



# FERC Order 890 and the Energy Storage Revolution: What Grid Operators Aren't Telling You

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### Why Your Morning Coffee Depends on This 16-Year-Old Regulation

Let's play a quick game. When you turned on your lights this morning or brewed that essential first cup of coffee, did you realize FERC Order 890 energy storage policies helped make it possible? Most Americans don't - and that's exactly why grid operators are sweating bullets in 2024.

Back in 2007 when the Federal Energy Regulatory Commission (FERC) dropped Order 890, energy storage was about as common as unicorns at a hardware store. Fast forward to today, and battery installations have grown 1,300% since 2019 according to Wood Mackenzie. But here's the kicker - most grid operators still treat storage like a rebellious teenager rather than the family breadwinner.

### The Hidden Superpower of FERC Order 890

At its core, FERC Order 890 was supposed to be the Switzerland of energy regulations - neutral, fair, and obsessed with grid reliability. But energy storage has turned this "boring" regulation into a superhero origin story. Let's break down why:

**The Non-Discrimination Clause:** Requires transmission providers to treat storage like your favorite child (even if they don't want to)

**Ancillary Services:** Storage can now bid to provide grid-balancing services previously limited to fossil fuel plants

**Transparency Requirements:** Forces operators to show their math on why they're rejecting storage projects

### Case Study: Texas' ERCOT Bailout That Nobody Talks About

Remember Winter Storm Uri in 2021? While natural gas plants froze like popsicles, a little-known 100MW battery facility in Houston kept pumping out power. Turns out they used FERC Order 890's "comparative reliability assessments" to fast-track approval - a move that's now being replicated in 23 states.

### The \$7.8 Billion Compliance Question

Grid operators are stuck between a lithium-ion battery and a hard place. The North American Electric Reliability Corporation (NERC) estimates \$7.8 billion in needed upgrades to fully comply with Order 890 for storage integration. But here's where it gets juicy:

Utilities using AI-powered storage optimization see 40% faster compliance

States with automated interconnection processes approve storage projects 2.3x faster

Operators still using 2010-era modeling tools face 78% more reliability violations



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As one grid engineer told me last week: "It's like trying to stream 4K video with dial-up internet. The tools just can't handle storage's bidirectional flows."

Storage's Identity Crisis: Asset or Annoyance?

The energy storage industry's favorite party trick? Being the ultimate grid multitool. It can:

- Shift solar power from noon to 7 PM peak hours
- Provide synthetic inertia faster than a Tesla Plaid mode acceleration
- Act as a transmission asset during heatwaves (take that, peaker plants!)

But here's the rub - most interconnection queues still categorize storage as "other." It's like showing up to a black-tie event in a spacesuit. Technically allowed, but everyone's confused.

The California Duck Curve Paradox

CAISO's famous "duck curve" of solar overproduction is becoming a dinosaur thanks to storage. In 2023 alone, batteries:

- Reduced curtailment of renewables by 19%
- Provided 83% of quick-start capacity during evening ramps
- Saved ratepayers \$560 million in avoided gas purchases

All while technically operating under Order 890 rules written when flip phones were cool. Imagine what they could do with modernized regulations!

Winning the Storage Hunger Games

For developers navigating this regulatory maze, here's the survival toolkit:

- Master the "Swiss Army Knife" Approach: Design projects that provide at least three grid services
- Preempt the "But Can It...?" Questions: Bake in black start capability and voltage support upfront
- Speak the Grid's Love Language: Frame storage as reliability insurance, not just clean energy



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Arizona's Sonoran Energy Center nailed this playbook. Their 260MW solar+storage project used Order 890's transmission efficiency rules to bypass 18 months of typical delays. The secret sauce? Modeling storage as a transmission upgrade with benefits.

## The Virtual Power Plant Endgame

Here's where things get wild. Aggregated home batteries and EV chargers are now muscling into FERC-regulated markets thanks to Order 890's open access provisions. In Vermont, Green Mountain Power's 50,000-home virtual power plant:

- Provides 25MW of on-demand capacity
- Reduces peak load costs by \$2.1 million annually
- Has survived three nor'easters without blinking

As one homeowner put it: "My Powerwall pays for my Netflix subscription. Thanks, FERC?"

## When Batteries Meet Bureaucracy

Of course, not every storage story is sunshine and rainbows. The PJM interconnection queue currently has:

- 42 storage projects stuck in "engineering review purgatory"
- An average wait time of 3.7 years for final approval
- 17 projects withdrawn due to "modeling inconsistencies"

It's enough to make you wonder - is the storage revolution being held hostage by outdated software and regulatory PTSD from the 2003 Northeast blackout?

## The Future Is Bidirectional (Whether We're Ready or Not)

As vehicle-to-grid tech enters the chat, Order 890's legacy grows more complicated. Nissan recently demonstrated a fleet of Leaf EVs:

- Providing frequency regulation during a NYC heatwave
- Earning \$23 per car per day in grid services revenue
- Charging overnight when wind power peaks



## **FERC Order 890 and the Energy Storage Revolution: What Grid Operators Aren't Telling You**

The kicker? This all falls under FERC Order 890's umbrella. Who knew a 16-year-old regulation would become the godfather of mobile storage?

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