Alliance for Climate Transition ("ACT") and Solar Energy Industries Association ("SEIA")
Docket No. 26-08-05
Response to Interrogatory CAE-45
Date of Submission: August 28, 2026
People Responsible: Tim Snyder (ACT) & Ruthie DeWit (SEIA)

Question:

CAE-45 Identify each state or electric utility that currently offers a bidirectional retail tariff substantially similar to the bidirectional retail TOU tariff proposed. For each example, identify: (a) the utility; (b) the jurisdiction; (c) the tariff name; (d) the year implemented; and (e) any publicly available evaluation of its performance.

Response:

The Joint Commenters identify below the closest analogues to the tariff discussed in this proceeding.

The Joint Commenters apply the following criteria in identifying substantially similar tariffs. A substantially similar tariff would provide retail service to a standalone front-of-the-meter storage resource; would differentiate import charges by time period; would provide compensation for export to the distribution system; and would be established as a tariff of general applicability rather than through a bilateral contract with an individual resource. While no tariff currently in effect meets all of these criteria, each example below shares one or more of them, and the operating examples demonstrate that the load-reducer model produces measurable savings.

Example 1: Rhode Island Energy (in development)

(a) Rhode Island Energy. (b) Rhode Island. (c) None finalized. (d) Not implemented. (e) None.

Since 2024 the Rhode Island Public Utilities Commission has overseen a stakeholder process to develop a retail rate class for standalone distribution-connected storage in Docket No. 24-34-EL, with Rhode Island Energy to administer the resulting tariff.[1] The Division of Public Utilities and Carriers described the preliminary design in March 2026 as comprising a fixed customer charge, generation charges and credits based on hourly wholesale prices, time-varying charges for charging and credits for discharge measured in dollars per kilowatt, and a separate project-specific rider for constrained feeders based on marginal avoided costs and conditioned on performance.[2] This is the closest

[1] Rhode Island Public Utilities Commission, Docket No. 24-34-EL, https://ripuc.ri.gov/Docket%20No.%2024-34-EL
[2] Rhode Island Division of Public Utilities and Carriers, Comments, Workshop No. 16, Docket No. 24-34-EL (Mar. 2026),

analogue in design to the tariff discussed here. It differs in that no tariff has been finalized or implemented, and no performance evaluation exists.

Example 2: West Boylston Municipal Light Plant

(a) West Boylston Municipal Light Plant. (b) West Boylston, Massachusetts; municipal light plant territory. (c) No tariff. Twenty-year shared savings contract with Convergent Energy and Power for a three megawatt, nine megawatt-hour battery. (d) Fully operational May 1, 2026. (e) None to date.

Convergent funded the project without upfront capital from the light plant, and the two share the monthly savings the battery produces. The battery is dispatched to reduce monthly transmission expense and annual capacity expense.[3] This is an operating example of the load-reducer model underlying the proposed tariff. It differs in that it operates under a bilateral agreement rather than a tariff, and in that it is located in municipal light plant territory rather than in the service territory of a regulated electric distribution company.

Example 3: MMWEC and Lightshift municipal storage portfolio

(a) Massachusetts municipal light plants, including Holden, Paxton, Groton, and Wakefield, coordinated through the Massachusetts Municipal Wholesale Electric Company. (b) Municipal light plant territory, Massachusetts. (c) No tariff. Projects operate under the MMWEC and Lightshift community-based energy storage program and individual agreements. (d) Projects came online between 2024 and 2025. (e) Massachusetts Clean Energy Center, Advancing Commonwealth Energy Storage Program, Fifth Aggregated Project Report (2022).

Lightshift develops, owns, and operates the batteries; the municipal utilities host them and use peak shaving to reduce power supply, Regional Network Service, and capacity costs. The program contemplates up to fifty megawatts across MMWEC members.[4] Operating projects include Holden, five megawatts and twenty-two megawatt-hours, operational in 2024; Paxton, three megawatts and nine megawatt-hours, operational in 2024; two three-megawatt batteries in Groton, operational in July and August 2024; and a five-megawatt battery and microgrid in Wakefield, in commercial operation in July 2025.[5] The MassCEC evaluation reports that six municipal light plant resources

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https://ripuc.ri.gov/sites/g/files/xkgbur841/files/2026-03/Workshop%20%2316-%20Division%20Comments.pdf.

