STATE OF CONNECTICUT
PUBLIC UTILITIES REGULATORY AUTHORITY

IMPLEMENTATION OF CLEAN ENERGY SUCCESSOR PROGRAMS	:	DOCKET NO. 26-06-04
	:	
	:	
	:	October 2, 2026

WRITTEN COMMENTS OF THE CONNECTICUT LIGHT AND POWER COMPANY DBA EVERSOURCE ENERGY

The Connecticut Light and Power Company dba Eversource Energy ("Eversource" or "the Company") provides the following Written Comments in response to the Notice of Request for Written Comments ("Notice"), issued by the Public Utilities Regulatory Authority ("PURA") on September 9, 2026, in the above-captioned docket.

I. BACKGROUND

PURA established the above-referenced docket to implement successor programs to the clean energy programs established pursuant to General Statutes § 16-244z. See Public Act No. 26-127, §§ 1(b), 2(a), and 3(a). The proceeding will serve as the official administrative record for the development of successor programs to the Residential Renewable Energy Solutions (RRES) Program, the Non-Residential Renewable Energy Solutions (NRES) Program, and Shared Clean Energy Facility (SCEF) Program.

To facilitate PURA's evaluation of successor programs to the NRES, RRES, and SCEF Programs, on September 9, 2026, PURA issued the Notice, in which PURA requested docket Participants and interested stakeholders to file written comments concerning the below issues by September 23, 2026. This deadline was subsequently extended to October 2, 2026.

II. COMMENTS

1. Multipart Payment Framework for NRES Buy-All and SCEF Successor Programs

Eversource appreciates PURA's interest in further input from the Company and other Stakeholders on the Multipart Payment Framework ("MPF") proposed by Eversource to encourage the deployment of paired solar + storage resources that are better aligned with local and regional resource requirements. Further recommendations on a potential MPF approach are provided in response to PURA's questions below.

a. How the per-kW payment level should be determined and updated;

Public Act No. 26-127 requires that incentives for energy storage systems provide benefits to all ratepayers. Per-kW payment rates should consequently be set at a level that is likely to result in costs that are less than the anticipated benefits, and should be reviewed on an annual basis to ensure payment rates reflect the best available information on resource costs and benefits. The methodologies currently utilized to evaluate the cost-effectiveness of the Energy Storage Solutions ("ESS") Program may be an appropriate initial basis for setting per-kW payment levels. Performance-based incentives for large C&I customers within ESS are currently set at $275 per kW for the first five years of enrollment, dropping to $175 per kW for years 6-10. The ESS C&I Program Benefit Cost Assessment, as reported in the Connecticut Energy Storage Solutions – Year 6 Evaluation, Measurement, and Verification report[1] reports a Connecticut Ratepayer Impact Measure (RIM) of 1.23, indicating the modeled incentive levels are efficiently calibrated to benefit all ratepayers. Incentive levels for the MPF proposal should be separately evaluated, but it is reasonable to expect they could be comparable to performance-based payment rates for ESS.

b. How the targeted period should be determined and updated, and whether the

[1] Docket No. 26-08-05, Joint Compliance with Order Nos. 3 & 8, filed Aug. 3, 2026.

timing should vary seasonally;

The period of 4:00 – 8:00 PM has been referenced previously to illustrate the proposed operation of the MPF proposal and may be a reasonable "default" period. However, Eversource ultimately recommends that the targeted period be included within project-specific program or tariff agreements between the EDC and individual customer and be subject to revision by the EDC within certain limitations and with sufficient notice to the customer. This flexibility will enable the EDC to optimize targeted operation of co-located energy storage with locational requirements on different portions of the electric power system, including requirements that may vary by season. Eversource would welcome the opportunity to collaborate with prospective program participants to develop processes by which operational requirements could be identified, updated, and effectively communicated to both optimize operations and reasonably sustain revenue on which project financing will rely.

c. Whether kW performance payments should be based on the minimum one-hour average discharge over the designated period, or another method;

Batteries that are co-located with solar are expected to benefit electric power system operations by extending the delivery of solar energy through the evening peak. The full benefit of extending delivery of solar energy is expected to be maximized by sustaining dispatch throughout the evening window. For example, a 4-MW / 4-MWh battery that dispatches all 4 MWh of its energy in the first hour of a 4-8 PM window will have nothing left to contribute during the second, third, and fourth hour, and other resources would be required to support demand on the electric power system at those times. This is why the Company proposes compensating customers based on the lowest average hourly dispatch and multiplying it by the per-kW payment rate. In the example provided above, the system owner would receive zero payment since the lowest hourly average dispatch is zero. If that battery were instead to dispatch 1 MWh each hour of the 4-hour

event, the lowest hourly average would equal 1,000 kW and the system owner would receive a payment equal to 1,000 * the per-kW payment rate.

d. Whether MPF participation should require co-located storage to charge exclusively from PV to maintain statutory eligibility for the renewable energy tariff program, and how exclusive PV charging should be verified and enforced;

As discussed in Eversource's prior comments, energy output must be from a Connecticut Class I renewable energy source to be eligible for incentive payments PURA may authorize pursuant to P.A. 26-127. A BESS, on its own, is not a Class I renewable source, but its output could be reasonably classified as eligible for incentive payments if it were exclusively charged by a Class I renewable source. Criteria which establish that all output that received compensation through an MPF structure is from a Connecticut Class I renewable source may also mitigate encroachment on FERC-jurisdiction over energy and capacity sales from FTM resources.

