STATE OF CONNECTICUT
PUBLIC UTILITIES REGULATORY AUTHORITY

ANNUAL ENERGY STORAGE SOLUTIONS PROGRAM REVIEW – YEAR 6	:	DOCKET NO. 26-08-05
	:	
	:	AUGUST 27, 2026

WRITTEN COMMENTS OF THE UNITED ILLUMINATING COMPANY

The United Illuminating Company ("UI" or the "Company") provides the following Written Comments, in response to the Notice of Request for Written Comments (the "Notice"), issued by the Public Utilities Regulatory Authority ("PURA" or the "Authority") on August 12, 2026, in the above captioned docket.

The Notice requests that docket participants file written comments concerning two topics: the Program Administrator's Recommended Programmatic Changes and the Bidirectional Electric Vehicle Working Group Final Report.

1. Recommended Programmatic Changes

BACKGROUND

The Connecticut Green Bank, Eversource Energy, and UI (collectively, "the Program Administrators" or "the PAs") proposed several modifications to the Energy Storage Solutions ("ESS") Program Manual in Attachment 4 of the Program Administrators' Compliance with Standing Order 3. Overall, these proposed changes are reasonable, administrative in nature, and aid in advancing the ESS Program's foundational objectives established in the Final Decision, issued on July 1, 2021 in Docket No. 17-12-03RE03 (the "Storage Decision"). Specifically, the recommendations support continued delivery of ratepayer benefits, facilitating the deployment of distributed storage resources, reducing barriers to participation, further improving program administration, and preserving market confidence.

a. Alignment with Objective 1: Positive Net Present Value for Ratepayers

Program Objective 1 of the Storage Decision directs the Program to provide positive net present value to ratepayers. Several proposed modifications within the Program Manual improve program efficiency and reduce administrative burden without proposing modified incentive levels or expanding ratepayer obligations. The removal of passive dispatch enrollment provisions, clarification of enrollment requirements, consolidation of legacy program information into supplemental materials, and streamlining of program documentation reduce administrative complexity and implementation costs. Likewise, the removal of annual performance incentive payments reflects practical limitations of DERMS administration and is expected to streamline customer program performance comprehension without materially affecting customer performance incentive disbursement. These proposed modifications help ensure that the program administrators remain focused on delivering measurable grid and customer benefits while maintaining prudent use of ratepayer funds.

b. Alignment with Objective 2: Multiple Grid Benefits

The ESS Program was designed to provide multiple grid benefits, including peak reduction, increased resilience, and support for distributed energy resources. The proposed operational revisions to allow for alternative communications protocols where OpenADR integration is not feasible can continue to encourage expanded participation by aggregators, operators, and original equipment manufacturers that may otherwise be unable to participate. Increasing the number and diversity of integrated storage assets enhances the ability of the Program to deliver reliable grid services and maintain active participation during peak reduction events. Additionally, enhanced provisions allowing case-by-case add-on systems and reasonable change orders may facilitate incremental storage deployment that can increase available grid capacity over time.

c. Alignment with Objective 3: Sustained and Orderly Development of Connecticut's Storage Industry

Many of the proposed changes directly support Program Objective 3 of the Storage Decision. The establishment of the broader "Eligible Provider" definition, clarification of participant roles, modernization of payment beneficiary provisions, transfer flexibility, improved enrollment procedures, and accommodation of add-on systems reduce uncertainty for contractors, third-party owners, aggregators, lenders, and customers. These changes increase the ease of customer participation and increase forecasting outlooks, while also preserving program controls.

d. Alignment with Objective 4: Resilience for Priority Populations

While the proposed modifications are primarily administrative, they support resilience objectives by reducing administrative hurdles that could otherwise delay project development. More efficient enrollment pathways, clearer eligibility timelines, accommodation of system expansions, and reasonable project change order provisions allow for eligible customers to successfully complete projects and receive resilience benefits associated with storage ownership. Continued program accessibility remains important for underserved, low-income, and resilience-focused customer segments.

e. Alignment with Objective 5: Lowering Barriers to Storage Deployment

Program Objective 5 of the Storage Decision receives the largest impact overall from the PAs proposed program modifications. The revisions simplify enrollment requirements, clarify eligibility deadlines, modernize insurance requirements, provide flexibility for legacy customers seeking system expansions, allow reasonable project modifications, and reduce administrative ambiguity through the Program Manual.

The proposal to measure the six-month enrollment incentive eligibility period from approval-to-energize regardless of provider approval status establishes a straightforward and easily comprehended rule. Similarly, the proposed add-on battery provisions and reasonable change-

order accommodation address practical issues encountered by customers and contractors after project approval. These reforms reduce avoidable market friction while preserving program integrity.

f. Alignment with Objective 6: Environmental Benefits

Although the recommended changes do not directly modify dispatch requirements or incentive structures associated with emissions reductions; they support continued deployment of battery storage systems that further reduce reliance on fossil-fuel peaking resources and facilitate greater integration of renewable generation resources. By improving participation pathways and lowering administrative burdens, these changes can incrementally contribute to additional storage adoption and their associated environmental benefits.

g. Alignment with Objective 7: Maximizing Wholesale Capacity Market Benefits

The proposed modifications preserve the Program's existing operational structure while allowing additional flexibility in communications and participant administration. By supporting participation from aggregators, operators, and third-party owners, the changes may improve the ability of enrolled resources to perform consistently and deliver capacity-related value. Improved market participation and operational reliability ultimately support the Program's goal of maximizing benefits derived from storage participation while maintaining benefits for Connecticut ratepayers.

