



Newsletter
Energy Industry Group

Draft of Resolution on the integration of energy storage systems

On May 6th, the National Commission for Regulatory Improvement ("CONAMER") published the preliminary draft of the "Resolution of the Energy Regulatory Commission issuing the General Administrative Provisions for the integration of Energy Storage Systems into the National Electric System" (the "Resolution").

The purpose of the Resolution is to establish the general conditions for the orderly and economically viable integration of Energy Storage Systems ("ESS") into the National Electric System ("SEN"), allowing counteraction of the variability component of intermittent Power Plants and to take advantage of the products that ESS can offer to improve the efficiency, quality, reliability, continuity, safety, and sustainability of the SEN.

As for its content, the Resolution establishes and expands on the following elements: the general conditions applicable to ESS; the different modalities of ESS for integration into the SEN; the general requirements that interested parties must meet (including obtaining or modifying the corresponding permit); and the interconnection or connection process that must be observed for the integration of ESS.

The Resolution sets forth the following modalities for integration into the SEN: i) ESS associated with a Power Plant (intermittent); ii) ESS associated with a Load Point; iii) ESS associated with an Isolated Supply scheme; iv) ESS of Exempt Generators (distributed generation) and v) Non-Associated ESS (not integrated into any Power Plant or Load Point).

Different requirements will apply to each ESS modality in terms of the application and content of the permit, interconnection and connection studies, and the power output of the ESS.

In the case of ESS associated with a Power Plant, it is emphasized that its charging must be carried out with the resources of the associated intermittent Power Plant, and its discharge will address the variability of the primary source, compensating for the produced intermittency.

ESS associated with a Power Plant, as well as those associated with an isolated supply scheme and those non-associated, must apply for a new generation permit or, if already in operation, the modification of the existing permit.

On the other hand, ESS associated with an isolated supply scheme must have infrastructure to ensure that there will be no injection of energy into the national transmission grids or the general distribution grids.

It is worth noting that, in order to install an ESS in any modality under a Legacy Interconnection Contract, interested parties must exclude themselves entirely from said contract and from the associated permits granted under the Electricity Public Service Law.

The Resolution has been classified with a High Regulatory Impact. Consequently, it will follow the ordinary process and deadline for assessment and comments can be made during the public consultation. This classification

highlights the relevance and complexity of the draft, which will require detailed analysis and adequate time for assessment.

If you require regulatory advice in this regard, our team of specialists are at your disposal to provide legal services tailored to your needs.

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