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**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**

Dear Ms. De La Rosa:

On behalf of Oak Square Partners (“OSP”), enclosed are OSP’s comments for filing in reference to Docket No. 24-34-EL. Our comments are in italics and 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 appreciate the opportunity to comment.

Very Truly Yours,

A handwritten signature in blue ink that reads "John Typadis".

John Typadis  
Principal  
Oak Square Partners

## Stakeholder Prompts for an 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 distribution system is any RI Energy-owned facilities including transformers, wires, poles, etc. that service retail customers. This includes subtransmission-level assets and infrastructure that serve retail customers. Purpose-built interconnections that serve no other distribution customers are distribution facilities and could be used to serve additional customers in the future. It does not 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?

*Yes.*

- 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.

*Focus should be on storage.*

### 3. Study Process

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

*Storage-specific screens should determine the level of study. These levels of study should be established in the tariff such that their duration and cost are transparent and predictable.*

- 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?

Yes.

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

*In addition to studying with restriction and/or studying subject to operation restrictions/guidelines, a study or alternative study should also take into account participation in the desired incentive program (e.g., Connected Solutions, Non-Wires Alternatives, etc.)*

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

*In addition to size, location, and configuration, anticipated benefits provided to RI Energy's distribution system should be taken into account. Emphasis should be on minimizing system modifications and aggregate interconnection cost.*

#### 4. Costs

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

*Yes. The current schedule of payments for straightforward interconnections is fair.*

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

*Longer than normal interconnections should also have a correspondingly extended payment timeline.*

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

*See response to 4 (b) below.*

- 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?

*The current schedule is sufficient for now.*

- 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).

*If a project participates in a Demand Response or Non-Wires Alternatives program that provides benefits to RI Energy, reduces stress on existing infrastructure, or allows RI Energy to avoid expensive distribution system upgrades, no system upgrades should be required.*

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

*Storage projects enrolled in RI Energy incentive programs, specifically Demand Response and Non-Wires Alternatives, are providing benefits to the distribution system. Participation 1) gives RI Energy dispatchable control to distributed resources in Demand Response and 2) allows RI Energy to avoid significant infrastructure modifications and upgrades, both at no capital expense to RI Energy.*

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

### **1. Availability**

- a. What types of energy storage resources should be eligible for service under a WDS?

*Energy storage resources eligible to be enrolled in the wholesale market 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?

*All 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?

*Yes. Time of Use rates would be most appropriate for energy storage resources on a retail service tariff.*

- i. Are these characteristics different for similarly designed wholesale and retail storage systems?

*No.*

- ii. If storage facilities should be considered a distinct class of customers, should that apply to standalone, generation-sited, or other configurations?

*It should apply to all configurations.*

- d. Should the tariff availability depend on concurrent enrollment in net metering, Renewable Energy Growth, or other programs or tariffs?

*No.*

- 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?

*The storage tariff should be the priority.*

## 2. Costs

- a. Once the interconnection costs for a storage facility have been incurred, do storage facilities generally create ongoing costs to the distribution system?

*Theoretically, energy storage resources participating in an incentive program would produce benefits to the distribution system that are equal to if not greater to the 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: Wholesale versus retail participation,

*Theoretically, energy storage resources participating in an incentive program would produce benefits to the distribution system that are equal to if not greater to the costs to the distribution system.*

- i. Metering/wiring configuration,
  - ii. Whether the interconnection relies on existing distribution system capacity,
  - iii. Timing of charging and discharging,
  - iv. Electrical location of the facility, or
  - v. 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?
4. Other: What other main elements can stakeholders identify that do not fall within the basic tariff structure provided above?