STATE OF CONNECTICUT
PUBLIC UTILITIES REGULATORY AUTHORITY

DOCKET NO. 26-08-05
ANNUAL ENERGY STORAGE SOLUTIONS
PROGRAM REVIEW – YEAR 6

NOTICE OF REQUEST FOR WRITTEN COMMENTS
(August 28, 2026)

In 2021, the Public Utilities Regulatory Authority (Authority) established a statewide electric storage program, later re-named the Energy Storage Solutions Program (ESS Program or Program). Decision, July 28, 2021, Docket No. 17-12-03RE03, PURA Investigation into Distribution System Planning of the Electric Distribution Companies – Electric Storage (Storage Decision). Pursuant to Section IV.E. of the Storage Decision, the Authority conducts an annual proceeding to review key Program metrics and to make strategic adjustments to ensure: (1) continued alignment with the program objectives established in the Storage Decision; and (2) that the Program is on track to meet its deployment targets. This proceeding serves as the administrative record for the Authority's Year 6 Program review. The Authority may include additional relevant topics regarding Program implementation at its discretion.

NOTICE OF REQUEST FOR WRITTEN COMMENTS

To facilitate the Authority's evaluation of the Program, the Authority requests that docket participants and interested stakeholders file written comments on or before **4:00 p.m. on Friday, August 28, 2026,** addressing the following:

1. **Recommended Programmatic Changes**

The Authority directed The Connecticut Light and Power Company d/b/a Eversource Energy (Eversource), The United Illuminating Company (UI; together, with Eversource, the electric distribution companies or EDCs) and the Connecticut Green Bank (CGB; collectively, with the EDCs, the Program Administrators) to file by August 1 "an annual report summarizing the Program results to date, including an updated [benefit-cost analysis (BCA)] … and recommendations for any Program modifications to the ESS Program documents." Decision, Dec. 17, 2025, Docket No. 25-08-05, Annual Energy Storage Solutions Program Review – Year 5 (Year 5 Decision), p. 56.

On August 3, 2026, the Program Administrators submitted the required annual report, which included proposed revisions to the ESS Program Manual and related documents. The proposed changes include:

- Removing or relocating passive dispatch provisions from the Program Manual, as passive dispatch is no longer available to new customers;
- Removing the annual payment option for performance incentives and transitioning to biannual payments due to technical limitations associated with the EDCs' Distributed Energy Resource Management System (DERMS) providers;
- Revising the Direct Payment Beneficiary Form to recognize eligible institutional payment beneficiaries, including financial institutions, as recipients of performance incentives;
- Clarifying that the six-month deadline for obtaining an enrollment incentive begins upon approval to energize, regardless of when the contractor or equipment was approved for Program participation;
- Allowing add-on battery systems for legacy passive dispatch customers on a case-by-case basis, provided that the customer repays the applicable prorated upfront incentive amount to CGB;
- Allowing reasonable change orders for projects approved through legacy program tranches; and
- Allowing the Program Administrators, at their discretion, to propose alternative communication protocols where OpenADR integration is not technically feasible for an entity connecting with the Program's DERMS provider.

See Program Administrator Order No. 3 Compliance, Aug. 3, 2026, Att. 4.

The Authority requests written comments on the Program Administrators' annual report and proposed modifications. Specifically, commenters should address:

a. Whether the Program Administrators' recommended changes would advance the objectives of the ESS Program and, if so, how; and
b. If any proposed changes do not advance the Program's objectives, identify the specific concerns and recommend alternative approaches.

Stakeholders are encouraged to submit specific feedback and recommendations, with consideration for ratepayer impacts and, where possible, support from quantitative data.

2. Bidirectional Electric Vehicle (EV) Participation

During last year's annual ESS Program review, the Authority directed the ESS Program Administrators to establish and jointly lead a Bidirectional EV Working Group. See Decision, Dec. 17, 2025, Docket No. 25-08-05, Annual Energy Storage Solutions Program Review – Year 5 (Year 5 Decision), p. 60. On behalf of the Working Group, the Program Administrators were required to submit a Bidirectional EV Report presenting the group's findings and recommendations regarding the integration of bidirectional EVs into the ESS Program. Id.

