



STATE OF RHODE ISLAND

# OFFICE OF ENERGY RESOURCES

January 30, 2020

Chairperson Margaret E. Curran  
Commissioner Marion Gold  
Commissioner Abigail Anthony  
Rhode Island Public Utilities Commission  
89 Jefferson Boulevard  
Warwick, Rhode Island 02888

**Re: Docket #5000 - Investigation into the Treatment of Storage**

Dear Commissioners:

The Rhode Island Office of Energy Resources (OER) respectfully submits these comments in response to the Public Utilities Commission's Notice to Solicit Comments issued on January 2, 2020 under Docket #5000, an Investigation into the Treatment of Storage as an Electric Distribution System Resource.

OER appreciates the Commission's recognition that storage can play an important role in advancing the state's clean energy policy goals. Over the coming months, we look forward to engaging with regulators and stakeholders as this discussion unfolds. To ensure that collective engagement and resource commitments are most effectively leveraged, we ask that the Commission first provide additional clarity on what outcomes it hopes to achieve through its investigation and in what forms. Additional context regarding what specific decisions, rulings, and/or orders might result from this effort may constructively narrow the breadth of conversation and better inform stakeholders as they develop inputs. Such detail would enable OER and others to suggest relevant topics more strategically, provide focus for stakeholder engagement, and ensure that the investigation results in actionable guidance that can appropriately animate Rhode Island's storage market.

Furthermore, OER has concerns regarding the suggested inclusion of distributed generation within the scope of this docket. While distributed generation paired with storage may need to be examined within this Docket, opening a discussion of distributed generation more broadly may send confusing market signals to developers and other stakeholders and inadvertently impact momentum across the marketplace. OER encourages the Commission to clarify that the scope of the docket covers only systems that include storage (whether paired with distributed generation or stand-alone systems).

Finally, as this work unfolds, OER recommends that the Commission issue a procedural schedule with dates for technical sessions, open meetings, and other events under this docket, as well as agendas for each so that all parties may engage strategically and properly expend resources as required.



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Thank you for your consideration.

Respectfully,

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

Nicholas S. Ucci  
Acting Energy Commissioner