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VIA ELECTRONIC MAIL

March 13, 2026

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 response to the Docket 24-34-EL Storage Workshop #16 presentation on March 5, 2026.

We appreciate the opportunity to comment.

Very Truly Yours,

John Typadis
Principal
Oak Square Partners

Stakeholder Comments in Response to Docket 24-34-EL Storage Workshop #16 Presentation on March 5, 2026

- Issue #1: Eligibility – Rates
  - Trigger Point
    - BESS would apply for a reservation. ISA and site control needed to receive reservation.
      - Interconnection application is too low a threshold (propensity to use interconnection queue to box out other projects)
      - Need for permits is too high a threshold (too much development risk)
    - Once reservation confirmed, BESS would have 24-36 months to reach commercial operation (analogous to REGrowth Program).
      - Critical to have visibility of storage reservations so developers don't waste time chasing a reservation at same substation or on same feeder where there is only room for one project
    - Commercial Operation Date (COD – when BESS is energized and commercially operational) would start the clock on the rate eligibility term.
  - Term Structure – needs to be consistent and predictable. Rate re-evaluation every/every other rate case period would not provide consistency and predictability for financing.
    - Minimum – 10 years from COD
    - Target – 20 years from COD
  - Planning Cycle & Notice
    - Analogous to Clean Peak DCM – Utility should determine if an area is constrained (load- and/or generation-constrained) and also determine the kW/MW needed to solve the constraint. That amount should shared with public.
      - Constraint will continue to exist if that amount of kW/MW is not installed/operating.
      - Constraint will not continue to exist if that amount of kW/MW is installed/operating.
    - Utility should evaluate the entire territory and define all constraints (load and generation)
  - What's Locked
    - Rate/Term
    - Constraint/Congestion Status
  - What Flexes
    - For predictability, rates would ideally not flex
    - Flexing rates amount to merchant rates, which are more difficult to finance

        - Understanding that rates must flex through regular rate cases, we would suggest the following:
            - Rate floor – rates can go no lower than this level – provides some certainty
            - Rate cases at extended intervals: every 5 years/7years/10 years (if possible)
            - Setting rates during rate cases with predictable steps up or steps down
            - Setting rates during rate cases for terms longer than rate case cycle (e.g., if rate case is every 5 years, set rates for next 10 years)
                - Rates would apply to a BESS reservation date
    - Size
        - Minimum: none
        - Maximum: 5-10 MW
- Issue #2: Defining Constrained Locations
    - Utility should be clear about constraints being load-driven or generation-driven and provide proper value signal
        - Utility should be clear if they want both types of constraints solved or one type of constraint solved more than the other type of constraint
            - Should also be clear what the rates are to solve each type of constraint
    - Level
        - System level congestion should be measured at feeder and substation level
            - OK if each level has a different value signal
    - Threshold Type
        - Absolute
    - Data & Metric
        - Both load-driven and generation-driven
- Issue #3: Rate Design and Cost Allocation
    - Charge Side
        - Time-of-Use – Off-peak, Peak, Super Peak (adjusted for season)
    - Discharge Side
        - Time-of-Use and
        - Demand-based
            - Credit should reflect value to reducing overall system/substation/feeder demand
- Issue #4: Constrained Location Value Signal
    - Additional Value Signals
        - Location – Constrained or not constrained

        - Time of Day – Peak, Super Peak, “Clean Peak” (e.g., Massachusetts – high levels of solar generation)
        - Resiliency – if paired with solar or helps alleviate issues of strong solar generation
    - Mechanism
        - Feeder/Substation multipliers – for load, generation, or both
- Issue #5: Program Alignment
    - Proposed Complementary Stacking Rate Structure
        - System Rate (base rate)
        - Constrained Rate Adder (load or generation or both)
        - Time of Day Rate Adder
        - Resiliency Adder (if with solar or on a feeder/at a substation with strong solar generation)
    - For consideration
        - Eligibility for stand-alone BESS to participate in Connected Solutions
            - Stand-alone BESS should be eligible to participate so long as they are not being double-compensated and
                - E.g., can received Connected Solutions PBI but not Time-of-Use rate while performing in Connected Solutions
            - Important to avoid redundant stacking