STATE OF CONNECTICUT

PUBLIC UTILITIES REGULATORY AUTHORITY

DOCKET NO. 26-06-04

IMPLEMENTATION OF CLEAN ENERGY SUCCESSOR PROGRAMS

COMMENTS OF BASE POWER COMPANY

Base Power Company ("Base") respectfully submits these comments in response to the Authority's July 28, 2026 Notice of Request for Written Comments ("Notice") in the above-captioned docket, which asks stakeholders to address the implementation of successor programs to the Residential Renewable Energy Solutions ("RRES"), Non-Residential Renewable Energy Solutions ("NRES"), and Shared Clean Energy Facility ("SCEF") programs pursuant to Public Act No. 26-127, *An Act Concerning Renewable Power Generation* ("the Act").

I. INTRODUCTION AND STATEMENT OF INTEREST

Base designs, installs, owns, and operates battery storage systems at customers' homes. Base's batteries give members backup power during outages and, in normal operation, are dispatched as an aggregated, grid-balancing resource. Charging when system demand and wholesale costs are low and discharging to support the grid when demand is high. Base currently operates in Texas and plans to begin deploying in Connecticut in the fourth quarter of 2026.

Because Base's business is standalone residential battery storage rather than solar generation, our interest in most of the questions posed in the Notice is limited. We take no position on the time-differentiated compensation, metering, or incentive-adder questions in Sections 1 through 3 of the Notice, which are directed principally at solar developers and the RRES, NRES, and SCEF successor programs. We write instead under Section 4 of the Notice, "Additional Topics," to raise an issue concerning the annual program budget cap established by

Section 4(a) of the Act, specifically, the disparate treatment of standalone residential storage relative to residential solar-plus-storage.

II. STANDALONE RESIDENTIAL STORAGE SHOULD RECEIVE THE SAME BUDGET-CAP TREATMENT AS PAIRED SOLAR-PLUS-STORAGE

A. The Act's budget-cap exception is based on ratepayer benefit, not on resource type.

Section 4(a) of the Act sets a combined annual target for the RRES, NRES, and SCEF successor programs and the existing residential storage program at General Statutes § 16-243ee: 180 megawatts and an aggregated $85 million per year, with the budgetary target controlling if the two cannot be reconciled. That same subsection carves out one case from the cap: where a residential solar photovoltaic system paired with a co-located energy storage system is shown, through a ratepayer impact measurement ("RIM") test developed by the Authority, to benefit all ratepayers, that paired system "shall not be counted by the authority toward the megawatt procurement or budgetary targets" in subsection (a).

Standalone residential storage receives no equivalent treatment today, even though Section 4(a) also directs the Authority to pursue an affirmative goal of 580 megawatts of storage deployed in the state by December 31, 2031, a goal that depends substantially on standalone storage. Base raises this gap only to ask that standalone storage be measured by the same ratepayer-benefit yardstick the Act already applies to paired systems, not to suggest that paired solar-plus-storage should be treated any less favorably than it is today.

B. Standalone storage already has an established record of strong RIM performance that supports extending the same exception to it.

When the Authority created the Energy Storage Solutions Program ("ESS"), it made the RIM test the central ratepayer-protection metric for standalone battery storage, explaining that "a

RIM greater than one indicates 'ratepayers as a whole, including non-participant ratepayers, are not subject to a cost-shift, since the benefits outweigh the costs for ratepayers as a whole.'" The Authority directed the Connecticut Green Bank to design ESS incentives to deliver a RIM of at least 1.4 over the Program's first three-year cycle, and PURA restructured ESS's incentives again effective April 1, 2026 specifically to improve the Program's performance and cost-effectiveness for ratepayers. Docket No. 17-12-03RE03, Final Decision (July 28, 2021), pp. 33–35; Docket No. 25-08-05, Year Five Decision (Dec. 17, 2025).

The Authority's own modeling supports this. The Program Administrators have reported that the ESS Program's current RIM is 1.69. Docket No. 25-08-05, Annual Energy Storage Solutions Program Review Year 5, Decision (Dec. 17, 2025), pp. 30–31 (citing Motion No. 13, Nov. 3, 2025, p. 5). By comparison, in the legislative report proposing successor tariff designs for RRES, the Authority calculated that under the leading candidate design, reduced export compensation, without storage, the RIM is 1.27 for Eversource customers and 1.10 for United Illuminating customers. Docket No. 25-02-14, Renewable Energy Tariff Programs Successor Study, Legislative Report (Feb. 27, 2026), p. 43 (Table 12). When that same design is modeled with co-located storage added, the RIM falls to 0.97 for Eversource and 0.87 for United Illuminating, below the 1.0 threshold the Authority uses to signal a cost shift onto nonparticipating ratepayers. Id. On the numbers the Authority itself has already put on the record, then, standalone storage's RIM is not merely comparable to paired solar-plus-storage's; it is meaningfully stronger.

C. Extending the exception to standalone storage would also support the Act's own storage goal.

Section 4(a) sets a 580-megawatt storage deployment target that is not conditioned on solar pairing. Applying the same ratepayer-benefit exception to standalone storage would support that target directly and would ensure budget-cap treatment tracks demonstrated ratepayer benefit consistently, whatever form a given project takes.

D. Recommendation

Base recommends that the Authority apply the same RIM test it uses for paired solar-plus-storage to standalone residential storage systems participating in the program established at General Statutes § 16-243ee, and that standalone systems shown to benefit all ratepayers under that test likewise be excluded from the megawatt and budgetary targets in Section 4(a). This approach keeps the Authority's own ratepayer-benefit test, rather than technology type, as the basis for what counts against the cap, and treats both resources consistently under the same ratepayer-protection rationale.

III. CONCLUSION

Base appreciates the opportunity to comment and looks forward to participating further in this docket, including by providing supporting RIM analysis as the Authority develops the budget allocation methodology referenced above.

Respectfully submitted,

BASE POWER COMPANY

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August 26, 2026