairings. Importantly, the study of such adjacent, paired resources should coordinate the study of loads between energy storage resources paired with large loads, which would be expected to operate in a coordinated manner.

Further, consistent with the proposals to study load and supply together, and to expedite interconnection for flexible loads, the Commission should ensure in any final action that storage resources are permitted to charge in low-usage intervals, when doing so will not trigger the need for expensive and long-lead-time upgrades that could easily place loads behind their planned interconnection schedules. These limited withdrawal rights should be applicable in defined, constrained intervals, that will enable flexibility while also providing clarity regarding which constraints are binding, and which actions are needed to avoid any adverse impacts. Storage can provide large load customers with valuable optionality to tap faster pathways that provide speed to power, particularly in transmission-constrained regions where firm interconnection may be unavailable or prohibitively expensive. However, if storage resources are studied using

[5] Southwest Power Pool, *Submission of Tariff Revisions to Add the High Impact Large Load Processes and High Impact Large Load Generation Assessment*, Docket No. ER26-247 at 26-27, (2025)("To be considered within the same electrically local area, the POI of the Generating must be no more than two substations away from the HILL.").

unrealistic assumptions (for instance, that they would opt to charge in congested, high-priced grid intervals), the resulting unnecessarily lengthy study processes could limit load's ability to benefit from this quickly-deployable asset. It is also important that storage resources' charging be allowed to be studied at the same time as storage injections, either in an integrated single interconnection process or simultaneously in generator and load interconnection processes. The Commission's requirement in Order No. 2023 that storage be modeled based upon intended use sets a clear pathway for hybrid interconnection as well.[6]

Real-world examples demonstrate storage's effectiveness in enabling load flexibility today. Iron Mountain, for example, is installing a battery system equal in size to its New Jersey data center's load, enabling the data center to "effectively disappear from the power grid for hours when the grid is under duress, and charge when clean energy is abundant."[7] At the xAI Colossus facility in Tennessee, Tesla Megapacks were installed on-site in a matter of months to provide load smoothing services.[8] Other data center developers like Aligned Data Centers have begun to implement strategies that the ANOPR contemplates by announcing that it would pay for a new 31-megawatt/62-megawatt-hour battery alongside a forthcoming data center in the Pacific Northwest to enable the data center to get online "years earlier than would be possible with traditional utility upgrades," by electing to operate as curtailable load.[9]

---

[6] *See* Improvements to Generator Interconnection Procedures and Agreements, 184 FERC ¶ 61,054 (2023) at P1515 ("Order No. 2023") ("We adopt the proposed revisions to …require interconnection customers to include in their interconnection request the proposed operating assumptions that reflect the proposed charging behavior of the electric storage resource and a description of any control technologies that will limit the operation of the electric storage resource to its intended operation.").

[7] Chris Pennington, Iron Mountain Data Centers, "The changing face of data center sustainability," (July 11, 2025), https://resources.ironmountain.com/blogs-and-articles/d/data-centers-the-changing-face-of-data-center-sustainability.

[8] Tesla, "Megapack for Data Centers: Powering the Growth of AI Infrastructure." (November, 2025). https://digitalassets.tesla.com/tesla-contents/image/upload/megapack-resources-megapack-for-data-centers-powering-growth-of-ai-infrastructure.pdf

[9] Julian Spector, Canary Media, "In a first, a data center is using a big battery to get online faster" (October 24, 2025) https://www.canarymedia.com/articles/batteries/aligned-data-center-get-online-faster

The Commission should also carefully evaluate the record in this proceeding to evaluate core questions on load flexibility, as well as thoughtful incorporation of storage to facilitate that flexibility. On the storage side, the Commission should consider carefully whether any rules developed for large loads are appropriate to extend to, or alternatively to exempt, energy storage resources in charging mode. In market operations, energy storage charging is a sale for resale and thus fundamentally different from large loads. The Commission may find reasons why such logic should differentiate energy storage charging from large load treatment in the interconnection process, or alternatively efficiencies to be gained by applying similar rules to energy storage as large loads for accelerating interconnections.

Additionally, the Commission should take stock of a barrier that is hindering the rapid deployment of energy storage resources: certain energy storage and hybrid resources are not accredited in capacity markets today. The Commission should ensure that all grid operators develop capacity accreditation values for long-duration energy storage (>10 hours in duration), multi-day energy storage (>24 hours in duration), and hybrid resources that include various combinations of storage and generation. No organized market today has accredited battery durations beyond 8 hours. Similarly, no organized market has defined the capacity accreditation for hybrid resource with long-duration energy storage combined with another type of generator technology. Although hybrid resources are complex, as they have many potential configurations and variables, it is both highly achievable and necessary to develop a range of values for such resource pairings. To fully recognize the physical and operational characteristics all storage resources, including long-duration and multi-day storage, consistent with Commission precedent,[10] the Commission should ensure that grid operators capacity accreditation values for these

[10] FERC Order No. 841 requires RTOs/ISOs to establish market rules that recognize the physical and operational characteristics of electric storage resources and facilitate their participation in RTO/ISO markets, and "ensure that a resource using the [participation] model is eligible to provide all capacity, energy, and ancillary services that it is technically capable of providing." *See Electric Storage Participation in Markets Operated by Regional Transmission Organizations and Independent System Operators,* 162 FERC ¶ 61,127 at P115.

resources. This action will unlock the potential of long-duration energy storage to support large load interconnections, strengthen grid reliability, and reduce capacity market prices.[11]

On the load side, major considerations include the percentage of load that must be curtailable, how many hours annually a load must be flexible, what response times are required, and whether curtailability commitments must be firm or may be conditional on operational constraints. Without objective criteria, transmission providers will apply inconsistent standards, and developers will face regulatory uncertainty that undermines the benefits of expedited processing. The Commission should also be open considering and taking stock of regional differences on these issues.

In closing, the Energy Storage Coalition again expresses its support for the Commission swift action to implement measures that enable the timely interconnection of large loads while fully leveraging the flexibility and grid-strengthening value that energy storage provides. With appropriate FERC action, energy storage can rapidly enhance system flexibility, support and maximize America's baseload energy resources, and deliver additional capacity to reliably serve new industrial and AI-driven demand. By advancing policies that allow storage deployment to keep pace with large load growth, the Commission can help stabilize electricity prices for consumers while strengthening America's energy and economic security.

Respectfully,

Noah Roberts
Executive Director
U.S. Energy Storage Coalition
(202) 860-9256
noah@energystorage.org

November 21, 2025

[11] *See for additional context on commercial impacts,* Pre-Conference Comments of Form Energy, May 23, 2025, FERC Docket No. AD25-7-000, Commissioner-led Technical Conference Regarding the Challenge of Resource Adequacy in Regional Transmission Organization and Independent System Operator Regions