

TECHREG ALERT | REGULATORY INTELLIGENCE.**Battery Storage Auctions.**

Subject: Material change identified: the government formalizes national manufacturing requirements and BNDES certification for the December 2 auction.

1. What changed?

Resolution CIIA-PAC/CC No. 6, dated October 9, 2026, was published in the Federal Official Gazette on October 16.

The rule formalizes the nationalization requirements applicable to the 2026 Capacity Reserve Auction – National Storage, scheduled for December 2.

The resolution establishes three conditions:

- **National manufacturing:** storage systems must comply with the minimum requirements of Stage 1 of the BNDES accreditation regulation, with the possibility of using four nationalization pathways.
- **Pre-contract certification:** certificates issued by BNDES must be submitted to ANEEL before execution of the Capacity Reserve Power Contract (CRCAP).
- **Commercial operation:** proof of compliance will also be required during project implementation as a condition for the start of commercial operation.

The verification and inspection procedures will be detailed in the auction notice. The national manufacturing requirement already existed; the new development is its formal regulatory establishment and the more detailed definition of the compliance process.

2. Impact on market entry and manufacturing in Brazil.

The change is directly relevant to international manufacturers considering the establishment of industrial operations in Brazil.

BNDES clarifies that, for systems composed of separate AC and DC blocks, Stage 1 allows the manufacturer to choose which block will be assembled in Brazil, provided that all other applicable requirements are met.

However, the mere supply of imported components does not qualify as national manufacturing. Effective production activities are required, including assembly, integration, and testing.

The bank also clarifies that the supplier's initial accreditation represents only part of the process required to obtain a Finame code for the complete system.

3. Action requiring attention.

Priority: immediately validate the industrial localization strategy with BNDES.

For manufacturers interested in the National Storage Auction, the recommended actions are:

1. Confirm which of the four accreditation pathways is compatible with the system architecture.
2. Validate whether local assembly of the AC or DC block meets the applicable industrial requirements.
3. Identify Brazilian partners capable of carrying out the required production activities.
4. Prepare the technical and industrial documentation required for certification.

The timetable published by BNDES provides for **May 7, 2027** as the deadline for submission of the Accreditation Compliance Certificate, subject to confirmation in the final auction notice.

Why does it matter?

The resolution turns the nationalization requirement into a formal condition for contract execution and commercial operation.

For foreign manufacturers, this means that **their Brazilian industrial strategy must be aligned with BNDES requirements before the contracts are executed**, even if the physical implementation of local production follows its own timetable.

Next milestone: October 27, the expected date for ANEEL's approval of the auction notices, with publication scheduled for October 29.

Official sources: [Resolution CIIA-PAC/CC No. 6 — Federal Official Gazette](#) | [BNDES — Accreditation and industrial requirements for LRCAP 2026](#)

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