

**TO:** Rick Abraham, National Grid  
**FROM:** Dr. William Acker, NY-BEST  
**DATE:** December 8, 2025  
**RE:** Interconnection Study Charging Windows



Dear Rick,

Thank you for the opportunity to provide feedback on the assumed charging windows for Battery Energy Storage Systems (BESS) submitting interconnection applications to National Grid, as part of the Standard Interconnection Requirement (SIR) process.

**Recommendation:** NY-BEST recommends that National Grid allow developers to choose one of three pathways for their interconnection study:

1. Unlimited - BESS can charge and discharge at any time.
  - a. *Note: This pathway is important to maintain for projects participating in the NYISO markets, particularly as frequency regulation and other ancillary services require being available to charge during daytime hours.*
2. Limited - Broad charging window: 10pm - 2pm (14 hours)
3. Limited - Narrow charging window: 11pm - 8am (9 hours)

For the limited charging window pathways (#2 and #3), NY-BEST recommends National Grid allow BESS facilities to consume “de minimus load” at any time to power auxiliary loads, in line with current National Grid regulations in Massachusetts. In Massachusetts, National Grid caps “de minimus load” at 200 kW. We recommend National Grid align its regulations in New York accordingly.

**Rationale:**

- For safety, auxiliary loads should not be powered from the BESS itself. Auxiliary loads for BESS typically include:
  - Fire detection and suppression systems, which require continuous grid power per NFPA 855/IFC standards;
  - Monitoring and control equipment, which must remain powered even when BESS are taken offline for corrective or preventative maintenance;
  - Thermal management, including HVAC, which is critical for maintaining safe cell temperature and humidity levels even when BESS are offline or depleted.
- Auxiliary loads for BESS facilities under 5 MW are typically less than 4% of nameplate capacity.

- Notably, some manufacturers (e.g. Tesla) only support auxiliary loads from the main interconnection point and cannot utilize secondary service, making the de minimus load allowance essential.

Thank you for the opportunity to provide feedback. Please don't hesitate to contact us at 518-694-8474 or by email at [info@ny-best.org](mailto:info@ny-best.org).

Respectfully submitted,

A handwritten signature in cursive script, appearing to read "William Acker".

Dr. William Acker  
Executive Director, NY-BEST