STATE OF CONNECTICUT
PUBLIC UTILITIES REGULATORY AUTHORITY

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

COMMENTS OF BASE POWER COMPANY

August 28, 2026

Base Power Company ("Base") respectfully submits these comments in response to the Public Utilities Regulatory Authority's ("Authority" or "PURA") August 12, 2026 Notice of Request for Written Comments in the above-captioned Year 6 review of the Energy Storage Solutions Program ("ESS Program" or "Program"). These comments address Item 1 of the Notice, Recommended Programmatic Changes. Base takes no position in these comments on Item 2, Bidirectional Electric Vehicle Participation.

I. Interest of Base Power Company

Base is preparing to enter Connecticut's energy storage market as an Eligible Third-Party Owner ("TPO") under the ESS Program. Base has not yet commenced operations in Connecticut but expects to do so imminently. Once active in the state, Base will own and operate behind-the-meter battery energy storage systems ("BESS") for residential customers.

Base is entering the Connecticut market because the ESS Program offers a clear, well-designed incentive structure and a predictable, multi-year framework for Program administration. That predictability, in both the Program's rules and its incentive levels, is what gives TPOs the confidence to invest in deploying storage in the state. Base commends the

Authority and the Program Administrators for that work, and offers the comments below on the two aspects of the Program Administrators' recommended changes most directly relevant to Base's planned participation as a TPO.

II. Recommended Programmatic Changes

Base supports the Program Administrators' recommended changes addressed in Parts A and B below and recommends the Authority approve them. Base raises a concern regarding a separate proposed change, addressed in Part C, and requests that the Authority direct the Program Administrators to clarify that provision before it is adopted. Base also offers two additional recommendations, addressed in Parts D and E below: a fleet-level dispatch integration pathway for BESS Operators that maintain their own dispatch platforms, and consistent treatment of standalone residential storage under the budget framework of Section 4(a) of Public Act No. 26-127. Base takes no position on the remaining recommended changes described in the Notice.

A. The clarified default Performance Incentive payee for TPO-owned systems advances the Program's objectives.

The redlined Program Manual clarifies, in Section 6.6.3, that "[b]y default, Performance Incentives are paid to the owner of the BESS, either the host customer or an Eligible Third-Party System Owner (TPO)," and that "[e]ligible TPOs do not need to submit a Direct Payment Beneficiary Form in order to receive Performance Incentives earned by their customers' BESS, as long as the Customer Agreement establishes that Performance Incentives are retained by the TPO." Program Manual Sec. 6.6.3. Base supports this change. Under the prior Manual language, a TPO's right to receive Performance Incentives on a customer's BESS depended on a separately submitted Direct Payment Beneficiary Form, an added filing step for every enrolled system, and

a point of failure if a form was delayed, lost, or completed incorrectly. Because a TPO's entitlement to Performance Incentives is already documented in the Customer Agreement, the clarification removes a redundant filing requirement without reducing oversight.

B. The Authority should confirm that current Performance Incentive rate levels are not being reduced.

Base's review of the redlined Program Manual indicates that the recommended changes do not reduce the underlying $/kW Performance Incentive rates in Section 6.6.2 for existing customer categories. Base supports preserving the current incentive levels for existing rate tiers. Predictable incentive levels are central to Base's decision to enter the Connecticut market, and remain central to the investment decisions TPOs and their capital providers make when underwriting new projects. Base urges the Authority to confirm in its Year 6 decision that no reduction to current Performance Incentive rate levels is being adopted in this proceeding, so that TPOs and other Program participants can continue to rely on the Program's existing incentive structure.

Base takes no position in these comments on the Program Administrators' related recommendation to transition new enrollees from an annual/biannual payment election to mandatory biannual (seasonal) payments, as that change concerns the timing of Performance Incentive disbursements rather than the underlying incentive amount.

C. The new telemetry audit and penalty-fee provision (Sec. 5.1) should not be adopted without materiality thresholds, a cure period, and an exemption for data gaps caused by the DERMS or platform side.

