ENERGY
Development Partners

December 23, 2024

VIA ELECTRONIC MAIL

Stephanie De La Rosa, Commission Clerk
Rhode Island Public Utilities Commission
89 Jefferson Boulevard
Warwick, RI 02888

RE: Docket No. 24-34-EL – Development of Tariffs Applicable to Energy Storage Systems Connected to the Electric Distribution Systems

Energy Development Partner's Comments

Dear Ms. De la Rosa:

Enclosed are our comments for filing in the above-referenced docket. The comments are in response to a notice issued by the Public Utilities Commission on November 22, 2024 and a supplemental notice issued on December 6, 2024.

We greatly appreciate your help in this matter. If you have any questions, please reach out to us.

Sincerely,

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The following responses are our comments and responses to the stakeholder prompts.

Interconnection Tariff Framework (24-34-I)

1. Applicability

   a. What constitutes the distribution system? Some existing generation facilities have purpose-built interconnection that serve no other distribution customers and may never serve additional customers. Are these distribution facilities? Does it matter if those facilities are built to connect directly to the transmission system?

      The main characteristics of a distribution system are its operating voltages and, adherence to the state's distribution tariffs, including net meter and RIREG tariffs, servicing the retail base.

      Generation facilities servicing the distribution system include distributed generation (DG) facilities interconnected within the distribution system at the appropriate distribution voltages. In Rhode Island, the highest "distribution" voltage is 34.5kv.

      Systems interconnecting to voltages higher than 34.5kv should follow the Open Access Transmission Tariff (OATT).

   b. For storage facilities co-located with facilities subject to existing interconnection tariffs and processes, should the existing tariffs control?

      Storage facilities, whether co-located or not, should be subject to the appropriate DG tariff or OATT regulations in force at the time of receiving Authorization to Operate by the appropriate authority.

   c. Should a single interconnection tariff for all export facilities not subject to an existing interconnection tariff be developed, or should the current focus be on storage facilities? For example, examining a tariff for additional facilities, such as microgrids, could be useful, but could be more time consuming and delay the outcome on storage interconnection.

No, each export facility should have its own tariff based on their technical specifications; these specifications should include interconnection voltages, DG, Net Metering, QF, etc.

3. Study Process

a. What interconnection studies should be required for energy storage resources?

Same as the current study process: feasibility, impact, ASO, short-circuit, etc. The including a storage resource into a generation resource (e.g. PV + BESS) shouldn't require additional/separate studies. There should be an option for PV + BESS resources match to avoid grid congestion during high generation times such as solar hours.

There should be different classifications:

- Load-side storage
  - Demand Charge Management (Peak shaving)
  - Energy Arbitrage
- Generation-side storage
  - Generation shifting
  - Energy Arbitrage
  - Ancillary Services

However, since a BESS is not a Class 1 Renewable Energy Source, separate meters should be required. This is the case even if the BESS is coupled and charged by the DG facility.

Should the process allow for the applicant to seek alternative interconnection studies, for example one study without restrictions and one study subject to operational guidelines?

Yes, subject to the nameplate of the facility and the interconnection voltages

i. If alternatives are allowed, how should alternatives be initiated and sequenced?

When the interconnection application is submitted/requested, an option to shift the injection of energy into the grid to avoid congestion should be available. This would require the PV and BESS to have the same amount of energy and peak capacity.

b. What characteristics of the facilities, such as size, location, and/or configuration, should determine the study requirements?

As stated, size and configuration, i.e. interconnection voltage, PV + BESS standalone BESS should be considered. Geographic location should not. Whether the BESS is exporting or not should also be considered.

Costs

c. Should there be a payment schedule for interconnection costs?

Yes, but this could cause an administrative nightmare

i. What fees can be assessed fairly via a schedule?

Study costs.

ii. Which fees, if any, should depend on project scope and size?

Study Costs

Which other interconnection costs should be collected from applicants and how?

System modifications and network improvements as determined by the final impact study.

iii. What is reasonable timing for assessment and payment of study costs and construction costs?

Feasibility and Impact Studies applications should have monthly submission deadlines and grouped together. PSSE and PSCAD modeling should be a mandatory requirement and submitted with applications for DG and BESS facilities of 5MW and higher. Witness testing procedures also need to be included with the applications of 5MW or higher.

Cluster Studies groups, when required, should have specific deadlines to commence every six (6) months. No special consideration should be made for any one project. Only Applications previous meeting the prescribed monthly submission deadline, duly screened and submitted payments made within 30 days of the start of Cluster

Study should be considered. Meaning that Cluster Studies can only include approved applications from the previous five (5) months.

Initial assessments, including those within a Cluster Study, should be no longer than 12 months from the time of Application.

Construction timing to reach witness testing should be more flexible and consider market supply constraints.

d. Under what conditions, if any, should a storage facility be eligible for a reduction/credit to the interconnection construction costs? (See e.g., Tariff RIPUC No. 2243 Appendix A, Policy 3).

When the storage system is standalone and identified as critical infrastructure to reduce congestion times to inject energy into the system

8. Other: What other main elements can stakeholders identify that do not fall within the basic tariff structure provided above?