

It is essential to consider whether the BESS aspects of the proposal properly meet the requirement for a NSIP. Batteries do not generate energy; they only store it. In particular a large BESS system could absorb (store) energy from the grid for lengthy periods, operating effectively at "negative power" (since it is being absorbed and not generated) which certainly does not meet the 50 MW power generation threshold required for a NSIP. Under such conditions they do not satisfy the requirements for being a NSIP. Moreover they could easily operate even in discharge for long periods at less than 50 MW, again not satisfying the requirements for a NSIP. The procedural propriety of Examining this proposal as a NSIP must be determined.