BPL Responses to URCA 2023 Draft Annual Plan

Received via email 13 March 2023

Efficiency Audit

While URCA regulates all PESs, it seems this is only focused on BPL. In addition to a regional comparison, an in-country comparison should be made between all PESs that URCA regulates.

Account Separation Guidelines for Public Electricity Suppliers

URCA must recognize that this will require a significant effort for the PESs and may come at a significant cost that should be passed onto the PES's customer base as a short-term rate adjustment to fund this work and investments needed to make this reporting possible.

Renewable Energy Utility Scale Development

BPL is also awaiting the final revision of the NREL document so that we can move to release our Large Scale Generation - Renewable program to suitably qualified customers.

Battery Storage Integration

BPL is currently implementing its second battery storage solution in the country and looks forward to implementing more in the future. In addition to utility-scale installations, BPL would also want URCA to consider consumer-scale storage solutions, which are becoming mainstream and will become an important grid resource in the future with utility control programs that allow the utility to utilize this storage and that of EVs.