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VIA ELECTRONIC MAIL

August 11, 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 (second set of interconnection responses) are in response to the Docket 24-34-EL Storage Workshop #10 presentation on August 6, 2025.

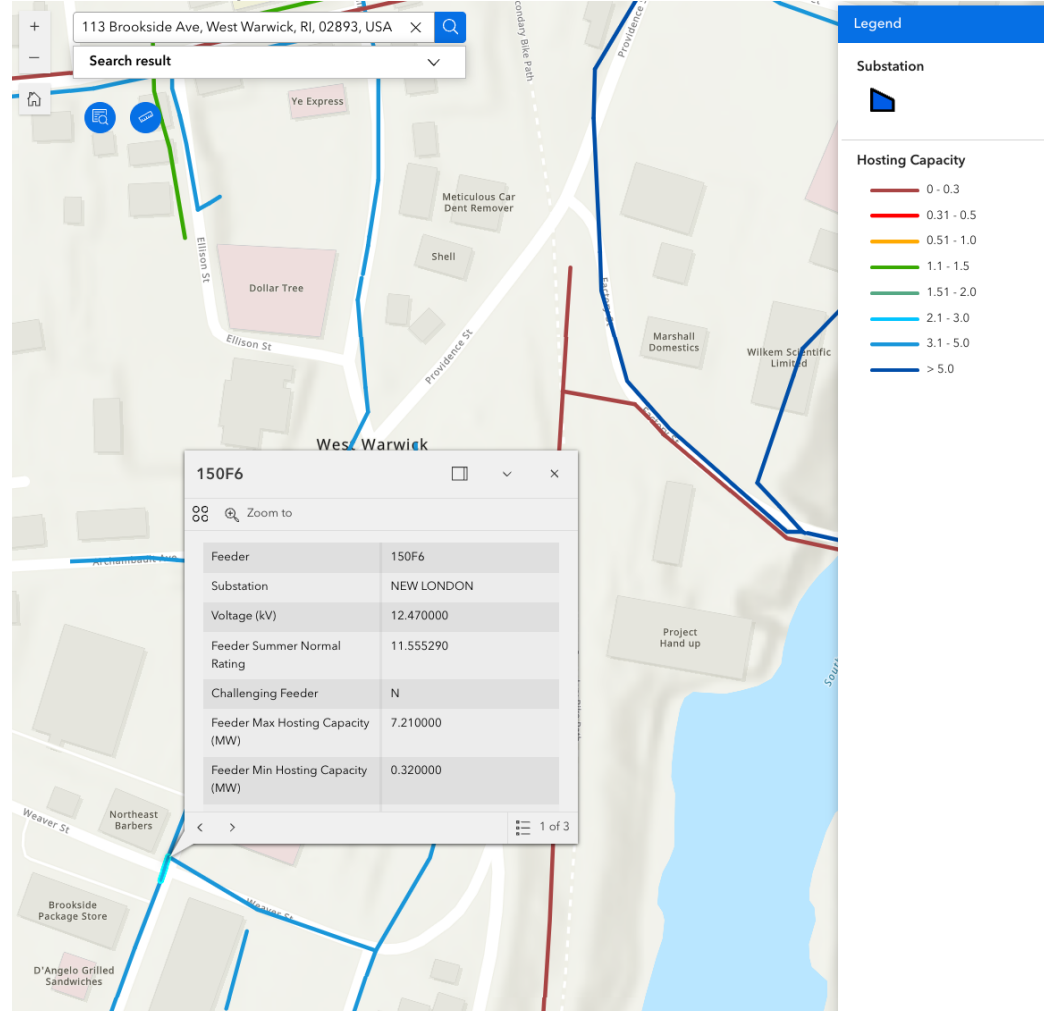
We appreciate the opportunity to comment.

