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**VIA ELECTRONIC MAIL**

March 26, 2025

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 **bold** and are in response to the Docket 24-34-EL Storage Workshop #4 presentation on March 14, 2025.

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 Comments in Response to Docket 24-34-EL Storage Workshop #4 Presentation on March 14, 2025

### 1. Availability/Eligibility

- a. What customer types/configurations should be allowed to discharge? **All**
- b. Should there be a limit on how much or what time ESS can be discharged? **No**
- c. Does it matter what "type" of power is discharged? Does it vary by tariff or program? **No - renewable or grid energy can be discharged**

### 2. Charges/Rates

- a. What should ESS be paid for discharge? Should it have a time varying component? **A time varying component, e.g., Time-Of-Use, is reasonable so long as it is clear. The pay-for-discharge rate would act as a natural incentive.**
- b. What should ESS pay when it is charging? **The applicable tariff rate. The pay-for-charge rate would act as a natural disincentive. Even additional disincentives to prevent charge during peak demand times would serve a purpose (so long as they don't conflict with incentives, should they exist, to charge during peak periods).**
- c. Does the configuration dictate what the ESS pays and is paid? **No**
- d. **Other:**
  - i. **It is not clear why an ESS cannot export through the REG production meter. In interconnection-constrained areas, an ESS could allow new REG projects to hold back kWh and export them later**
  - ii. **Adders for distressed circuits would incentive ESS installation in areas that would benefit from ESS**

### 3. Terms & Conditions

- a. How do customers establish eligibility for the retail tariff? **Size (see suggested limit below), feasible interconnection (ISRGD or ISA)**
- b. How to establish that specific types of discharge are eligible to receive compensation **All discharge should be eligible to receive compensation**
- c. What are the appropriate metering requirements?
- d. Should there be any size limitations for eligibility for the retail tariff? **5 MW**
- e. **Other:**
  - i. **What compensation should storage be eligible for?**
    1. **Discharging**
    2. **Charging - to alleviate impact of high levels of solar generation (duck curve)**
    3. **Demand Response**
    4. **"Clean Peak"**
    5. **ESS should be able to participate in all streams and stack compensation (assuming incentives are properly designed)**
  - ii. **Comments from Slide 15 discussion**

1. **What is the use case for standalone storage on the distribution system?**
  - a. **Solving distribution system level issues**
    - i. **Alleviating impact of high solar penetration**
    - ii. **Demand response - discharging during high demand periods helps to offset strong demand, even if not behind the meter of load/demand**
    - iii. **Non-Wires Alternatives**