Andrew S. Marcaccio, Counsel
PPL Services Corporation
AMarcaccio@pplweb.com

280 Melrose Street
Providence, RI 02907
Phone 401-784-4263

Rhode Island Energy™
a PPL company

March 26, 2025

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 for filing in the above-referenced docket are the Company's comments in response to the discussion at the PUC-Led Workshop on March 14, 2025, regarding the development of a Retail Storage Tariff.

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

Very truly yours,

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 current impressions of the stakeholder prompts. Through continued collaboration in the PUC-led workshops the Company expects to engage, evolve, and modify considerations as appropriate.

Stakeholder Prompts for a Retail Tariff: Stakeholder Workshop on March 14, 2025

Prompt:

Availability/Eligibility

- What customer types/configurations should be allowed to discharge?
- Should there be a limit on how much or what time ESS can be discharged?
- Does it matter what "type" of power is discharged? Does it vary by tariff or program?

Response:

All customer types/configurations of ESS should be allowed to discharge if the discharge operation complies with the Company's operational parameters for ESS.[1]

There should be a limit on how much and what time the ESS can be discharged, subject to operational parameters. This would establish a MW limit on feeder sections of specific voltage classes. If the ESS proposes to operate outside of the established timeframe, then the interconnection may be subject to additional System Modification costs.

In the context of this question the Company understands "type" of power to mean renewable energy vs. grid energy. The type of power discharged should depend on the purpose of this ESS retail tariff. If the purpose is to ensure a fair exchange of money between charge and discharge as the storage performs a specific function (e.g. charges or discharges within a timeframe specified by the Company for grid support), then the "type" of power should not factor in; except in instances when paired with existing renewable programs such as REG or NEM then the intent of those programs must also be met. If the purpose of this ESS retail tariff also includes reducing carbon emissions, then charging/discharging grid energy should be limited and/or prohibited.

[1] The Company would propose to develop operational parameters for ESS that defines the technical specifications and operating requirements such as but not limited to a charge/discharge schedule, dispatch limits and ramp rates.

As specified on Slide 7 from the Stakeholder Workshop, three scenarios were identified where discharge could occur for storage paired with Net Metering:

1) ESS can export, but ESS only charges from renewable facility.
2) ESS can export, but ESS charges from renewable facility and electric grid.
3) ESS can export, but charges only from electric grid.

The Company agrees that number 1 could be permitted and could be done behind the net meter. Numbers 2 and 3, discharge should be further evaluated to determine if charging from the electric grid and discharging through the net meter would meet with the purpose and definitions stated in the Net Metering statute and tariff. Certain scenarios may require separately metered solutions.

Prompt:

Charges/Rates

- What should ESS be paid for discharge? Should it have a time varying component?
- What should ESS pay when it is charging?
- Does the configuration dictate what the ESS pays and is paid?

Response:

By leveraging existing rates that complement the use of storage, a fair exchange would be to pay the ESS the per-kWh rate for discharge that it is charged for charging and to charge the ESS the per-kWh rate from the appropriate existing rate class (akin to the charge for load). If ESS is charged from a renewable that is participating in REG or NEM, then the discharge should align with the REG or NEM rate.

The Company supports the idea of a time-varying component; however, the development of such would be tied to the valuation of the service provided by the ESS to the Electric Distribution System (EDS). For example, there is more value to the grid to discharge during peak loading times and less value to the grid to discharge during light loading times. The Company supports the concept of compensating for the value the ESS provides to the EDS during charge and discharge; however, understands that may be beyond the scope of the retail tariff parameters as indicated on Slide 6, where designing the rate for importing and exporting power is more aligned with design to support storage with the development of incentives or compensation programs. Such incentives would provide economic value to interconnecting ESS to drive desired behavior

that would solve EDS issues. The Company would need to analyze and consider the rate impact of this type of proposal.

