Date Filed: August 28, 2026

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

Question:

The Alliance for Climate Transition (ACT), the Solar Energy Industries Association (SEIA), and the Coalition for Community Solar Access (CCSA; collectively, the Energy Storage Industry Commenters) Comments, July 9, 2026, pp. 5–8. Respond to the comments and proposals advanced by the Energy Storage Industry Commenters regarding the development of a bidirectional retail TOU tariff for standalone FTM storage resources. For each proposal with which the EDC disagrees, explain the basis for its disagreement.

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:

As Eversource understands, only a single proposal for a bidirectional tariff was made at the cited pages (5-8) in the Energy Storage Industry Commenters' Commenters. That single proposal was described in detail because it had many components relating to the rates for both purchases by the EDCs and sales to the EDCs of a variety of FERC-jurisdictional and non-FERC-jurisdictional products. One component of the proposal was for the sale of energy to EDCs, for which the rate was the locational marginal price of energy. Because the Commenters' single proposal included this EDC payment to the standalone FTM storage resources for energy under a state-jurisdictional tariff, the entire proposal is not lawful for the reasons discussed in Section II.A.2 of Eversource's July 9, 2026 Written Comments filed in this docket.