August 7, 2026

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# DN 26-08-05 Technical Meeting 1 Front-of-the-Meter Energy Storage

# Agenda

Existing Time of Use (TOU) Rates

TOU Rates for Distributed, Standalone, FTM ESS

Scope: Rates Limited to EDC Retail Sales

# Time-of-Use Rates Already Exist

Existing TOU retail rates:

- Retail rates with TOU pricing are available for all service classes and levels of service (e.g., small, medium and large general service).
- TOU rates have a 2-period time-of-day structure, for transmission, energy supply, and certain public benefits components.
- TOU rate structures apply demand (per kW or kVA) and/or volumetric (kWh) rates, depending on rate component and cost characteristics.

The EDCs understand that there is a desire for different TOU rates that would apply only to a (prospective) class of distribution-connected, standalone, FTM ESS.

**PURA Requests:**

**1. Rate structure**

**2. Alignment with the EDCs' WDATs**

**3. Metering requirements**

**4. Eligibility criteria for participation**

**5. Stakeholder process and timing of such a new TOU rate.**

- Not overly complex to design TOU retail rates for new class.
- Although the WDAT rate is only for distribution service, the EDCs could pursue adopting a similar TOU structure for retail distribution as well as many of the other services that comprise a retail rate (energy supply, transmission, etc).
    - Major considerations are the delivery and energy transaction requirements, cost-of-service, and demand and usage characteristics, associated with service needs of the prospective customer class.
- Metering, billing, and technical and practical considerations are significant factors in developing such rate structures.
    - Metering would align with existing retail metering requirements.
- Eligibility would be limited to distribution-connected, standalone, FTM ESS, as that is what was noticed in proceeding.
- Timing and process may depend on whether WDAT model is used.

# Cautions Noted

The EDCs take seriously the Notice's "cautions" that they maintain appropriate cost allocation and avoid cross-subsidization in developing such retail TOU rates, in light of affordability issues.

# Bi-directional Rate for Power Out of Scope and Encroaches on FERC Jurisdiction

The Notice is very clear that this proceeding is for sales at retail by the EDCs; any sale of power or sale of any other product to the EDCs is not within scope.

PURA specifically asks EDCs to "establish a functional retail rate structure that enables FTM storage resources to *purchase* energy from the EDCs."

**A sale of power (whether energy or capacity) by a standalone FTM ESS to an EDC or other reseller would be FERC-jurisdictional and thus inappropriate for PURA to address in any proceeding.**

# Thanks for listening.

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# Questions