Prompt:

Terms & Conditions

- How do customers establish eligibility for the retail tariff?
- How to establish that specific types of discharge are eligible to receive compensation?
- What are the appropriate metering requirements?
- Should there be any size limitations for eligibility for retail tariff?

Response:

ESS that complies with the Company's interconnection tariff R.I.P.U.C No. 2258 Standards for Connecting Distributed Generation (DG) and meets the operational parameters requirements should be eligible for the retail tariff. The Company would need to understand the ESS system size and operating schedule.

ESS discharge should be eligible to receive compensation if it meets the operational parameters and it is not already receiving compensation under a different program unless it is for a different objective.

The rate design and the system configuration will dictate specific metering requirements; for example, the quantity of meters (whether something needs to be separately metered) and the meter specifications (for example an interval meter, net meter, etc.).

Size limitations for eligibility would be set forth by the operational parameters.

Prompt:

General Questions

- Per the previous slide, should storage "live" within existing tariffs or have a standalone tariff? If both, what elements should be in a standalone rate that make it distinct?

- If layered on top of another program, what programmatic changes would be appropriate?

Response:

The Company believes that creating a single general discharge tariff for ESS that enables framework design to overlay seamlessly onto existing tariffs would be the most efficient option.

If layered on top of another program, programmatic changes may be appropriate. For example, the Net Metering program does not define specific rules for pairing storage. It should clearly state what is permitted. There are existing rules in the REG program relating to storage that state that,

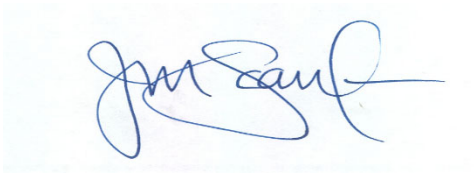
"Energy storage systems (ESS), such as electro-chemical batteries, that can store and release electrical energy, may be co-located with RE Growth qualifying projects. When located behind-the-meter of a customer and able to charge from the electric power system, ESS must be configured in a manner that they cannot export through the RE Growth production meter. When configured to charge directly from the RE Growth system, ESS must be configured so that any energy used for back-up supply purposes is not measured by the RE Growth production meter."

Tariff language should clearly reflect the ability for REG customers to moderate solar output as described on Slide 12.

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.



Joanne M. Scanlon

March 26, 2025
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 3/19/2025

Name/Address	E-Mail Distribution	Phone
The Narragansett Electric Company d/b/a Rhode Island Energy Andrew Marcaccio, Esq. Celia B. O'Brien, Esq. 280 Melrose Street Providence, RI 02907	AMarcaccio@pplweb.com; COBrien@pplweb.com; JHutchinson@pplweb.com; JScanlon@pplweb.com; JWBausch@pplweb.com; SBriggs@pplweb.com; ACastanaro@pplweb.com; JOliveira@pplweb.com; CAGill@RIEnergy.com; ERussellSalk@RIEnergy.com; EMcCord@RIEnergy.com; pblazunas@ceadvisors.com lschafer@ceadvisors.com	401-784-4263
Division of Public Utilities Margaret L. Hogan, Esq. Mark Simpkins, Esq.	Margaret.L.Hogan@dpuc.ri.gov; Mark.A.Simpkins@dpuc.ri.gov; Christy.Hetherington@dpuc.ri.gov; John.Bell@dpuc.ri.gov; kyle.j.lynch@dpuc.ri.gov; leo.wold@dpuc.ri.gov; Al.Mancini@dpuc.ri.gov; Al.Contente@dpuc.ri.gov; Machaela.Seaton@dpuc.ri.gov;	401-274-4400

