July 9, 2026

Jeffrey R. Gaudiosi, Executive Secretary
Public Utilities Regulatory Authority
10 Franklin Square
New Britain, CT 06051

Docket No. 26-08-05 – Annual Energy Storage Solutions Review – Year 6 – CPower Comments in response to Notice of Request for Written Comments

Dear Mr. Gaudiosi,

CPower submits the following comments in response to the Public Utilities Regulatory Authority's June 16, 2026 Notice of Request for Written Comments ("Notice") on specific issues pertaining to the Energy Storage Solutions (ESS) Program.

CPower became part of NRG Energy, Inc. in January 2026. NRG is a leading provider of electricity, natural gas, and smart home solutions to eight million customers across North America. Together, CPower and NRG manage more than 8 GW of demand response and virtual power plant capacity. The comments below reflect the perspective of our combined organizations, which together serve a broad customer base spanning the residential and commercial and industrial (C&I) sectors.

Comments

1. **Enrollment Incentive Clawback**

    a. ***The Authority specifically requests comments on: (1) whether the expected ratepayer benefits of an enrollment incentive clawback mechanism outweigh the associated costs to participants and Program Administrators; (2) how responsibility for repayment should be allocated in cases of early disenrollment; and (3) whether such a requirement should apply universally or be limited to particular customer classes or incentive thresholds.***

CPower has no objection to a pro rata clawback of the enrollment incentive for commercial and residential customers that exit the program before the end of their 10-year term. Because a commercial battery's economic viability is premised on continued participation in the ESS program, it is unlikely that commercial batteries will drop out of the Program before the end of their term. The exception to this would be if catastrophic damage occurred to the battery, making it impossible for it to participate in the Program. In this unlikely event, ratepayers would no longer be benefiting from the battery and therefore it would be appropriate to claw back a pro rata share of the enrollment incentive. The same applies to residential batteries. If they drop out of the program before the end of their term, ratepayers will no longer realize the associated benefits and therefore it is appropriate to require the return of a pro rata share of the enrollment incentive.

Clawback charges should be charged to the entity on record receiving payments at the time the clawback is levied, *not* the entity that was on record for receiving payments when the battery enrolled. This ensures that the party responsible for the battery at the time it drops out is charged. It should also reduce the cost of administering the clawback.

Conclusion

CPower appreciates this opportunity to provide comments in the Year 6 review of the ESS Program and looks forward to working with the Authority and Program Administrators to enable the continued success of the Program.

Respectfully,



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