The Company notes that ensuring maximum value from a storage resource requires also optimizing when the resource re-charges. This optimization may vary based on location in the system, but in some cases requiring eligible storage to exclusively charge from co-located PV may minimize infrastructure requirements. A paired resource can utilize the same infrastructure to support export of power both from PV generation and an energy storage system, whereas a storage system that charged from the grid may necessitate the need for additional infrastructure to deliver energy at other points on the electric power system.

Requirements for energy storage systems to exclusively charge from co-located resources have been included in program and tariff designs in other jurisdictions, as well as previously been among criteria for tax credit eligibility. Adherence to any program eligibility criteria should ultimately be the responsibility of the participating customers, but there may be several reasonable approaches to validating eligibility. Periodic reporting or audit requirements of energy storage

operations may be one method. It may also be feasible to mitigate reporting requirements through sizing requirements for paired generation and storage resources that provided confidence that energy storage system operations were appropriately optimized to generation output. Eversource would welcome opportunity for the EDCs to collaborate with prospective program participants on potential verification and enforcement mechanisms.

e. The implications of an MPF compensation structure for solar-only and paired solar and storage project economics;

The MPF compensation structure is intended to provide additional revenue for sustained delivery of energy during periods of peak demand on the electric power system. A solar-only installation is unlikely to sustain a significant amount of output through the full duration of those periods. A solar-only project would therefore not be expected to receive additional payments made on a $/kW basis, but would continue to be eligible for $/kWh compensation available through successor programs.

The goal of the MPF structure is to provide revenue that is both 1) sufficient to support the financing and development of energy storage in parallel with solar generation; and 2) commensurate with the expected benefits of sustained peak period output. Eversource consequently recommends that the MPF structure be exclusively available to FTM resources that are co-located with energy storage. While making $/kW payments available to all resources would be technology-neutral, calculating small or zero-value payments for solar-only resources would expand the administrative requirements of successor programs without likely delivering a corresponding benefit.

f. How bid preferences should be administered within an MPF framework;

Eversource recommends that any bid preference instituted by the Authority should continue to be administered through the competitive solicitation process in substantially the same manner as under the current programs. If the current methodology is retained, bid preferences

would continue to serve as discounts to evaluated $/MWh bid prices. The introduction of an MPF would not, in the Company's view, require a separate bid preference mechanism.

Under the proposed MPF, the solar and storage components of a project would be evaluated through the established competitive solicitation process, with the applicable bid preferences applied to the project's bid in accordance with the rules established by the Authority. The storage payment would then be calculated separately based on the applicable per-kW incentive and the project's demonstrated performance during the targeted period.

This approach would preserve the transparency and consistency of the existing bid preference structure while avoiding additional administrative complexity associated with applying preferences separately to the solar and storage components.

g. Whether the EDCs should have discretion to adjust the targeted period for individual projects to align with specific system demands;

Yes. As discussed in response to part b. targeted periods for individual projects should be identified in project-specific agreements and be subject to revisions by the EDC. Eversource welcomes opportunity to collaborate with prospective program participants to develop policies and procedures that will enable the operation of individual projects to align with specific system demands while maintaining favorable project economics.

h. Relevant operational aspects and lessons learned from similar programs in other jurisdictions, such as Hawaii and Nevada; and

Hawaii and Nevada have both supported the deployment of competitively-priced paired solar and storage resources that contribute to electric resource requirements. This has been accomplished through renewable dispatchable generation ("RDG") agreements in Hawaii and solar plus storage power purchase agreements ("PPAs") in Nevada. The main feature of these approaches included in the MPF proposal is decoupled payments and/or criteria for solar photovoltaic ("PV") and BESS performance. Nevada Energy has executed numerous PPA's

through competitive solicitations which provide separately denominated payments for energy ($/MWh) and BESS output capacity ($/MW).[2] Hawaii Electric Company's RDG framework compensate projects which the distribution company retains operational control over, but compensation is conditioned on the separate availability of both the PV and BESS.[3] These commercial structures have been in place for many years in both states through repeated successful renewable energy solicitations.

