

Unlocking Federal Tax Credits for Industrial Battery Storage

A Practical Guide to ITC Benefits for Behind-the-Meter BESS Projects

Summary

The U.S. federal Investment Tax Credit (ITC) can reduce the effective cost of behind-the-meter (BTM) battery energy storage systems by approximately 25%, making projects significantly more attractive for industrial facilities. This guide explains how the ITC works, what qualifies, and—most importantly—the practical timing considerations that affect project economics.

Key Takeaway: When Kelvolta structures your BTM BESS project with third-party financing, we handle ITC monetization on your behalf. Understanding these provisions helps you appreciate why our turnkey solutions deliver immediate value without the complexity of tax credit administration.

Topics

Investment Tax Credit (ITC); battery energy storage systems (BESS); behind-the-meter (BTM); tax equity financing; project finance.

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What is the Investment Tax Credit for BESS?

The Inflation Reduction Act (IRA) of 2022 established a standalone 30% ITC for energy storage systems installed between 2022 and 2032.¹ Previously, storage could only claim the ITC if paired with solar generation. Now, standalone BTM battery systems qualify independently.



The 30% Becomes ~25% in Practice

While the statutory credit is 30% of project costs, the effective benefit to project economics is typically 25-26%. Here's why:

- The ITC creates taxable income (you must pay tax on the value of the credit itself)
- Third-party tax equity investors require returns of 6-8% annually
- Tax equity partnership structures typically allocate 99% of tax benefits to investors who contribute ~40-45% of project capital
- After accounting for tax equity structuring costs and investor returns, the net present value benefit is approximately 25% of project costs

Bottom Line: A \$5 million BESS project effectively costs ~\$3.75 million after ITC monetization through third-party finance.^{2,3}

BESS Policy Certainty Through 2032

The One Big Beautiful Bill Act (enacted July 2025) significantly restricted solar and wind tax credits, requiring projects to begin construction by July 4, 2026, or be placed in service by December 31, 2027.⁴

Battery storage was exempted from these restrictions, maintaining full 30% ITC eligibility through 2032 with a gradual phase-down thereafter.^{1,4} This makes BESS one of the most policy-stable clean energy investments available today.

What Qualifies for the ITC?

Eligible Systems

- Battery energy storage systems with capacity of 5 kWh or greater^[1]
- Standalone storage (no solar pairing required)
- BTM systems serving on-site loads
- New equipment only (no used batteries)

Eligible Costs

The ITC applies to the total installed cost, including:^{1,3}

- Battery equipment (cells, modules, racks)
- Power conversion systems (inverters, transformers)
- Balance of system (enclosures, HVAC, fire suppression)
- Installation labor and engineering
- Interconnection equipment
- Energy management software integral to system operation

Key Requirements

- **Minimum Capacity:** System must have storage capacity of at least 5 kWh for commercial/industrial installations¹
- **New Equipment:** Only new battery systems qualify (no used equipment)¹
- **Placed-in-Service Requirement:** ITC is claimed in the tax year the system is commissioned and operational³
- **Foreign Entity of Concern (FEOC) Rules:** Beginning in 2026, projects must meet sourcing restrictions to avoid components from China, Russia, Iran, or North Korea^{1,4}

No Renewable Charging Requirement

A critical advantage: **standalone BESS qualifies for the full ITC without any renewable energy charging restrictions.**^{1,4} Unlike earlier ITC rules (pre-2023), there is no requirement to source 75% of charging energy from renewable sources. Your battery can charge from the grid, on-site generation, or any combination—the full 30% credit applies regardless.

This makes BTM BESS particularly attractive for facilities without existing solar installations or those in regions with limited renewable energy access.

Timing Considerations: When the ITC Clock Starts

Placed-in-Service Date

The ITC is claimed in the tax year when the BESS is fully operational—not when you sign contracts or begin construction.³ This creates critical timing considerations:

Project Milestone	ITC Impact
Q4 2025 commissioning	Tax equity investor claims credit on 2025 tax return (April 2026). Your project benefits immediately.
January 2026 commissioning	Tax credit claimed on 2026 return (April 2027). Delays tax equity investor's benefit by one year, slightly increasing required returns.
December 31 deadline	If project is 95% complete but not operational by December 31, ITC claim delays to next tax year.

Table 1: Timing impacts on ITC monetization

Development Timeline for ITC-Optimized Projects

To ensure timely ITC monetization, plan for these typical phases:³

1. **Pre-development** (2-3 months): Site assessment, utility coordination, preliminary engineering
2. **Equipment procurement** (3-4 months): Battery and inverter supply chain, long-lead equipment orders
3. **Interconnection** (3-6 months): Utility interconnection agreement and grid impact studies
4. **Construction** (2-3 months): Installation, commissioning, testing
5. **Tax equity close** (1-2 months concurrent): Structuring and legal documentation with investor

Total Timeline: 12-18 months from project initiation to placed-in-service.³

Critical Planning Point: If you want to monetize the ITC in 2026, you should initiate project development by Q1-Q2 2025 at the latest.

