



provision from certain generation assets. However, although other commenters in this docket discuss the adequacy of the Uniform System of Accounting (“USoA”) for equipment associated with reactive power provision in various types of *generation* assets, there has not been sufficient attention to accounting associated with *energy storage* resources that provide reactive power, distinct from generation. This lack of clarity has led to disagreements about these assets’ eligibility to receive cost-of-service rate recovery for the provision of reactive power, as well as differing treatment from region to region.

While energy storage is not discussed in the Commission’s Notice of Inquiry, energy storage resources are equally important and would greatly benefit from the same clarity in treatment as other assets. Accordingly, ESA agrees with EEI and ACP that the Commission should convene a technical conference to address USoA gaps associated with reactive power provision, prior to moving to a rulemaking proceeding. ESA would additionally request the inclusion of energy storage resources in such technical conference discussions.

Respectfully submitted,

**THE U.S. ENERGY STORAGE ASSOCIATION**

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**CERTIFICATE OF SERVICE**

Pursuant to Rule 2010 of the Commission's Rules of Practice and Procedure, I, Anne O'Hanlon, certify that on this day that I emailed or mailed, postage prepaid, a copy of the foregoing document to all parties on the official service list posted by FERC

Dated at Boston, MA this 26<sup>th</sup> day of April, 2021.



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