STATE OF CONNECTICUT

PUBLIC UTILITIES REGULATORY AUTHORITY

ANNUAL ENERGY STORAGE SOLUTIONS PROGRAM REVIEW – YEAR 6	**:**	**DOCKET NO. 26-08-05**
	:	
	:	**AUGUST 28, 2026**

WRITTEN COMMENTS OF THE CONNECTICUT LIGHT AND POWER COMPANY D/B/A EVERSOURCE ENERGY

I. INTRODUCTION

The Connecticut Light and Power Company d/b/a Eversource Energy (the "Company" or "Eversource") submits to the Public Utilities Regulatory Authority ("PURA" or the "Authority") the following comments in response to the August 12, 2026 Notice Of Request For Written Comments (the "Notice") on the Energy Storage Solutions Program (the "Program" or the "ESS Program") established by PURA in the July 28, 2021 Final Decision in Docket No. 17-12-03RE03, PURA Investigation into Distribution System Planning of the Electric Distribution Companies – Electric Storage. This is the second set of Written Comments submitted by the Company in this docket. The Company filed its first set of Written Comments in the captioned docket on July 9, 2026 ("Eversource's First Written Comments") in response to PURA's first Notice Of Request For Written Comments issued on June 16, 2026.

II. EVERSOURCE COMMENTS

The Company appreciates this opportunity to submit a second set of written comments to PURA and respectfully requests that PURA consider the Company's comments as it reviews Year 6 of the Program in this proceeding.

A. Eversource Written Comments on Topics Identified In the Notice

Eversource provides the following written comments on the two (2) topics identified by PURA in the Notice. The numbers below in this section correspond to the number of each topic as it appears in the Notice.

1. Recommended Programmatic Changes

The Connecticut Green Bank, Eversource, and The United Illuminating Company (collectively, the "Program Administrators" or the "PAs") proposed several modifications to the ESS Program Manual in Attachment 4 of the PAs' August 3, 2026 compliance with Order No. 3 of the Final Decision issued on December 17, 2025 in Docket No. 25-08-05.[1] Overall, these proposed changes are reasonable, administrative in nature, and aid in advancing the ESS Program's foundational objectives established in the July 28, 2021 Final Decision in Docket No. 17-12-03RE03.[2] Specifically, the recommendations support continued delivery of ratepayer benefits, facilitating the deployment of distributed storage resources, reducing barriers to participation, further improving program administration, and preserving market confidence.

a. Alignment with Objective 1: Positive Net Present Value for Ratepayers

Program Objective 1 directs that the Program must provide positive net present value to ratepayers. Several proposed modifications in the Program Manual would improve program efficiency and reduce administrative burden without proposing modified incentive levels or expanding ratepayer obligations. The removal of passive dispatch enrollment provisions, clarification of enrollment requirements, consolidation of legacy program information into

[1] Docket No. 26-08-05, Order No. 3 & 8 Compliance (filed Aug. 3, 2026), Attachment 4.

[2] Docket No. 17-12-03RE03, PURA Investigation into Distribution System Planning of the Electric Distribution Companies –Electric Storage, Final Decision (July 28, 2021) at 4-7.

supplemental materials, and streamlining of Program documentation would reduce administrative complexity and implementation costs. Likewise, the removal of annual performance incentive payments reflects practical limitations of Distributed Energy Resource Management System ("DERMS") administration and is expected to streamline customer program performance comprehension without materially affecting customer performance incentive disbursement. These proposed modifications would help ensure that the Program Administrators remain focused on delivering measurable grid and customer benefits while maintaining prudent use of ratepayer funds.

b. Alignment with Objective 2: Multiple Grid Benefits

The ESS Program was designed to provide multiple grid benefits, including peak reduction increased resilience, and support for distributed energy resources. The proposed operational revisions to allow for alternative communications protocols where OpenADR integration is not feasible would continue to encourage expanded participation by aggregators, operators, and original equipment manufacturers that may otherwise be unable to participate. Increasing the number and diversity of integrated storage assets would enhance the ability of the Program to deliver reliable grid services and maintain active participation during peak reduction events. Additionally, enhanced provisions allowing case-by-case add-on systems and reasonable change orders may facilitate incremental storage deployment that can increase available grid capacity over time.

c. Alignment with Objective 3: Sustained and Orderly Development of Connecticut's Storage Industry

