STATE OF CONNECTICUT
PUBLIC UTILITIES REGULATORY AUTHORITY

August 12, 2026
In reply, please refer to:
Docket No. 26-08-05

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

Enclosed are interrogatories numbered **CAE-9 through CAE-46.**

Interrogatories numbered CAE-9 through CAE-17 are directed jointly to The Connecticut Light and Power Company d/b/a Eversource Energy (Eversource), The United Illuminating Company (UI; collectively, the EDCs), and The Connecticut Green Bank (CGB; collectively with the EDCs, the Program Administrators). Interrogatories numbered CAE-18 through CAE-22 are directed individually to Eversource, UI, and CGB. Interrogatories numbered CAE-23 through CAE-25 are directed to CGB. Interrogatories numbered CAE-26 through CAE-39 are directed individually to Eversource and UI. Interrogatories numbered CAE-40 through CAE-46 are directed jointly to the Energy Storage Industry Commenters.

The responses to these questions have been deemed necessary by the Public Utilities Regulatory Authority (Authority) in connection with the above-referenced docket and will become a part of the record in this proceeding. Please note that persons responsible for responses must be available for cross-examination during a hearing, if held, and must attest to the truth and accuracy of their responses.

Please submit the responses to the Authority's Executive Secretary no later than **August 28, 2026, at 4:00 p.m.** The Authority encourages the submission of responses as soon as they are available rather than delaying until all answers are completed. **Please list each question and answer on the same sheet of paper using a separate sheet for each interrogatory number, and sequentially number the pages of each response (e.g., p. 1 of 5, etc.). At the top of each page, clearly identify the Docket Number, the interrogatory number (including the prefix), the name of the company and the person responsible for the response, and the date of submission.**

Similarly, each Late Filed Exhibit that may be submitted after hearing in this docket shall be sequentially numbered and identified with the Docket Number, Late Filed Exhibit Number, page number, the name of the company and the person responsible for the exhibit, and the date of submission.

If a response to any of the requested information has already been filed in response to another Parties' interrogatory(ies) in this proceeding, please reference the interrogatory which provides the information. It is the respondent's responsibility to ensure that any such information is on file with the Executive Secretary of the Authority.

ELECTRONIC SUBMISSION OF FILINGS

IMPORTANT NOTE: The Authority has indefinitely suspended the paper copy filing requirement. Anyone filing material with the Authority should file only an electronic copy through the PURA Web Filing System. Please refer to the Electronic Filing webpage for more information, including on confidential materials: Make An Electronic Filing

CONFIDENTIAL DOCUMENTS

No confidential material may be filed publicly through the web filing system. Confidential material can be filed electronically by emailing the material to Jeff.Gaudiosi@ct.gov with a subject line labeled in all capital letters "CONFIDENTIAL MATERIAL - NOT FOR PUBLIC DISCLOSURE." Each page of any electronic confidential information shall also contain a header "CONFIDENTIAL – NOT FOR PUBLIC DISCLOSURE." The motion for a protective order shall be filed electronically.

The Authority operates with the strong presumption that all documents filed with it are public records subject to the right of public inspection and copying in accordance with the Connecticut Freedom of Information Act, Conn. Gen. Stat. §1-200 et. seq. In those exceptional circumstances where a participant believes that information it intends to file is confidential under law, it may file a Motion for a Protective Order requesting an exemption from public disclosure. The Motion must provide specific legal arguments with reference to state or federal law describing with supporting facts why the information should be kept confidential. A certified affidavit supplied by a competent witness in support of the Motion must be appended to the Motion. The Authority will rule on the Motion forthwith, and it will give further direction as necessary.

The current service list for this docket is available on the Authority's website located at http://www.dpuc.state.ct.us/DPUCPublicList.NSF.

By the Direction of the Authority,

PUBLIC UTILITIES REGULATORY AUTHORITY



Jeffrey R. Gaudiosi, Esq.
Executive Secretary

Enclosure
cc: Service List

Interrogatories CAE-9 through CAE-17 are directed jointly to The Connecticut Light and Power Company d/b/a Eversource Energy (Eversource), The United Illuminating Company (UI; collectively, the EDCs), and The Connecticut Green Bank (CGB; collectively with the EDCs, the Program Administrators).

