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December 20, 2024

**VIA HAND DELIVERY AND 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  
Rhode Island Energy’s Comments**

Dear Ms. De La Rosa:

On behalf of The Narragansett Electric Company d/b/a Rhode Island Energy (the “Company”), enclosed is the Company’s 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.

Thank you for your attention to this matter. If you have any questions, please contact me at 401-784-4263.

Very truly yours,

A handwritten signature in blue ink, appearing to read "Andrew S. Marcaccio".

Andrew S. Marcaccio

Enclosure

cc: Docket No. 24-34-EL Service List

**The Narragansett Electric Company  
d/b/a Rhode Island Energy  
Rhode Island Energy's Comments in Response to PUC-Led Workshop**

The following responses are the Company's initial impressions of the stakeholder prompts. Through the PUC-led workshops the Company expects to engage and collaborate with other stakeholders to evolve and modify considerations as appropriate.

**Stakeholder Prompts for an Interconnection Tariff Framework (24-34-I)**

**Prompt**

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

**Response**

- a. The Company's distribution system, or Electric Distribution System (EDS), as defined in R.I.P.U.C. No. 2258 Standards for Connecting Distributed Generation (DG) is "the electric distribution power system owned, controlled or operated by the Company used to provide distribution service to its Customers".

Purpose-built interconnections serving DG customers are not prohibited from serving load customers in the future. Such interconnections with retail service agreements would be considered distribution.

It does matter if it is built to connect directly to the Transmission system. One way in which it matters for example, is with respect to charges. In scenarios like this, the ongoing transmission operations and maintenance (O&M) charges referred to as direct assignment facility (DAF) charges need to be identified and specified in the customer's interconnection service agreement (ISA) and paid for by the customer until such time that other load customers are served from the same feeder.

- b. Existing storage facilities, regardless of whether those facilities are co-located with existing facilities subject to existing interconnection tariffs and processes, should continue to comply with those existing tariffs and processes.

Existing storage facilities that seek to change their operating procedures following the addition of a new, co-located facility should comply with whatever interconnection tariff and process is in effect when seeking interconnection of the new plus existing combined system. In effect, the existing storage facility can choose whether to continue operations under the existing tariff or reapply as a new combined facility under the new tariff.

New storage facilities added to existing facilities subject to existing interconnection tariffs and processes should comply with whatever interconnection tariff is in effect at the time of interconnecting the new storage facility.

- c. To comply with the statutory timeframe for the development of the framework and model tariffs, it would be helpful to limit the focus to energy storage systems (ESS) with the ability to expand upon in the future. Additionally, individual components of a microgrid comply with respective tariffs such as DG, ESS, and load.

## **Prompt**

### 3. Study Process

- a. What interconnection studies should be required for energy storage resources?
  - i. 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?
  - ii. If alternatives are allowed, how should alternatives be initiated and sequenced?

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

**Response**

- a. The study process requirements for DG interconnection should apply to energy storage resources. Depending on the energy storage resource characteristics and the interconnection details, this could result in a Feasibility Study, a distribution system impact study, or an Affected System Operator (ASO) study.
- i. The process should allow the applicant to seek one alternative study. Subsequent requests should be treated as a new application with a revised queue position date.
  - ii. The alternatives should be initiated and sequenced as follows: the customer's proposed schedule, which should meet the Company's operational guidelines, should be studied first. At this time, the Company will also provide an alternative to the customer that minimizes the system modification costs. The customer could either choose the alternative proposal, maintain the initial proposal, or re-apply to seek additional alternatives.
- If the customer's proposed schedule doesn't meet the Company's operational guidelines, it will be subject to a more detailed study with an expansive scope to determine how to avoid impact to existing capacity and operational flexibility.
- b. Facility size should determine the study requirements. General guidelines would allow systems less than 250kW to follow a simplified or expedited type of path while systems greater than 250kW would follow a complex type of path. General guidelines may be modified at the discretion of the Company.

Location should not determine study requirements.

Configuration (in terms of operation) should determine the study requirements. For example, an ESS configured for zero export is one configuration that would be studied in a different manner. The Company is willing to consider additional options for zero export proposals.

## Prompt

### 4. Costs

- a. Should there be a payment schedule for interconnection costs?
  - i. What fees can be assessed fairly via a schedule?
  - ii. Which fees, if any, should depend on project scope and size?
  - iii. Which other interconnection costs should be collected from applicants and how?
  - iv. What is reasonable timing for assessment and payment of study costs and construction costs?
- b. 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).<sup>6</sup>

## Response

- a. No, it would be challenging to implement a fair payment schedule for interconnection costs due to the variability of each interconnection. Like the interconnection process for DG interconnection, costs should be assessed via an engineering study.
  - i. Application fees can be assessed fairly via a schedule. Review or study fees can also be assessed fairly via a schedule provided they are updated periodically and fully reconciled. The current DG interconnection tariff cost structure should be applied, but the actual costs require review and update.
  - ii. The fee schedule requirements for DG interconnection should apply to energy storage resources.
  - iii. The interconnection cost requirements for DG interconnection should apply to energy storage resources.
  - iv. The timing for assessment and payment of cost requirements for DG interconnection should apply to energy storage resources.
- b. A storage facility shall not be eligible for a reduction/credit to the interconnection construction costs in conditions where there is negligible or no estimated annual Distribution Revenue to the Company.