The redlined Program Manual adds the following new sentence to Section 5.1 (Operational Control), which does not appear among the changes summarized in the Notice: "Any entity providing telemetry data in the Program may be subject to audits and/or penalty fees,

if data is not provided in the allowable timeframe and/or if there are data QC concerns." Program Manual Sec. 5.1.

The Program Manual already addresses missing or late telemetry data through the Performance Incentive calculation itself: Section 6.3 provides that "[l]apses in service that result in missing data during an event will result in performance being measured at 0 kW-AC for the duration of the missing data." Because a data gap already reduces the Performance Incentive earned for the affected interval, layering an additional audit and penalty-fee exposure on top of that reduction risks penalizing the same shortfall twice.

As drafted, the new sentence does not define what data delay or what category of "QC concern" would trigger an audit or penalty fee, does not specify a fee amount or schedule, and does not provide a cure period before a penalty is assessed. Nor does it distinguish a telemetry provider's own failure from a data gap caused by the DERMS platform or another Program Administrator system that is outside the telemetry provider's control. Base requests that, before this provision is adopted, the Authority direct the Program Administrators to specify: (i) a materiality threshold defining the delay or QC failure that triggers exposure to an audit or penalty fee; (ii) a reasonable cure period allowing a telemetry provider to correct a deficiency before a penalty is assessed; and (iii) an explicit exemption where the data gap originates on the DERMS or Program Administrator platform side rather than with the telemetry provider. Base does not object to reasonable accountability for data quality. Base's concern is that, without these clarifications, the provision introduces an open-ended compliance risk for TPOs, Operators, and Aggregators.

D. The Program rules should establish a pathway for fleet-level dispatch integration for BESS Operators.

The Program's design already frames Active Dispatch at the Operator level. Section 5.1.2 of the Program Manual provides that "the EDCs will provide notification to the BESS Operator via the DERMS at least 24 hours in advance of the start of the Active Dispatch event," and that "BESS Operators will be provided with the requested discharge level for the event. Actual performance will be verified based on data captured by the Customer's Operator and reported back to the DERMS." Program Manual Sec. 5.1.2. In practice, however, the Program's current DERMS implementation anticipates a direct, device-level control connection to each enrolled BESS.

Many BESS Operators and Aggregators already maintain their own distributed dispatch platforms through which they centrally control their fleets: the Operator receives a dispatch instruction, executes it across every enrolled device, and captures device-level telemetry in the process. For these fleets, a device-level control connection duplicates a control layer the Operator already provides and imposes a per-device integration burden on every enrollment, without yielding incremental grid or verification benefit, because performance is measured from device-level telemetry in either architecture. Base recognizes that not every aggregator maintains this capability, and a direct device-level connection through a centralized DERMs remains the appropriate default for those that do not.

Base requests that the Authority direct the Program Administrators to codify a fleet-level integration option in the Program Manual and associated implementation rules. Specifically, the Program Manual should provide that an Eligible BESS Operator or Aggregator may elect to satisfy the Program's dispatch requirements through a fleet-level integration in which (i) the Active Dispatch event — the event window, duration, and requested discharge level — is communicated to the Operator; (ii) the Operator executes the event across its enrolled BESS; and

(iii) the Operator reports telemetry for its portfolio for performance measurement and incentive verification. This structure preserves the EDCs' full control over when, where, and how much capacity is dispatched, preserves device-level measurement for settlement, and leaves the existing device-level connection in place for aggregators that do not operate their own dispatch platforms.

E. Standalone residential storage should receive equivalent treatment under the Section 4(a) budget framework, and no minimum size requirement should attach to the solar component of a paired system.