CAE-9 Estimate the administrative costs associated with implementing an enrollment incentive clawback provision under which a project that disenrolls before the end of its 10-year enrollment term must repay a prorated portion of its enrollment incentive. For example, a project that disenrolls after one year could be required to repay 90% of the enrollment incentive. Justify all cost estimates provided and break them down to the greatest level of detail practicable, including individual itemized cost components.

CAE-10 Report the average and median enrollment incentives received or reserved by each customer class (residential and commercial) since the implementation of Construct 5.

CAE-11 Earthlight Comments, July 9, 2026, pp. 3–4. Respond to Earthlight's concern regarding the active dispatch ranges identified in the ESS Program Manual (30–60 events per summer and 1–10 events per winter). Specifically, clarify whether the lower end of each range represents a minimum number of active dispatch events that must occur under the ESS Program or whether the ranges instead represent expected or maximum levels of active dispatch activity.

CAE-12 Program Administrator Order No. 20 Compliance, July 29, 2026, Att. 1, p. 66. Estimate the number and percentage of electric vehicle supply equipment (EVSE) or electric vehicle (EV) models that currently satisfy the technical requirements recommended in the Bidirectional EV Report, separately identifying commercial and residential devices. Include all assumptions used to develop the estimates.

CAE-13 Program Administrator Order No. 20 Compliance, July 29, 2026, Att. 1, p. 61. Explain the basis for recommending a minimum discharge capacity of 20 kW per charging port. Include any analysis performed evaluating alternative minimum discharge capacities and their expected impacts on ratepayer benefits and market participation.

CAE-14 Program Administrator Order No. 3 Compliance, August 3, 2026, Att. 2, p. 7. Explain why the total residential capacity is reported as 21.82 MW, while the Program's data dashboard[1] reports 14.7 MW of residential capacity (as of August 4, 2026, on Tab 4).

CAE-15 Program Administrator Order No. 3 Compliance, August 3, 2026, Att. 2, p. 54. Explain why the average power (kW) discharged during the 2025 ISO-NE peak hour exceeded the average power discharged across all active and passive dispatch events.

[1] Available at: https://energystoragect.com/ess-performance-report/.

CAE-16 Program Administrator Order No. 3 Compliance, August 3, 2026, Att. 2, p. 75. Explain why the Ratepayer Impact Measure (RIM) score is substantially higher under Avoided Energy Supply Costs (AESC) Counterfactual 6 than under AESC Counterfactual 1. In the response, identify the assumptions and modeling differences that account for the increase in the RIM score under Counterfactual 6.

CAE-17 Decision, Dec. 17, 2025, Annual Energy Storage Solutions Program Review – Year 5, p. 31. Explain whether legacy upfront incentive clawback amounts may continue to be recovered primarily through offsets against outstanding performance incentive payments. If so, estimate the percentage of legacy upfront incentive clawback amounts that can be recovered through such offsets.

Interrogatories CAE-18 through CAE-22 are directed individually to Eversource, UI, and CGB.

CAE-18 CGB Comments, July 9, 2026, p, 1. If recommending that change orders be permitted to allow projects to increase in size after project approval but before incentive payment when the increase results from circumstances outside the control of the customer or developer, propose an appropriate percentage threshold by which a project's size may increase after project approval but before incentive payment, identify the limited circumstances under which such changes should be allowed, and justify all recommendations provided.

CAE-19 Program Administrator Order No. 20 Compliance Filing, July 29, 2026, Att. 2, p. 38. If dual enrollment in the ESS Program and managed charging program is not permitted for EVs, should the make-ready program's 24-month managed charging enrollment requirement be waived for customers who exit the managed charging program solely to enroll in the ESS Program? If not, explain why.

