Date Filed: August 28, 2026

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

Question:

Explain whether any changes to ISO New England market rules or FERC regulations would be necessary before a standalone FTM storage resource could participate under a revenue-neutral retail bidirectional TOU tariff. If so, identify each required change and explain why it is necessary.

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 appears to be asking about changes needed so that a standalone FTM storage resource could use a retail bidirectional TOU tariff, which is assumed to mean a tariff under which a standalone FTM storage resource could buy bundled **power** from an EDC pursuant to state-jurisdictional tariff and resell **power** (and perhaps other services) to the EDC pursuant to a state-jurisdictional tariff. The sale of power by the FTM storage resource in such case is not a retail sale and thus could not be made under a state-jurisdictional retail tariff. No changes are necessary to the ISO New England market rules or FERC regulations to allow a FTM storage resource to sell **wholesale** power to an EDC.

If "participating" under a revenue-neutral retail bidirectional TOU tariff does **not** involve sales of any FERC-jurisdictional service by a FTM storage resource, changes to the ISO New England market rules and/or FERC regulations would not be required.