CAE-034

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

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Date Submitted: August 28, 2026

CAE-034 Q:

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[1] 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-034 A:

UI agrees with the Energy Storage Industry Commenters that further evaluation of a retail tariff construct for standalone FTM storage resources is warranted and that stakeholder engagement would be beneficial if the Authority elects to pursue development of such a tariff. UI also agrees that certain concepts reflected in the WDAT[2] may be informative in evaluating future retail tariff design options.

UI has not completed sufficient analysis to support adoption of the commenters' specific proposals regarding hourly LMP-based pricing, transmission or capacity-related credits, treatment of non-bypassable charges, or metering requirements. Accordingly, UI neither supports nor opposes those specific proposals at this time but believes additional analysis would be required to evaluate their consistency with applicable ratemaking principles, cost allocation methodologies, and regulatory requirements.

[1] Energy Storage Industry Commenters - Written Comments July 9, 2026
[2] Docket No. 22-08-05 Order No. 9 Compliance Filing Working Group Report December 29, 2023