Section 4(a) of Public Act No. 26-127 establishes a combined annual target of 180 megawatts and $85 million per year, beginning January 1, 2028, across the residential clean energy successor programs and the storage program established at General Statutes § 16-243ee, and excludes from those targets residential solar photovoltaic systems paired with co-located storage that are shown, through a ratepayer impact measurement ("RIM") test developed by the Authority, to benefit all ratepayers. Standalone residential storage receives no equivalent treatment. Base has addressed this disparity in its comments in Docket No. 26-06-04, filed August 26, 2026, which Base incorporates by reference. Base raises the issue in this Year 6 review as well because enrollment and budget decisions made in this proceeding will set the ESS Program's trajectory into the period in which the Section 4(a) budgetary target begins to bind, and because the Authority's allocation determinations under Section 4(a) are due by December 1, 2027.

A carve-out conditioned on solar pairing confines the Act's uncapped deployment pathway to the subset of ratepayers whose homes can host a full rooftop solar array. Roof orientation, shading, structural condition, and roof age exclude a meaningful share of Connecticut homes from rooftop solar altogether. A standalone battery — or a battery paired

with a small, battery-attached solar module — can be sited at many more homes at materially lower installed cost and complexity. If the purpose of the Section 4(a) framework is to ensure that ratepayer-funded programs deliver benefits across the rate base, eligibility rules should maximize the portion of the rate base that can practically participate. At minimum, the Authority should decline to adopt any minimum size requirement for the solar component of a paired system, so that a small battery-attached array qualifies a system for the carve-out on the same terms as a full rooftop installation.

Stand alone storage does not only deliver accessibility benefits. Now, the form factor of stand alone storage can provide meaningful resiliency without solar. . The historical premise for favoring paired systems — that a standalone battery exhausts its charge during an extended outage while a paired system can recharge from co-located generation — reflects the small standalone form factors, typically five to ten kilowatt-hours, that were common when that framework was developed. Newer standalone form factors are materially larger: the systems Base deploys are 40 kWh, roughly four times the typical size, and provide multiple days of backup power for a typical residential load. In Base's Texas fleet, which experiences more frequent and longer-duration outages than Connecticut, systems of this class have provided coverage across the overwhelming majority of outage events. The Program's own storm protocol reinforces this: under Section 6.9, the EDCs cancel dispatch events for the two days preceding any predicted Emergency Restoration Plan-level event, so standalone systems enter major storms fully charged and reserved for the customer's use.

Standalone storage also carries a demonstrated, positive ratepayer impact. The Program's most recent evaluation results report a RIM ratio of 1.69, exceeding the Program's greater-than-1.4 design target. See Decision, Docket No. 25-08-05 (Dec. 17, 2025) at 30. A RIM

ratio above 1.0 means that non-participating ratepayers are net beneficiaries of each incentive dollar — precisely the criterion on which the Act's carve-out turns. The Connecticut Green Bank has itself proposed a technology-neutral, RIM-based exclusion from the budget cap. In the Authority's successor program study, the Connecticut Green Bank "suggested that the Authority could consider exempting combined solar and storage systems **and other projects that deliver ratepayer benefits (with a RIM score greater than 1)** from the budget cap." Final Report, Docket No. 25-02-14, at 70 (citing CGB Comments, Feb. 4, 2026, p. 3). Standalone residential storage with a demonstrated RIM score greater than 1 is such a project. Applying the Authority's RIM test to standalone residential storage on the same terms as paired systems would keep demonstrated ratepayer benefit, rather than technology type, as the basis for what counts against the cap.

Base therefore requests that the Authority, in its Year 6 decision, record its support for technology-consistent treatment under Section 4(a): standalone residential storage systems participating in the program at General Statutes § 16-243ee that satisfy the Authority's RIM test should be excluded from the Section 4(a) megawatt and budgetary targets on the same terms as paired solar-plus-storage systems, and, at minimum, no minimum solar system size requirement should be imposed as a condition of the existing paired-system carve-out.

III. Conclusion

Base thanks the Authority and the Program Administrators for their continued stewardship of the ESS Program and respectfully requests that the Authority consider the comments above in its Year 6 decision.

Respectfully submitted,

BASE POWER COMPANY

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August 28, 2026