CAE-20 Program Administrator Order No. 20 Compliance, Att. 1, pp. 63–64. For each milestone identified in the Bidirectional EV Report as a prerequisite for residential participation, identify the specific measurable criteria that the Program Administrators believe should be satisfied before recommending residential bidirectional EV eligibility.

CAE-21 Program Administrator Order No. 3 Compliance, Aug. 3, 2026, Att. 2, p. 18. Explain whether the identification of unresolved data quality issues affecting 4% of telemetry data impacted the accuracy of performance incentive payments or the applicability of upfront incentive clawbacks.

CAE-22 Program Administrator Order No. 3 Compliance, Aug. 3, 2026, Att. 2, p. 18. Comment on the findings and recommendations related to data quality presented in Table 2-1. Explain whether the recommendations have been implemented, are being pursued, or should be pursued. If any recommendations have not been or will not be pursued, explain the basis for that decision.

Interrogatories CAE-23 through CAE-25 are directed individually to CGB.

CAE-23 CGB Interrog. Resp. CAE-6. Comment on when testing of the Codibly solution is expected to be complete and when CGB expects to make a recommendation to the Authority regarding whether the solution should be adopted. Further, estimate the costs incurred to date for development and testing of the solution, both in the aggregate and on a per-project basis.

CAE-24 UI Interrog. Resp. CAE-1, pp. 1–2; Eversource Interrog. Resp. CAE-1, pp. 1–2. Provide a recommendation as to whether the annual performance incentive payment option should continue to be offered under the ESS Program. In responding, specifically address the concerns raised by the EDCs regarding continuation of the annual payment option.

CAE-25 Program Administrator Order No. 3 Compliance, August 3, 2026, Att. 2, p. 43. Describe any recent efforts undertaken by CGB to increase participation by multifamily affordable housing customers in the ESS Program. Describe the specific initiatives and any available information regarding their effectiveness or outcomes.

Interrogatories CAE-26 through CAE-39 are directed individually to Eversource and UI.

CAE-26 CGB Interrog. Resp. CAE-7. Comment on the data quality errors identified by CGB during its review of distributed energy resource management system (DERMS) data submissions. Identify the actions the EDCs are taking to reduce these data quality errors. Also comment on whether the data quality issues identified by CGB affect the accuracy of the EDCs' performance incentive payment calculations.

CAE-27 UI Interrog. Resp. CAE-1, pp. 1–2; Eversource Interrog. Resp. CAE-1, pp. 1–2. Explain why continuing to offer an annual performance incentive payment option may require significant system modifications and associated costs. If possible, quantify those costs and explain how the cost estimate was developed, including the assumptions and methodology used.

CAE-28 Decision, Dec. 17, 2025, Annual Energy Storage Solutions Program Review – Year 5, p. 10. Explain why the EDCs did not raise technical concerns regarding the annual payment option during the previous annual review cycle, particularly given that the EDCs supported levelized performance payments at that time.

CAE-29 Explain whether a standalone front-of-the-meter (FTM) energy storage resource that is precluded from participating in wholesale markets could take retail service under any existing time-of-use (TOU) tariff as a new customer and subsequently export energy for compensation to the EDC. If so, identify the applicable tariff(s), explain how such exports would be treated under the tariff, and describe any tariff limitations. If not, explain why not.

CAE-30 Explain whether the response to CAE-30 would differ if the FTM storage resource were co-located with on-site generation, including but not limited to solar photovoltaic (PV) generation. If so, identify the applicable legal, regulatory, or tariff provisions that distinguish between standalone and co-located resources.

CAE-31 Eversource Comments, July 9, 2026, p. 6, fn. 10. Explain whether retail transactions involving standalone FTM storage resources would have any implications under the Public Utility Holding Company Act of 2005. If so, identify the specific provisions implicated and explain the practical implications for the EDCs and the Authority.

CAE-32 Explain whether any changes to ISO New England market rules or FERC regulations would be necessary before a standalone FTM storage resource could participate under a revenue-neutral retail bidirectional TOU tariff. If so, identify each required change and explain why it is necessary.

