Date Filed: August 28, 2026

**Witness: Davis, Edward A**
**Request from: Public Utilities Regulatory Authority**

**Question:**

Explain whether a standalone front-of-the-meter (FTM) energy storage resource that is precluded from participating in wholesale markets could take retail service under any existing time-of-use (TOU) tariff as a new customer and subsequently export energy for compensation to the EDC. If so, identify the applicable tariff(s), explain how such exports would be treated under the tariff, and describe any tariff limitations. If not, explain why not.

**Response:**

This question falls outside the scope of this proceeding, which includes rates for sales by EDCs to standalone FTM storage resources; not rates for sales by FTM storage resources. Also, to the extent that this question seeks legal analysis, the Company is unable to provide legal analysis in an interrogatory response from a non-attorney witness, but the Company would be pleased to provide any requested legal analysis in a separate Legal Brief if PURA issues a Notice requesting Legal Briefs on this topic.

Nonetheless, without waiving its rights, the Company hereby provides the following substantive response to this interrogatory as follows:

The question requires clarification because it states that the FTM storage resource is "export[ing] energy for compensation to the EDC," which is participating in the (FERC-jurisdictional bilateral) "wholesale market," but also claims that the FTM storage resource is "precluded from participating in wholesale markets."

That said, if a standalone FTM energy storage resource wanted to purchase bundled retail energy under any existing EDC time-of-use ("TOU") tariff, it could use an existing general service rate schedule that would be assigned based on service requirements of such resource (for example, Rate 37, Rate 56 or Rate 58).