**Prompt**

8. Other

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

**Response**

None identified at this time.

## **Stakeholder Prompts for a Terms and Conditions Tariff Framework (24-34-EL-TC)**

### **Prompt**

#### 1. Availability

- a. What types of energy storage resources should be eligible for service under a WDS?
- b. What types of energy storage resources should be eligible for service under a retail service tariff?
- c. Should storage facilities be considered a distinct class of customers because they have unique characteristics, warranting separate cost allocation and rates?
  - i. Are these characteristics different for similarly designed wholesale and retail storage systems?
  - ii. If storage facilities should be considered a distinct class of customers, should that apply to standalone, generation-sited, or other configurations?
- d. Should the tariff availability depend on concurrent enrollment in net metering, Renewable Energy Growth, or other programs or tariffs?
  - i. Should availability allow a wholesale storage facility to be paired with generation participating in the retail market?
- e. Should other facility types, like microgrids, be considered at this time or should a storage tariff be the priority?

### **Response**

- a. A facility that meets the criteria governed by ISO-NE should be eligible for service under a WDS.
- b. The Company is interpreting this question to mean the technology type of the energy storage resource but would provide further response if there's a different intended meaning for "type".

The program should not define or limit a commercially viable solution. If the energy storage resource meets the statutory definition of an energy storage system, it should be eligible for service.

R.I. Gen. Laws § 39-33-1: (2) "Energy storage system" means any technology capable of converting electrical energy to some form of stored energy for reconversion to electrical energy at a later time.

From the Company's EDS perspective, there is no impact, as long as the "type" charges and discharges to the EDS and can be metered.

- c. The Company agrees that an energy storage resource has the unique capability of performing multiple functions and the ability to time shift energy, however, the characteristics of appearing as load to the EDS or appearing as generation to the EDS are not unique. The cost of charging would be akin to the cost of a residential, commercial, or industrial customer depending on the rating of the system. The similarities to existing rate classes can be leveraged along with the consideration of the value provided during each function to design a compensation structure within an existing rate.
  - i. The characteristics of appearing as load or appearing as generation are not dependent on where the energy storage connects electrically (i.e. whether it connects to the distribution system or to the transmission system). The design and usage of the energy storage system may be different depending on where it connects electrically (i.e. how the battery is dispatched).
  - ii. N/A
- d. Regarding co-located configurations, the tariff availability should not be dependent on concurrent enrollment in net metering, Renewable Energy Growth, or other programs or tariffs. In other words, the tariff availability should not depend on nor prohibit concurrent enrollment provided that concurrent enrollment would not result in over-compensation.
  - i. The Company interprets the term paired to have the equivalent meaning as co-located. If a DG is participating in the retail market, that would imply that it would be distribution interconnected and thus could not be co-located with a wholesale interconnected storage facility.



- e. Please refer to the response in part C of Applicability for the Interconnection Framework Prompt.

**Prompt**

2. Charges

- a. Once the interconnection costs for a storage facility have been incurred, do storage facilities generally create ongoing costs to the distribution system?
- i. Operations costs?
  - ii. Maintenance costs?
  - iii. Ongoing capital investment? If so, related to what (growth, modernization, asset condition, etc.)?
- b. Do responses to part a on cost causation depend materially on any of the following:
- i. Wholesale versus retail participation,
  - ii. Metering/wiring configuration,
  - iii. Whether the interconnection relies on existing distribution system capacity,
  - iv. Timing of charging and discharging,
  - v. Electrical location of the facility,
  - vi. Something else?
- c. All retail customers are assessed certain mandatory charges per various laws. Are there any configurations under which storage connected to the distribution system would or should be able to avoid those charges?<sup>9</sup>

**Response**

- a. Once the interconnection costs for a storage facility have been incurred, the facility could create ongoing costs to the distribution system as described in parts (i.), (ii.), and (iii). In the far future when there is a higher level of ESS penetration and accumulation, there could be added operational costs to coordinate dispatch. Managing the ESS along with other grid modernization drivers can result in capital investments. Depending on how the ESS schedules are designed can either increase the rate of capital investment as with unconstrained battery schedules or defer capital investment as with constrained schedules.

- b. Timing of charging and discharging (iv.) the electrical location of the facility (v.) and whether the interconnection relies on existing distribution system capacity (iii.) have the most material impact on costs. Another factor (vi.) that could materially impact costs would be the ESS ability to perform VAR support.
- c. Storage should be configured such that charges are not avoided. For example, the full import for charging should be measured rather than the net of the import and export.

**Prompt**

4. Other

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

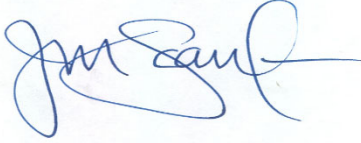
**Response**

None identified at this time.

Certificate of Service

I hereby certify that a copy of the cover letter and any materials accompanying this certificate was electronically transmitted to the individuals listed below.

The paper copies of this filing are being hand delivered to the Rhode Island Public Utilities Commission and to the Rhode Island Division of Public Utilities and Carriers.



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Joanne M. Scanlon

December 20, 2024

Date

**Docket No. 24-34-EL-TC & I – Public Utilities Commission - Development of Tariffs Applicable to Energy Storage Systems Connected to the Electrical Distribution Systems  
Service List updated 12/4/2024**

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