BESS Timeline Advantage: Unlike wind and solar projects (which face strict July 2026 / December 2027 deadlines under the One Big Beautiful Bill Act), standalone battery storage remains eligible for the full 30% ITC through 2032.⁴ This provides significant scheduling flexibility compared to other renewable technologies.

ITC Step-Down Schedule

The ITC is not permanent. Congress established a phase-down schedule:¹

Placed-in-Service Date	ITC Rate
2022-2032	30%
2033	26%
2034	22%
2035 and beyond	10%

Table 2: ITC phase-down for energy storage

Strategic Implication: Projects commissioned between now and 2032 capture maximum ITC value. Delaying projects beyond 2032 permanently reduces federal support by 4+ percentage points.

Domestic Content Bonus: An Additional 10%

Projects meeting domestic content requirements can claim an additional 10% ITC (40% total instead of 30%).^{1,3} To qualify:

- Steel and iron must be 100% domestically produced
- Manufactured components must have >55% domestic content (escalating annually)
- Supply chain documentation and certification required

Reality Check: Domestic content compliance is challenging for BESS projects due to limited US battery cell manufacturing. Most projects target the base 30% ITC. However, as US battery production scales (new factories from LG, Panasonic, Tesla), domestic content compliance will become more feasible by 2026-2027.³

Kelvolta's Approach: We track domestic content availability across our supply chain and will recommend domestic-compliant equipment when economics justify the additional complexity.

How Kelvolta Structures Third-Party Finance with ITC

When you partner with Kelvolta for a BTM BESS project, we manage the ITC process end-to-end:

Our Tax Equity Partnership Model

1. **We identify tax equity investors:** Kelvolta maintains relationships with institutional investors (banks, insurance companies) seeking renewable energy tax credits^{2,3}
2. **We structure the partnership:** Tax equity investors provide 40-45% of capital in exchange for 99% of tax benefits (ITC + depreciation)²
3. **We handle compliance:** Documentation, FEOC compliance tracking, ITC filings, and recapture risk management⁴
4. **You receive turnkey pricing:** Our project pricing reflects the ITC benefit—approximately 25% cost reduction versus non-ITC pricing
5. **We absorb execution risk:** If ITC is disallowed or reduced, we manage recapture exposure, not you

Why Third-Party Finance Makes Sense

Most industrial companies cannot efficiently use the ITC directly because:

- You may not have sufficient tax liability to absorb a \$1-2 million credit in a single year
- ITC recapture rules create five-year compliance obligations
- Tax equity structuring requires specialized legal and accounting expertise
- Your capital is better deployed in core operations, not energy infrastructure

Kelvolta's Value: We monetize the ITC through specialized investors, passing savings to you while eliminating administrative burden and risk.^{2,3}

Practical Guidance for Industrial Facility Owners

Questions to Ask Your Energy Storage Developer

1. How do you structure tax equity partnerships? What is your track record with ITC monetization?
2. How do you ensure FEOC compliance (foreign entity restrictions starting in 2026)?
3. Is your pricing "ITC-in" or "ITC-out"? (It should be ITC-in, with tax credit benefits already reflected)
4. What is your track record with tax equity closes? Can you provide references?
5. How do you handle placed-in-service timing to optimize ITC capture?

Red Flags

- Developers who require you to claim the ITC directly
- Pricing that doesn't clearly reflect ITC benefits
- Unwillingness to discuss recapture risk allocation
- Lack of tax equity investor relationships or project finance experience
- No clear plan for FEOC compliance and supply chain documentation

Conclusion: Let Kelvolta Handle the Complexity

The ITC represents substantial value—25% effective cost reduction for your BTM BESS project. But capturing that value requires:

- Tax equity structuring expertise
- FEOC compliance and supply chain documentation
- Precise timing coordination for placed-in-service deadlines
- Ongoing tax compliance and risk management

Kelvolta's turnkey approach means you benefit from ITC savings without the complexity.

We manage tax equity partnerships, ensure compliance, absorb risk, and deliver guaranteed performance—all while reflecting ITC economics in our pricing from day one.

Ready to explore how BTM BESS with ITC benefits can reduce your facility's energy costs?

Contact Kelvolta for a no-obligation assessment of your site's storage potential:

<https://www.kelvolta.com/contact>

Sources

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2. Norton Rose Fulbright. "Tax Equity Structures for Renewable Energy Projects."
3. Mintz, J., & Chen, L. "Monetizing the IRA Energy Storage ITC: Practical Considerations for Project Developers." *Project Finance Newswire*, March 2024.
4. White & Case LLP. "New Law Changes IRA Tax Credits." August 2025.
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