Date Filed: August 28, 2026

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

Question:

OCC Comments, July 6, 2026, p. 6. Explain whether a standalone FTM storage resource operating solely under a revenue neutral bidirectional retail TOU tariff could create cost shifts between customer classes. If yes, describe the potential cost shifts, explain how they would occur, and describe how they could be mitigated.

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:

A bidirectional retail TOU tariff, i.e., a state-jurisdictional tariff where power is sold by an EDC to a standalone FTM storage resource and power is purchased by such EDC (to resell to its retail load) from the standalone FTM storage resource, could not lawfully exist, as discussed in more detail in Section II.A.2 of Eversource's Written Comments filed on July 9, 2026 in this docket.

Eversource therefore has not analyzed how this type of tariff could be structured to be revenue neutral, avoid cost shifts, or how such cost shifts could be mitigated. However, during the proceedings in Docket No. 25-01-15, analysis performed involving standalone FTM storage resources buying and selling wholesale services indicated that there was a significant gap (under the assumed market conditions at the time), such that a cost-shifting-causing subsidy would be required to be paid to standalone FTM storage resources by retail ratepayers.