

Rhode Island Office of Energy Resources
One Capitol Hill, 4th Floor
Providence, RI 02908



STATE OF RHODE ISLAND
**OFFICE OF
ENERGY RESOURCES**
Commissioner Carol J. Grant

July 15, 2019

Kathleen Mignanelli, Coordinator
Energy Facility Siting Board
89 Jefferson Boulevard
Warwick, Rhode Island 02888

Re: Docket SB-2019-02 – Petition of Energy Storage Resources, LLC

Dear Ms. Mignanelli:

The Rhode Island Office of Energy Resources (“OER”) respectfully submits these comments in Docket SB-2019-02 regarding the Petition for Declaratory Order from Energy Storage Resources, LLC (the “Petition”). OER concurs with the assessment from the Division of Public Utilities and Carriers (“DPUC”), which concludes that energy storage facilities cannot be interpreted as a use within the definition of a major energy facility, and therefore the Energy Facility Siting Board (“EFSB”) has no jurisdiction over the energy storage facilities in the Petition.

We want to additionally express the important siting considerations that local jurisdictions are uniquely suited to address. Such considerations include how the municipality defines the energy storage system in its zoning use table, requirements for minimum distance from the property line, and buffers or screening to meet local aesthetic standards, among other considerations. Municipalities are best suited to ensure siting and zoning ordinances for energy storage facilities are consistent with local priorities and aligned with municipal values.

Our team is available to assist municipalities with technical support and through making connections between municipal staff and subject matter experts, as needed. We encourage municipalities to define energy storage facilities within zoning ordinances and ensure key local stakeholders are trained in relevant codes and safety protocols. Energy storage technology is an important tool in the long-term health of a modern power system. We look forward to the growth of this sector in Rhode Island and intend to take deliberate steps toward its success.

Sincerely,

A handwritten signature in blue ink, appearing to read "N. Ucci".

Nicholas S. Ucci
Deputy Commissioner