CONCLUSION

The Program Administrator's recommended modifications are generally administrative refinements that reflect lessons learned during ESS Program implementation and the continued evolution of Connecticut's energy storage market. Collectively, the proposed changes advance multiple ESS Program Objectives, particularly Objectives 1, 3, and 5 by improving administrative efficiency, reducing barriers to participation, enhancing market certainty, supporting continued

investment and deployment of distributed energy resources. The proposed revisions maintain the core structure and policy established by PURA while providing the flexibility needed to support continued program growth and effective administration. UI recommends the Authority proceed with the approval of the Program Administrator's recommendations as proposed.

2. Bidirectional Electric Vehicle (EV) Participation

UI appreciates the extensive work completed by the ESS Program Administrators, Customized Energize Solutions, Working Group participants, and PURA staff regarding the potential integration of bidirectional electric vehicles ("V2G") into the ESS Program. UI would like to reinforce the support for the PA recommendations and agreement that the final report establishes a thoughtful, data-driven framework for incorporating V2G assets into Connecticut's ESS Program and distributed energy resource landscape.

UI agrees with the PA conclusion that a phased approach is the most prudent path forward. The report highlights that while commercial applications including electric school bus and other fleet deployments have demonstrated increasing technological maturity, residential V2G deployments continue to face unresolved questions regarding customer behavior, interoperability, DERMS coordination, interconnection processes, managed charging interactions, metering requirements, and co-located distributed generation. The PAs determined that these issues must be comprehensively addressed prior to opening the ESS program to broader, residential participation.

Specifically, UI supports the recommendation to allow the enrollment of qualifying commercial EVSE beginning with the 2027 ESS season, subject to the proposed eligibility requirements, including installation behind a commercial meter, a minimum discharge capability of 20kW per port, and exclusion from simultaneous participation in the light-duty Managed Charging Program. The report appropriately identifies commercial fleet operators as the most

mature and operationally capable initial participants, offering the greatest likelihood of delivering measurable grid benefits while allowing the PAs to gain practical implementation experience.

UI further agrees that the ESS and Managed Charging Program participation should not be combined until the significant operational and customer experience challenges identified by the Working Group have been resolved. The report appropriately recognizes that unmanaged interactions between charging and discharging programs could cause conflicting dispatch signals, increased customer confusion, technology integration challenges, and encourage adverse charging behaviors that undermine both program's objectives. Given the importance of maintaining customer confidence in V2G technologies, UI agrees that these challenges must be addressed prior to dual participation approval being granted.

Additionally, UI supports the recommendation to maintain alignment with ongoing interconnection efforts to gain experience from both the Connecticut Innovative Energy Solutions pilots and the Massachusetts Clean Energy Center V2X demonstration prior to expanding participation to residential customers. The findings documented in the report demonstrate that real-world deployments continue to identify issues involving interoperability, metering, communications standards, solar co-location, and interconnection requirements that should be better understood before a statewide expansion were to occur.

Most importantly, UI notes that the Working Group's discussions repeatedly demonstrated that V2G implementation extends far beyond the scope of any single PURA proceeding. As documented throughout the report, V2G intersects with ESS program design, Managed Charging, EV charging tariffs, make-ready incentives, the Medium and Heavy-Duty EV Program, interconnection requirements, distributed generation policies, telemetry standards, DERMS

integration, and future renewable compensation frameworks. The breadth of these interactions makes it incredibly difficult to comprehensively address V2G issues within existing dockets.

UI supports the Program Administrators' recommendation that PURA consider establishing a dedicated V2G proceeding to address the broader policy, program design, managed charging, interconnection, and implementation issues associated with bidirectional vehicles. A dedicated V2G docket would provide a centralized forum to resolve these issues in a coordinated manner rather than addressing them through multiple proceedings.

UI therefore encourages PURA to adopt the PAs phased implementation recommendations, authorize the commercial rollout for 2027, and establish a dedicated V2G proceeding in 2027 to serve as the primary avenue for addressing the broader policy and implementation questions necessary to support long-term V2G deployment in Connecticut.

Respectfully submitted,

THE UNITED ILLUMINATING COMPANY

By: *Alex E. Soter*

Alex E. Soter
Counsel
UIL Holdings Corporation
180 Marsh Hill Road
Orange, CT 06477
Phone: 203-836-4603
Email: alex.soter@avangrid.com

CERTIFICATION

I hereby certify that on August 28, 2026, the foregoing document was filed with the Public Utilities Regulatory Authority, and copies of the foregoing document were served upon each person designated on the Authority's official service list in this proceeding in accordance with R.C.S.A. § 16-1-15.

By: *Alex E. Soter*
Alex E. Soter
Counsel