



March 26, 2025

Ms. Stephanie DeLaRose, Commission Clerk  
VIA ELECTRONIC MAIL  
Public Utilities Commission

**Re: 24-34-EL Development of Tariffs Applicable to Energy Storage Systems Connected to the Electrical Distribution Systems**

Dear Ms. DeLaRosa,

The Rhode Island Office of Energy Resources (OER) is pleased to share the following comments below in response to the prompts presented for the March 14, 2025 stakeholder workshop.

So far in the discussions OER has not seen a particular configuration which should be disallowed from discharging. The specific systems allowable are, at present, largely determined by the specific programs a system would operate within, therefore allowance of a customer to discharge should be driven by the interconnection study process and resulting agreement on operation. As was pointed out during the workshop, the effect today of the tariff is likely going to allow existing systems to operate in a way to allow for additional peak demand reduction and load smoothing.

ESS discharge should have the flexibility to operate as needed within the system's program enrollment requirements and the terms of its interconnection. The discussion on this question and the proposal for a system to allow a maximum discharge capacity to be configured suggests that any potential limit be a matter established by agreement between the customer and the utility. One area it may also be worth considering is in a **mechanism for re-assessing those agreements if localized conditions change** (eg. the process for amending a Schedule B established in 23-05-EL).

The "type" of power discharged also seems most clearly designated by the program a system is enrolled in – Net Metered and REG enrolled systems must charge from a renewable generation system. Given the discussion among the stakeholders during the workshop there appears to be little benefit under present rate structures for ESS to charge directly from the grid, and in most instances will be charged from co-located distributed generation. Once TOU rates are enabled in



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Rhode Island, energy type will likely need to be reconsidered within the tariff, or addressed directly within newly implemented programs, if it is found that additional system and operational savings can be achieved to advance state affordability, climate and energy goals through grid charging and discharging.

Outside of enrollment in a particular program – which is likely already accounting for a variety of benefits from ESS – discharge payments should be reflective of the system and operational benefits achieved by discharge, and time variance is a driver of those benefits. If the state reaches a point where standalone systems can effectively operate due to TOU implementation, the benefits should take into account the distribution and transmission impacts of ESS. Ongoing costs should likewise be reflective of the impact of an ESS on the grid and the operations needed to support it (metering, billing, etc) in order to ensure systems can provide a net benefit to the system and ratepayers.

Sincerely,  
William Owen  
Energy Policy and Regulatory Manager