CAE-029

The United Illuminating Company **Witness: Robert Whelan**
Logan Taricani

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Date Submitted: August 28, 2026

CAE-029 Q:

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-029 A:

Yes. A standalone front-of-the-meter ("FTM") energy storage resource could potentially take retail service under an existing non-residential tariff, such as UI's SG-2 rate[1], subject to satisfying the tariff's eligibility requirements and any applicable interconnection requirements.

However, while existing retail tariffs provide a mechanism for standalone FTM storage resources to purchase electricity from the EDC, UI is not aware of an existing retail tariff specifically designed to compensate such resources for exported energy. As discussed in UI's written comments and the August 7, 2026, technical meeting, the primary issue under consideration in this proceeding is that the current regulatory framework provides a means for standalone FTM storage resources to take retail service but does not include a dedicated retail tariff construct specifically addressing the charging and discharging characteristics of standalone FTM storage resources.

Accordingly, while a standalone FTM storage resource may be able to take service under an existing retail tariff, any compensation framework associated with exported energy would require additional regulatory review and tariff development beyond the provisions currently contained in existing retail service tariffs

[1] UI Rate Information