[3] Massachusetts Municipal Wholesale Electric Company, *West Boylston Energy Storage* (June 2026), https://www.mmwec.org/wp-content/uploads/West-Boylston-energy-storage-release-6-26.pdf.

[4] Massachusetts Municipal Wholesale Electric Company, *Energy Storage*, https://www.mmwec.org/how-we-are-green/energy-storage/; MMWEC and Lightshift Energy, program announcement (Apr. 2024), https://www.mmwec.org/wp-content/uploads/MMWEC-Lightshift-Release_April-2024.pdf.

[5] *See* MMWEC, Holden project release (Aug. 2024), https://www.mmwec.org/wp-content/uploads/Lightshift_Holden-Ribbon-Cutting-Press-Release_August-2024.pdf; MMWEC, Paxton project release (Nov. 2024), https://www.mmwec.org/wp-content/uploads/Paxton-Energy-Storage-Release-11-7.pdf; MMWEC, Groton

achieved approximately $1.80 million in installed capacity reductions and approximately $2.40 million in Regional Network Service reductions, with more than ninety percent of reported value attributable to those two streams, and that batteries included in the Regional Network Service analysis met eighty-five percent of monthly peaks and captured sixty-six percent of the available demand reduction.[6] This portfolio provides the only performance evaluation among the examples identified, and it indicates that the load-reducer model produces measurable transmission and capacity savings. It differs from the tariff discussed here in the same respects as Example 2.

Example 4: Maine front-of-the-meter distributed energy resources program (in development)

(a) Potentially Central Maine Power and Versant Power. (b) Maine. (c) None. (d) Not implemented; program design due to the Maine Public Utilities Commission by September 30, 2026. (e) None.

Public Law 2025, Chapter 430, Section 14 directs the Governor's Energy Office to consider, in designing a front-of-the-meter distributed energy resources program, the marginal benefit to ratepayers of the time and location of generation, compensation rates specific to resource size and generation type, a compensation model based on the value of distributed energy resources, opportunities for a load reducer program for commercial customers, incentives for storage that provides ratepayer benefits, and necessary changes to utility rate structure, billing systems, data collection, and metering.[7] This is a statutory directive to develop a program design rather than a tariff, and no design has been adopted.

Related program

Massachusetts applies a distribution circuit multiplier under its Clean Peak Energy Standard, increasing the credits a qualifying resource earns on designated circuits based on the load profile and needs of that circuit.[8] While it does not operate as a retail

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project release (June 2025) https://www.mmwec.org/wp-content/uploads/Groton-II-Ribbon-Cutting-Release-06.18.2025.pdf; MMWEC, Wakefield project release (July 2025), https://www.mmwec.org/wp-content/uploads/Lightshift_Wakefield_MMWEC-Press-Release_07.31.2025-1.pdf

[6] Massachusetts Clean Energy Center, *Advancing Commonwealth Energy Storage Program, Fifth Aggregated Project Report* (2022), https://www.masscec.com/sites/default/files/documents/ACES%20DNV%20Fifth%20Aggregated%20Draft%20Report_final_clean.pdf.

[7] Me. Pub. L. 2025, ch. 430, § 14, https://legislature.maine.gov/bills/getPDF.asp?item=8&paper=HP1188&snum=132&; Maine Governor's Energy Office, *Front-of-the-Meter Distributed Energy Resources*, https://www.maine.gov/energy/divisions/planning-and-policy/ftm-der.

[8] Massachusetts Department of Energy Resources, *Clean Peak Energy Standard Notices and Updates*, https://www.mass.gov/info-details/clean-peak-energy-standard-notices-and-updates; 225 C.M.R. § 21.00 *et seq.*

tariff, it establishes that the value a resource provides can be determined from when and where it operates, and is administered alongside wholesale market participation.