The Program Administrators filed the Bidirectional EV Report (Report) on July 29, 2026. See Program Administrator Order No. 20 Compliance, July 29, 2026. The Report

recommends allowing commercial bidirectional EVs with a minimum discharge capacity of 20 kW per charging port to participate in the ESS Program, provided they are not simultaneously enrolled in the state's light-duty (LD) managed charging program. Id., Att. 1, p. 61. Under this recommendation, eligible commercial bidirectional EVs would receive the existing small/medium commercial ESS performance incentive for a 10-year enrollment period but would not be eligible for an enrollment incentive, as the Report concludes that this structure maintains a positive Ratepayer Impact Measure (RIM) score. Id., pp. 58, 61–62. The Report further concludes that the commercial bidirectional EV market represents the most mature near-term opportunity for ESS participation in Connecticut. Id., p. 62.

For residential bidirectional EVs, the Report does not recommend immediate inclusion in the ESS Program. Program Administrator Order No. 20 Compliance, July 29, 2026, p. 62. Instead, it recommends establishing a pathway with defined milestones that should be achieved before residential participation is considered. Id. These milestones include, among other things, completion of the Bidirectional Energy Innovative Energy Solutions (IES) pilot, incorporation of lessons learned from ongoing Massachusetts demonstrations, resolution of issues related to dual participation in the managed charging and ESS Programs, successful implementation of updated interconnection requirements, and clarification of metering and distributed generation policy considerations. Id., pp. 62-63. The Report recommends revisiting residential bidirectional EV participation during next year's ESS Program review if the Authority determines that doing so remains a priority. Id., p. 63.

The Report also recommends several technical and programmatic modifications to facilitate bidirectional EV participation. These recommendations include:

- requiring bidirectional EV systems to be capable of exporting energy to the grid;
- removing the existing islanding and backup power requirement for commercial bidirectional EV installations;
- treating bidirectional EVs as behind-the-meter (BTM) resources, even where the only on-site load is EV charging;
- using the maximum charging capacity of the bidirectional electric vehicle supply equipment (EVSE), rather than historical site demand, when applying the ESS Program sizing limitation, while relying on the interconnection process to address distribution system impacts;
- requiring applicable UL 1741 certifications for interconnection and Program eligibility;
- requiring ISO 15118-20 (or a later version), subject to Program Administrator discretion to grant case-by-case exemptions;
- requiring applicable UL 9741, UL 2202, and UL 2594 safety certifications;
- requiring completed DERMS integration; and
- requiring the same static and interval telemetry fields currently required under the ESS Program, reported at the charging-port level, while allowing discretion to waive the 15-minute reporting interval for state-of-charge data.

Program Administrator Order No. 20 Compliance, July 29, 2026, pp. 65–66. Separately, in the Year 5 Decision, the Authority directed the EDCs, on behalf of the Interconnection Working Group, to file recommended revisions to the interconnection process for bidirectional EVs, including proposed revisions to the Interconnection Guidelines and any necessary modifications to the PowerClerk system. Year 5 Decision, p. 61. The EDCs submitted these compliance filings on July 1, 2026. See EDC Order No. 25 Compliance, July 1, 2026.

The Authority requests written comments on both the Bidirectional EV Report and the EDCs' recommended interconnection changes for bidirectional EVs. Stakeholders that disagree with any recommendation should clearly identify the specific recommendation at issue, propose an alternative approach, and, to the extent practicable, support their position with quantitative analysis, operational experience, or other evidence.

In particular, the Authority seeks comments on the following issues:

a. Whether participation in the ESS Program provides greater overall benefits to ratepayers than participation in Connecticut's managed charging program for bidirectional EVs, assuming participation would be limited to a single program.
b. Whether eligibility should initially be limited to commercial bidirectional EVs or whether residential bidirectional EVs should also be eligible beginning in Program Year 6.
c. Whether residential bidirectional EVs should be eligible at this time, and, if not, suggest what milestones or conditions should be satisfied before they are incorporated into the ESS Program.
d. Whether the Report's recommended technical requirements, including DERMS integration, telemetry requirements, UL certification requirements, and ISO 15118-20 communications standards, are appropriate given current market readiness, interoperability, implementation costs, and expected ratepayer benefits.
e. Whether any additional modifications to the ESS Program or the proposed bidirectional EV interconnection process are necessary to facilitate cost-effective participation while maintaining Program integrity and protecting ratepayers.

Dated at New Britain, Connecticut this 12th day of August, 2026.

By direction of the Presiding Officer,



Jeffrey R. Gaudiosi, Esq.
Executive Secretary