CAE-030

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

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CAE-030 Q:

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-030 A:

Yes. The response may differ if the front-of-the-meter ("FTM") storage resource is co-located with on-site generation, such as a solar PV facility, fuel cell facility, or other distributed generating resource.

Unlike a standalone FTM storage resource, a co-located storage resource may be associated with a generating facility that is already eligible to take service under existing tariffs applicable to distributed generation resources, including Self-Generator Rate ("Rate SG2") and the Net Energy Rider (NE Rider). Under the NE Rider, eligible distributed generation facilities may offset on-site consumption and sell net excess generation to the Company under Rate SG2.[1]

As a result, co-located generation and storage facilities may be subject to existing tariff, metering, and compensation structures associated with the underlying generation resource. The specific metering and compensation treatment would depend on the project configuration, applicable tariff eligibility requirements, and any regulatory approvals that may be required.

Accordingly, co-located resources may be subject to existing regulatory and tariff frameworks that are not available to standalone FTM storage resources. However, the existence of an associated generation resource does not necessarily resolve all regulatory, tariff, and retail service considerations associated with standalone FTM storage. Therefore, the regulatory and tariff treatment of a co-located resource may differ from that of a standalone storage resource depending on the specific project configuration, applicable tariff eligibility requirements, and metering arrangement.

[1] United Illuminating Pricing