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**Subject:** Storage plus Solar  
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MNSEIA seeks clarification on a number of issues regarding storage.

#### Peak Demand Management

1. One of the primary purposes of on-site Energy Storage Systems is for managing peak demand. As such, the ESS would import energy from the grid during non-peak periods and be used to meet peak demand during on-peak periods. Is it the intent of the new standards to ensure that these systems would be intended to never supply power back to the grid (non-exporting)?
2. Are limitations to the import of energy to charge an EES envisioned?
  - a. Will the EES be controlled to avoid importing energy during utility peak periods?
  - b. Alternatively to 2.a. above, will utilities be able to interrupt charging an EES for short blocks of time during peak demand periods, similar to AC saver switches?

#### Non-Importing storage

1. Non-importing EES rely on on-site generation of some type.
2. Consequently, will such systems be constrained from either importing or exporting?

#### Storage plus on-site solar generation

1. EES plus solar systems are intended to use solar power to charge the EES that can then be used to power loads during non-solar periods.
2. The EES will have a password-protected controller to prevent export.
3. Would the EES be permitted to be charged by imported energy during periods of low solar output?
4. If the storage system is fully charged and the solar system is generating more than on-site loads, the solar system should be allowed export energy to the EPS under net metering arrangements.
  - a. How will exported energy generated by the solar system be monitored?
  - b. How will the EPS know that the energy being supplied is generated by solar power (eligible for net metering) rather than being exported by the EES?
5. If a DER is installed without an EES, what level of review will be necessary for the owner of the DER to add storage capacity?
  - a. Should the threshold for detailed interconnection review be based on the respective size of the solar and storage systems?
  - b. At what level might multiple DER's on a distribution feeder trigger an interconnection review if an owner of a DER adds storage?

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