Many of the proposed changes directly support Objective 3, including the proposed establishment of the broader "Eligible Provider" definition, clarification of participant roles, modernization of payment beneficiary provisions, transfer flexibility, improved enrollment

procedures, and accommodation of add-on systems reduce uncertainty for contractors, third-party owners, aggregators, lenders, and customers. These changes would increase the ease of customer participation and would increase forecasting outlooks, while also preserving program controls.

d. Alignment with Objective 4: Resilience for Priority Populations

While the proposed modifications are primarily administrative, they will support resilience objectives by reducing administrative hurdles that could otherwise delay project development. More efficient enrollment pathways, clearer eligibility timelines, accommodation of system expansions, and reasonable project change order provisions will allow for eligible customers to successfully complete projects and receive resilience benefits associated with storage ownership. Continued program accessibility remains important for underserved, low-income, and resilience-focused customer segments.

e. Alignment with Objective 5: Lowering Barriers to Storage Deployment

Objective 5 receives the largest impact overall from the PAs' proposed program modifications. The revisions will simplify enrollment requirements, clarify eligibility deadlines, modernize insurance requirements, provide flexibility for legacy customers seeking system expansions, allow reasonable project modifications, and reduce administrative ambiguity through the Program Manual.

The proposal to measure the six-month enrollment incentive eligibility period from approval-to-energize, regardless of provider approval status, establishes a straightforward and easily comprehended rule. Similarly, the proposed add-on battery provisions and reasonable change-order accommodation address practical issues encountered by customers and contractors after project approval. These reforms would reduce avoidable market friction while preserving program integrity.

f. Alignment with Objective 6: Environmental Benefits

Although the recommended changes do not directly modify dispatch requirements or incentive structures associated with emissions reductions, they would support continued deployment of battery storage systems that would further reduce reliance on fossil-fuel peaking resources and facilitate greater integration of renewable generation resources. By improving participation pathways and lowering administrative burdens, these changes could incrementally contribute to additional storage adoption and their associated environmental benefits.

g. Alignment with Objective 7: Maximizing Wholesale Capacity Market Benefits

The proposed modifications would preserve the Program's existing operational structure while allowing additional flexibility in communications and participant administration. By supporting participation from aggregators, operators, and third-party owners, the changes may improve the ability of enrolled resources to perform consistently and deliver capacity-related value. Improved market participation and operational reliability will ultimately support the Program's goal of maximizing benefits derived from storage participation while maintaining benefits for Connecticut ratepayers.

h. PURA Should Approve the PAs' Recommended ESS Programmatic Changes

The Program Administrators' recommended modifications are generally administrative refinements that reflect lessons learned during ESS Program implementation. Collectively, the proposed changes would advance multiple ESS Program Objectives, particularly Objectives 1, 3, and 5, by improving administrative efficiency, reducing barriers to participation, enhancing market certainty, and supporting continued deployment of distributed energy resources. The proposed revisions will maintain the core structure and policy established by PURA in the ESS Program

while also providing the flexibility needed to support continued program growth and effective administration. Eversource recommends PURA approve the Program Administrators' recommendations as proposed.

2. Bidirectional Electric Vehicle ("EV") Participation

Eversource believes that battery energy storage systems ("BESS") participating in the ESS program and EVs participating in the managed charging program ("Managed Charging") both provide benefits to ratepayers but the Company is unable offer an opinion on which option -- Bidirectional EVs participating in the ESS program or Bidirectional EVs participating in Managed Charging -- would provide greater overall benefits to ratepayers, considering the nascent state of this technology. While some research has shown that Bidirectional charging could offer substantially more benefit,[3] the technology and supporting standards are still evolving, and real-world residential V2G participation is still very limited. The Company has yet to receive performance data from either bidirectional EV pilot it is assisting with in Massachusetts and Connecticut,[4] and the pilots are ongoing. Without real-world performance data from Bidirectional EVs, the Company cannot assess how these assets will perform in an Active Dispatch event and therefore is unable to provide responsive information. The Company would appreciate more time to allow the pilots conclude and issue final reports to allow the Company, PURA, and other stakeholders to reasonably assess the load management value of customer bidirectional EVs.

3For example, see Vehicle-Grid Integration Valuation Studies (2026), Energy+Environmental Economics, Funded by GM E3-GM-Energy-Value-of-VGI-Study.pdf

[4] In Connecticut, Eversource is assisting with the Bidirectional Energy pilot project in Docket No. 23-08-07, Innovative Energy Solutions Program Cycle 02.