	Ellen.Golde@dpuc.ri.gov;	
	mikebrennan099@gmail.com;	
	gboothpe@gmail.com;	
	Joel.Munoz@dpuc.ri.gov;	
File an original & 9 copies w/ PUC: Stephanie De La Rosa, Commission Clerk Public Utilities Commission 89 Jefferson Blvd. Warwick, RI 02888	Stephanie.DeLaRosa@puc.ri.gov;	401-780-2017
	Alan.Nault@puc.ri.gov;	
	cynthia.wilsonfrias@puc.ri.gov;	
	Todd.Bianco@puc.ri.gov;	
	Theodore.Smith.CTR@puc.ri.gov;	
	Kristen.L.Masse@puc.ri.gov;	
Interested Parties:		
Green Development LLC Matthew Sullivan Cameron Major Matthew Ursillo Hannah Morini	ms@green-ri.com;	
	clm@green-ri.com;	
	mu@green-ri.com;	
	hm@green-ri.com;	
Kearsarge Energy Paige Asbury Sam Feigenbaum	pasbury@kearsargeenergy.com;	
	sfeigenbaum@kearsargeenergy.com;	
Green Energy Consumers Alliance Tina Munter Amanda Barker Larry Chretien	Tina@greenenergyconsumers.org;	
	Amanda@greenenergyconsumers.org;	
	Larry@greenenergyconsumers.org;	
Blake Elder	regtrackdsire@gmail.com;	
Bill Hilliard	Bill@BlueSkyUtility.com;	
Daniel Cooney	dcooney@nugencapital.com;	
Matt Shortsleeve	mshortsleeve@solect.com;	
Tim Roughan	roughan61@charter.net;	
Nancy Chafetz	Nancy.Chafetz@cpowerenergy.com;	
Stakeholders: Interconnection		
Hillview Environmental LLC Charles Tyce	ctyce@hillviewenvironmental.com;	
Rhode Island Commerce Corps. Karen Stewart	karen.stewart@commerceri.com;	
Stakeholders: Terms and Conditions & Interconnection		
Revity Energy LLC And Affiliates Nicholas L. Nybo	nick@revityenergy.com;	

Energy Development Partners, LLC Frank Epps Alejandro Trevino	frank@edp-energy.com; alejandro@edp-energy.com;	
RENEW Northeast Inc. Francis Pullaro	fpullaro@renew-ne.org;	
Northeast Solar & Wind Power, LLC Vito Buonomano	vitob@neastsolar.com;	
Conservation Law Foundation (CLF) Jamie Rhodes	jrhodes@clf.org;	
Advanced Energy United Kat Burnham	kburnham@advancedenergyunited.org;	
Sol Power Eric Beecher	eric@solpowersolar.com;	
Oak Square Partners John Typadis Sevag Khatchadourian Demetri Typadis	john@oaksquarepartners.com; sevag@oaksquarepartners.com; demetri@oaksquarepartners.com;	
The Alliance for Climate Transition (ACT) Oliwia D. Krupinska Natalie Hildt Treat Sean Burke Richard Labrecque Mrinmayee Kale Ian Springsteel Greg Hunt	okrupinska@joinact.org; ntreat@joinact.org; sburke@bluewave.energy; rlabrecque@agilitasenergy.com; mkale@newleafenergy.com; ghunt@zpeenergy.com; ispringsteel@gridwealth.com;	
Office of Energy Resources One Capitol Hill, Fourth Floor Providence, RI 02908 Shauna Beland William Owen Karen Bradbury Abigail Hasenfus	shauna.beland@energy.ri.gov; william.owen@energy.ri.gov; Abigail.Hasenfus@energy.ri.gov; karen.bradbury@energy.ri.gov; adam.fague@doa.ri.gov; Christopher.Kearns@energy.ri.gov; steven.chybowski@energy.ri.gov; Nancy.Russolino@doa.ri.gov;	401-724-3600
RI Attorney General Office Nicholas Vaz, Esq. 150 South Main St. Providence, RI 02903	nvaz@riag.ri.gov; mbedell@riag.ri.gov;	
Apex Analytics Matt Nelson Michael Goldman	mattn@apexanalyticsllc.com; michaelg@apexanalyticsllc.com;	