CAE-33 OCC Comments, July 6, 2026, p. 6. Explain whether a standalone FTM storage resource operating solely under a revenue neutral bidirectional retail TOU tariff could create cost shifts between customer classes. If yes, describe the potential cost shifts, explain how they would occur, and describe how they could be mitigated.

CAE-34 The Alliance for Climate Transition (ACT), the Solar Energy Industries Association (SEIA), and the Coalition for Community Solar Access (CCSA; collectively, the Energy Storage Industry Commenters) Comments, July 9, 2026, pp. 5–8. Respond to the comments and proposals advanced by the Energy Storage Industry Commenters regarding the development of a bidirectional retail TOU tariff for standalone FTM storage resources. For each proposal with which the EDC disagrees, explain the basis for its disagreement.

CAE-35 Program Administrator Order No. 20 Compliance, Att. 1, p. 66. Explain whether the EDCs' current DERMS platforms are capable of dispatching, monitoring, and verifying bidirectional EVs using the technical requirements recommended in the Bidirectional EV Report. If not, identify each capability that remains to be implemented, along with the estimated implementation timeline and estimated implementation cost for each.

CAE-36 Explain whether the EDCs' current DERMS providers are capable of supporting both EV charging and discharging control signals. If not, explain why.

CAE-37 Estimate the number of EVs that have been approved by the EDCs for export to date, broken out by residential and commercial customer classes.

CAE-38 Program Administrator Order No. 3 Compliance, August 3, 2026, Att. 2, pp. 54, 59. Explain why neither EDC called an active dispatch event during the Winter 2025/2026 peak hour. Further, explain the measures the EDCs will implement to ensure that active dispatch events are called, where appropriate, during future winter and summer daily and seasonal peak hours.

CAE-39 Program Administrator Order No. 3 Compliance, August 3, 2026, Att. 2, p. 59. Explain why the EDCs consistently call substantially fewer active dispatch events than the maximum number permitted under the Program. In the response, address why this practice is appropriate given the Program's reduced ability to rely on the "insurance policy" provided by passive dispatch.

Interrogatories CAE-40 through CAE-46 are directed jointly to the Energy Storage Industry Commenters.

CAE-40 Eversource Comments, July 9, 2026, pp. 5-8. Respond to Eversource's legal and economic arguments opposing development of a retail TOU tariff for standalone FTM storage. Specifically: (a) explain the legal basis supporting the Authority's jurisdiction to establish such a tariff; and (b) explain why such a tariff would remain economically attractive if it were revenue neutral and included all applicable retail rate components, including non-bypassable charges.

CAE-41 Explain why the existing wholesale distribution access tariff (WDAT) is insufficient to support economically viable deployment of standalone FTM storage resources. Further, explain how a bidirectional retail TOU tariff would address those limitations.

CAE-42 Identify each benefit that standalone FTM storage provides to Connecticut electric ratepayers that is not fully reflected in existing wholesale market participation under the WDAT. For each benefit: (a) explain why it is not currently compensated; (b) identify who receives the benefit; and (c) explain how a bidirectional retail TOU tariff could compensate or reflect that benefit.

CAE-43 To the extent practicable, quantify each benefit identified in CAE-43. For each quantified benefit, provide: (a) the estimated dollar value; (b) the methodology used; (c) all assumptions; and (d) any supporting studies or analyses.

CAE-44 OCC Comments, July 6, 2026, p. 6. Describe how a bidirectional retail TOU tariff for standalone FTM storage would maintain revenue neutrality. Identify all customer classes that could be affected and explain how costs and revenues would be allocated among those classes.

CAE-45 Identify each state or electric utility that currently offers a bidirectional retail tariff substantially similar to the bidirectional retail TOU tariff proposed. For each example, identify: (a) the utility; (b) the jurisdiction; (c) the tariff name; (d) the year implemented; and (e) any publicly available evaluation of its performance.

CAE-46 Describe how a retail TOU tariff should prevent duplicative compensation for the same grid service if a standalone FTM storage resource is eligible to receive compensation from multiple markets.