Eversource expects that aligning the compensation structure to the specific attributes of solar and energy storage resources will provide a predictable revenue stream to support the financing and development of paired storage resources, while also encouraging resources to operate on a schedule that is likely to support the resource requirements of the electric power system. Inclusion of differentiated payments similar to Hawaii and Nevada is likely to support the successful integration of more energy storage resources within Connecticut successor programs.

i. ***Any additional considerations for the implementation of an MPF for successor programs in Connecticut.***

As noted in the Company's response to CAE-009, Eversource recommends that any storage capacity deployed under an MPF program should still be reflected in progress toward meeting Connecticut energy storage deployment goals, including the goal of reaching 580 MW of storage deployed in the state by 2031. Ignoring storage deployed through an MPF program would understate progress toward achieving Connecticut's clean energy goals and/or increase the costs of reaching those goals.

2. NRES Successor Program Netting Tariff

The Authority requests stakeholder comments on whether a non-residential Netting tariff

[2] Nevada Power Company and Sierra Pacific Power Company, 2026 Joint Triennial Integrated Resource Plan, Supply Plan, p. 55-141.
[3] *Quick Insights: Solar Plus Storage PPAs in Hawaii*, Electric Power Research Institute, February 2019.

should offer netting on an instantaneous basis with exports compensated at a rate less than the full kWh retail rate, and how an instantaneous Netting tariff with reduced export compensation can be implemented within a continued competitive solicitation process.

Eversource supports consideration of instantaneous netting with exported energy compensated at a value below the full retail kWh rate within non-residential netting tariffs. Eversource does not anticipate that implementing such a structure would require a fundamental change to the existing solicitation process, provided that the applicable compensation methodology is established through the successor tariff.

For projects selected through a non-competitive process, the tariff would establish the applicable compensation for exported energy based on the chosen methodology. This would provide applicants with a clear and predictable compensation structure without requiring them to determine the value of exported energy through a competitive bid.

For competitively selected projects, Eversource recommends continuing to use the $/MWh bid as the principal basis for evaluating proposals. The compensation applicable to instantaneous netting could then be established by a uniform methodology through the tariff rather than being determined on a project-by-project basis throughout the solicitation.

If the Authority elects to establish instantaneous netting at a value below the full retail rate, Eversource recommends that the value of exported energy be determined using a transparent and predefined methodology. The methodology could distinguish between the various components of the retail rate and the value each component provides to the electric system, rather than assuming that all retail rate components represent an equivalent value for exported generation.

The Authority could consider methodologies used in other jurisdictions as a starting point. For example, Massachusetts' SMART program uses a methodology for determining energy value of certain behind-the-meter generation that results in a weighted average value that reflects the full

retail rate as well as a reduced export compensation rate. A similar framework could be evaluated for Connecticut, with the specific components and weighting factors adjusted to reflect Connecticut's market structure and the Authority's determination of the appropriate value of exported energy.

Establishing the export compensation value through the tariff would provide developers with transparency regarding how the value of energy will be determined. Although the resulting compensation rate could vary as the underlying retail rate components change, the predefined methodology would allow developers to understand the basis for that compensation when evaluating the economics of a project.

Accordingly, Eversource believes instantaneous netting at a defined value below the full retail rate could be incorporated into the successor program without fundamentally altering the solicitation structure. The key consideration would be establishing a transparent methodology for determining the export compensation value and incorporating that methodology into the tariff.

3. Residential Incentive Adder Implementation

The Authority seeks further stakeholder comments on the benefits and drawbacks of Alternative incentive adder administration approaches, including whether any fixed per-kW incentive should be administered monthly or as a one-time upfront incentive.

Eversource confirmed in its response to CAE-006 that it would be feasible to administer fixed per-kW residential incentives within existing processes and systems. The Company expects that the current quarterly frequency of incentive payments of the RRES program will remain adequate for any successor program. The primary benefit for successor program participants will continue to be substantial reductions in monthly utility bills and additional incentive payments, if any, will likely remain comparatively small. Providing smaller payments at a higher frequency would increase program administrative requirements and costs without contributing to a significant

change in the experience of participating customers.

The Company also does not recommend up front incentives. Such a structure could result in other customers funding incentives for facilities that do not remain in-service for their full useful lives. Up-front incentives could also negatively impact the balance of costs among participants and non-participants by incurring the full incentive cost immediately instead of over the enrollment term of participating projects.

III. CONCLUSION

The Company appreciates this opportunity to provide these comments and responses to PURA's questions. The Company looks forward to further discussing these issues with PURA, docket Participants, and other stakeholders in Docket No. 26-06-04.

Respectfully submitted,

EVERSOURCE

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CERTIFICATION

I hereby certify that on October 2, 2026, the foregoing document was filed with the Public Utilities Regulatory Authority, and copies of the foregoing document were served upon each person designated on the Authority's official service list in this proceeding in accordance with R.C.S.A. § 16-1-15.

By: *Daniel T. Crisp*
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