November 10, 2026

Via Electronic Filing

Jeffrey R. Gaudiosi, Esq., Executive Secretary
Public Utilities Regulatory Authority
10 Franklin Square
New Britain, CT 06051

RE: Docket No. 26-08-05 – Annual Energy Storage Solutions Program Review – Year 6 – Written Exceptions

Dear Mr. Gaudiosi,

Tesla, Inc. respectfully submits these written exceptions for filing in Docket No. 26-08-05. Please contact me with any questions regarding this filing.

Respectfully,

/s/ Dominic Gatti
Dominic Gatti
Energy Policy Advisor
Tesla, Inc.
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STATE OF CONNECTICUT
PUBLIC UTILITIES REGULATORY AUTHORITY

ANNUAL ENERGY STORAGE SOLUTIONS PROGRAM REVIEW – YEAR 6	:	Docket No. 26-08-05
	:	November 10, 2026

TESLA, INC. WRITTEN EXCEPTIONS

Tesla, Inc. ("Tesla") respectfully submits these written exceptions to the Public Utilities Regulatory Authority's ("PURA" or "the Authority") October 29, 2026, Proposed Decision in the above-captioned docket. Tesla supports the Proposed Decision's pathway for commercial bidirectional electric vehicle ("EV") charging systems to participate in the Energy Storage Solutions ("ESS") Program to the extent that pathway furthers vehicle-to-grid ("V2G") participation more broadly. Tesla is nonetheless disappointed that residential V2G customers are left out of the 2027 program year, but looks forward to working with the Program Administrators ("PAs") to advance residential participation in 2028.

Tesla endorses the Vehicle-Grid Integration Council's ("VGIC") written exceptions. The exceptions below state Tesla's own requests on two points: amending Ordering Paragraph 23 so the August 1, 2027, filing is informed by industry expertise, and requiring 15-minute discharge and performance telemetry rather than 15-minute state-of-charge telemetry.

I. Amend Ordering Paragraph 23 so the August 1, 2027 filing is informed by industry

Ordering Paragraph 23 directs the PAs to submit, no later than August 1, 2027, a compliance filing containing a recommendation as to whether residential bidirectional EVs should be eligible, and to address items (a) through (g). The Proposed Decision says that, if the identified challenges are resolved and the record supports it, residential bidirectional EVs may be considered for the 2028 program year. However, Ordering Paragraph 23 does not require the PAs to work on those topics with industry before they file, or to show how industry's input was used. Without that exchange, industry has no dedicated forum to educate the PAs over the next year, and the August 1, 2027 filing will have to answer the Authority's operational questions on a scant record.

Tesla encourages the Authority to extend, in a limited fashion, the Bidirectional EV Working Group established in the Year 5 Decision to provide that forum. The Working Group met six times from March to June 2026 and already includes the PAs and relevant industry stakeholders. That expertise should be leveraged as the PAs prepare the August 2027 recommendations. Tesla respectfully requests that the Authority:

- Amend Ordering Paragraph 23 to include a new subsection, "**Defined Barriers,**" that directs:

"If the PAs do not recommend residential bidirectional EV participation, they shall provide a detailed explanation of any outstanding challenges for residential bidirectional EV participation and a catalogue of the concrete and currently insurmountable barriers preventing the inclusion of residential systems."

- Direct the PAs to hold at least four Bidirectional EV Working Group meetings and invite industry stakeholders, beginning no later than January 31, 2027, and concluding before August 1, 2027, with a defined meeting schedule and agenda tied to items in Ordering Paragraph 23.
- Direct the PAs to describe, in the August 1, 2027 compliance filing, the content industry raised and how the PAs responded, including any barrier the PAs contend remains.

The meetings should be aimed at building towards a PA recommendation that residential bidirectional EV charging systems be eligible in 2028. If the PAs do not make that recommendation, the Defined Barriers subsection should require them to explain why, in concrete terms set out above. Tesla hopes to work closely with the PAs and others to increase confidence in and understanding of V2G systems, and looks forward to residential V2G eligibility in 2028.

II. Require 15-minute discharge and performance telemetry, not 15-minute state-of-charge

Tesla does not object to a requirement that an enrolled bidirectional EV charging system provide discharge and performance information at 15-minute intervals - that information is what a performance payment is based on. However, the Proposed Decision further requires "stored kWh telemetry at 15-minute intervals," and forbids the PAs to waive that requirement, but in the next sentence, treats a failure to provide "discharge telemetry data" as a basis for recording performance as zero. Those two telemetry data streams are not the same.

Stored kWh is a state-of-charge measure whereas discharge and performance data show what the system actually delivered during an event. The Report suggests giving the PAs the ability to waive the stored-kWh interval because some EVs may be unable to provide that data consistently; that could be because the EV is not connected to the EVSE that transmits the information or does not measure state-of-charge in the same way stationary storage does. The Proposed Decision rejects the distinction between performance data and passive state of charge data and requires stored kWh on the same terms as performance data. A gap in state of charge should not be treated as a gap in discharge data, and it should not, by itself, zero the performance payment.

Tesla respectfully requests that the Authority revise the telemetry holding at Proposed Decision at 21, and the Program Manual revision required by that holding and by Order No. 19, to:

- Allow Program Administrators to waive the 15-minute stored-kWh (i.e., state-of-charge) telemetry requirement. PURA should still require 15-minute discharge and performance telemetry.

- Apply the zero-performance consequence only when required discharge or performance data are missing for the relevant period, and not when state-of-charge data is missing.
- Retain Program Administrator discretion to waive stored-kWh telemetry, as the Report recommended.

Tesla appreciates the Authority's work to bring bidirectional EV charging systems into the ESS Program, and the signal that residential participation remains a near-future opportunity. Tesla asks that the Final Decision make that path concrete and correct the telemetry language identified above.

Respectfully submitted,

/s/ Dominic Gatti
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CERTIFICATE OF SERVICE

I certify that a copy of this filing is being provided by electronic mail to all parties and participants of record according to the Authority's service list for this docket as of today, November 10, 2026.

/s/ Dominic Gatti
Dominic Gatti
Energy Policy Advisor
Tesla, Inc.