

**STATE OF RHODE ISLAND AND PROVIDENCE PLANTATIONS
ENERGY FACILITY SITING BOARD**

In re: Petition of Energy Storage Resources, LLC for a Jurisdictional Determination Pursuant to R.I. Gen. Laws § 42-35-8 : : **Docket No. SB-2019-02**

**ENERGY FACILITY SITING BOARD'S
SECOND SET OF DATA REQUESTS TO
ENERGY STORAGE RESOURCES, LLC**

EFSB DATA REQUEST NO. 2-1:

Is the facility owner subject to any local or state taxes on the business, property, sales, or use associated with the facility and its products? If so, please briefly explain why the facility is subject to each tax.

RESPONSE NO. 2-1:

It is Energy Storage Resources LLC's ("ESR") understanding that the facility will be subject to both local and state taxes. State income taxes are also assumed to apply to the net income generated from the operation of the facility.

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Response prepared by or under the supervision of
Alex Fraenkel

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In re: Petition of Energy Storage	:	
Resources, LLC for a Jurisdictional	:	Docket No. SB-2019-02
Determination Pursuant to	:	
R.I. Gen. Laws § 42-35-8	:	

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EFSB DATA REQUEST NO. 2-2:

Is the facility owner subject to any local or state tax exemptions business, property, sales, or use associated with the facility and its products? If so, please briefly explain how the facility is qualified to claim each exemption.

RESPONSE NO. 2-2:

There are no known local or state tax exemptions. ESR has the option to negotiate a Payment in Lieu of Taxes (PILOT) program with the Town of South Kingstown, however no discussions regarding a PILOT program for this project have taken place.

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EFSB DATA REQUEST NO. 2-3:

Please explain if the applicant's understanding is that the term "megawatt" is a unit describing a rate of electric energy transfer rather than a unit describing an amount of electrical energy.

RESPONSE NO. 2-3:

Yes. ESR's understanding is that the term "megawatt" is a unit describing a rate of electrical energy transfer rather than a unit describing an amount of electrical energy. The unit describing an amount of electrical energy is a "megawatt-hour."

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EFSB DATA REQUEST NO. 2-4:

Is the facility capable of bringing into existence a rate of electric energy transfer equal to or greater than forty megawatts?

RESPONSE NO. 2-4:

As noted in ESR's Petition for Declaratory Order, Merriam-Webster Dictionary defines generation as "to bring into existence." The facility is not capable of bringing energy into existence. The facility is designed and capable of charging and discharging at variable rates up to 180 MWs. This means the facility can pull power from the grid or discharge power back onto the grid at any power rating from 0 to 180 MWs. The facility's ability to charge and discharge at variable power ratings for different durations will be governed by how much energy is stored in the facility at the specific time interval.

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EFSB DATA REQUEST NO. 2-5:

Does the following equation correctly relate the amount of energy output by a facility that is generating constant power over some time period?

$$\text{Energy} = \text{Power} * \text{time}'$$

RESPONSE NO. 2-5:

The above equation correctly relates the amount of energy output by a facility that is generating constant power over some time period. The above is the equation for Energy (MWh), which equals Power (MW) multiplied by a time interval (h, s).

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EFSB DATA REQUEST NO. 2-7:

The petition describes energy storage. If power is a rate of energy transfer, please explain if and how power is stored.

RESPONSE NO. 2-7:

Power is not stored, energy is stored. Power describes a specific rate of energy transfer (equivalent to Liters of water per minute). Energy is what is stored, or a total amount of MWs which would be discharged over an hour interval (MWhs, Liters of water).

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EFSB DATA REQUEST NO. 2-8:

In response to EFSB 1-15, the Petitioner explained that the facility is designed and capable of charging and discharging at a power of 180 megawatts. Is the facility also capable of discharging at a higher power than the rate at which it was charged? For example, can the facility charge at a power of 100 MW, and later discharge at a power of 150 MW? If so, what are the technical limitations to this charge/discharge difference, if any.

RESPONSE NO. 2-8:

The facility is designed and capable of charging and discharging at variable rates up to 180 MWs. This means the facility can pull power from the grid or discharge power back onto the grid at any power rating from 0 to 180 MWs. The facility's ability to charge and discharge at variable power ratings for different durations will be governed by how much energy is stored in the facility at the specific time interval.