For the reasons discussed above, the ESS Program Administrators recommended that only Commercial Bidirectional EVs be permitted to participate in the ESS Program at this time. As stated in the Bidirectional EV Report:[5]

> Commercial bidirectional EVs — and electric school buses in particular — are the most mature use case for V2G in Connecticut today. DC-coupled architecture is well-established, the GridEdge IES pilot has demonstrated deployment in Connecticut, and the Beverly, Massachusetts Connected Solutions pilot has demonstrated multi-year V2G revenue generation at scale. Fleet operators are sophisticated program counterparties capable of managing enrollment, dispatch availability, and aggregation. Commercial customers are also more likely to deploy multiple ports per site, improving customer economics and helping to manage administrative burden, both on the participant and the Program Administrators. Deploying at currently approved Small/Medium C&I rates provides a more compelling financial incentive for early movers while providing assurance to PURA and ratepayer advocates that the program expansion is likely to deliver ratepayer benefits.

Eversource offers a detailed discussion of the milestones that must be met before the inclusion of Residential Bidirectional EVs in the ESS Program in its response to PURA interrogatory CAE-20, filed on August 28, 2026. In summary these include:

- Customers are willing to enroll in V2G programs;
- Participating customers are home and their vehicles are plugged in during events;
- Customer vehicles deliver a meaningful number of kilowatts in events;
- EV supply equipment ("EVSE") can integrate with a DERMS;
- DERMS platforms can send EVSE dispatch signals; and
- DERMS platforms can receive EVSE dispatch performance.

Eversource is also interested in studying the charging behavior of Bidirectional EVs participating in the Connecticut and Massachusetts pilots referenced above to review when participating Bidirectional EVs vehicles are charging and whether charging is activating

[5] Docket No. 26-08-05, Order No. 20 Compliance (filed July 29, 2026), Attachment 1 "Bidirectional EV Working Group Report" at 62.

immediately before dispatch events (pre-positioning) or immediately after events conclude, which may create new peaks or "snapback" effects that could impact the local distribution system.

Eversource is supportive of the Bidirectional EV Report's recommended technical requirements, including DERMS integration, telemetry requirements, UL certification requirements and ISO 15118-20 communication standards.

Finally, Eversource believes that no modifications are needed to the ESS Program or the bidirectional EV interconnection process to facilitate cost-effective participation while maintaining Program integrity and protecting ratepayers.

Eversource notes that the Bidirectional EV Working Group's discussions repeatedly demonstrated that V2G implementation extends far beyond the scope of any single PURA proceeding. As documented throughout the Bidirectional EV Report, V2G intersects with ESS Program design, the EV Charging Program (both managed charging and make-ready rebates), EV charging tariffs, the Medium and Heavy-Duty EV Program, interconnection requirements, distributed generation policies, telemetry standards, DERMS integrations, and future renewable compensation frameworks. The breadth of these interactions makes it incredibly difficult to comprehensively address V2G issues within existing dockets.

Accordingly, Eversource strongly supports the recommendation made in the Bidirectional EV Working Group report[6] that PURA establish a separate, dedicated V2G docket beginning in 2027. Eversource believes that the substantial amount of cross-docket discussion and policy coordination now required for V2G warrants a standalone proceeding where stakeholders can holistically evaluate the previously mentioned challenges in an all-encompassing proceeding. A

[6] Docket No. 26-08-05, Compliance with Order No. 20 (filed July 29, 2026), Attachment 1 "Bidirectional EV Working Group Report" at 64.

dedicated V2G docket would provide a centralized forum to review V2G pilot findings and resolve these issues in a coordinated manner rather than addressing them through multiple proceedings.

III. CONCLUSION

The Company respectfully requests that PURA consider its second set of written comments as it conducts its review of the ESS Program in this docket.

Respectfully submitted,

THE CONNECTICUT LIGHT AND POWER COMPANY DBA EVERSOURCE ENERGY

By: *Jennifer E. Galiette*
Jennifer E. Galiette, Esq.
Senior Counsel
Eversource Energy
P.O. Box 270
Hartford, CT 06141-0270
T: (860) 665-2598
E: Jennifer.galiette@eversource.com

CERTIFICATE OF SERVICE

I hereby certify that I have this day served the foregoing document upon each person designated on the official service list in this proceeding.

Dated at Berlin, Connecticut this 28th day of August 2026.

Jennifer E. Galiette
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