Very Truly Yours,

John Typadis
Principal
Oak Square Partners

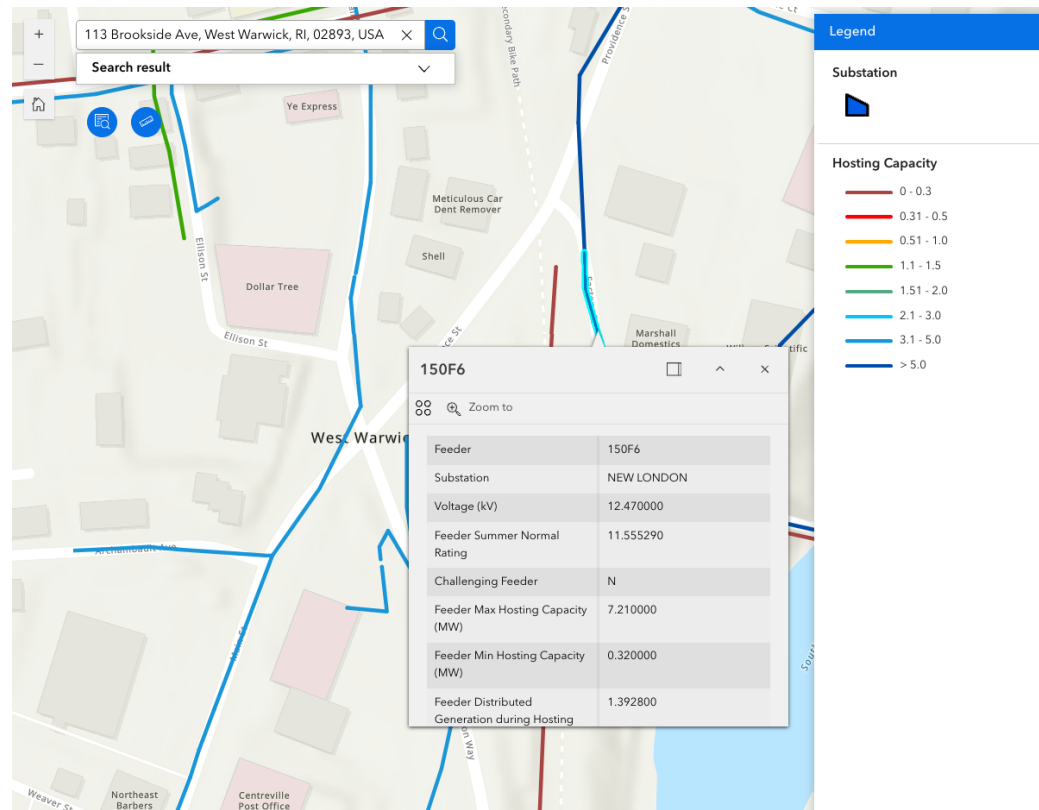
Stakeholder Comments (second set of interconnection responses – *in italics*) in Response to Docket 24-34-EL Storage Workshop #10 Presentation (second set of interconnection responses) on August 6, 2025

- Stakeholder Prompts
 - P.13: Study Process
 - Is there additional data or information you would like to see in the Pre-Application Report (e.g., 8760 data) to inform ESS siting and design?
 - The Hosting Capacity Analysis map is meant to be a helpful tool but it remains unclear how hosting capacity values are visually represented on the map and what the true value of available hosting capacity is on a feeder.*
 - Example: New London feeder 150F6 – see screenshots below:*



Color from the legend indicates 3.1-5.0 MW of available hosting capacity but there is no data in the table that matches with this designation

And



Color from the legend indicates >5.0 MW of available hosting capacity but there is no data in the table that matches with this designation

- **P.24: Study Queues**

- For ESS, what design modifications (e.g., increase in export capacity, extension of operating profile), if any, would be allowable while remaining in the queue? At what point in the process (e.g., pre-impact study, post-impact study) would they be allowable?
 - *Design modifications that yield a feasible interconnection and interconnection service agreement should be allowed.*
- Is there an opportunity to add Group Study processes to the ESS tariff?
 - *The concept of Group Study should be considered if it allows for 1) a less expensive per-project study fee relative to an individual project study fee and 2) a faster, more efficient study timeframe relative to an individual project study timeframe. Both 1) and 2) conditions need to be satisfied. We make this comment taking into account the additional friction associated with a Group Study (consensus and coordination amongst participants).*
 - *Allow for developers/projects involved in Group Studies to connect and form consensus on participation in Group Studies.*

- P. 30: Process
 - Is the process understandable?
 - *It needs to be clearer at application submission which study path is reasonably expected by the project/developer to follow.*
 - Are definitions clear? Are documents clear and easily accessible?
 - Yes.
- P. 39: Timelines
 - *By 20/30 BD Review – thermal threshold analysis should be completed/included in review and provided to project.*
 - *If RIE is proposing to expand timelines in the interconnection process, give project the choice to remove items from the process that do not provide new information or guidance (e.g., screening memo).*
- P.42: Technical Requirements
 - Are there any elements of the existing technical requirements that create unnecessary challenges that should be or could be addressed?
 - *Scenario: Project has submitted its interconnection application in compliance with current ESB requirements (UL Standard 1741 SA). Utility changed ESB requirement to UL Standard 1741 SB while the project was being studied. Change in technical requirements while a project's application is in the middle of study is problematic and some accommodation should be made to projects in this situation to complete study under the technical requirements in place when interconnection application was submitted.*