Date Submitted: August 28, 2026

CAE-020 Q:

Program Administrator Order No. 20 Compliance, Att. 1, pp. 63–64.

For each milestone identified in the Bidirectional EV Report as a prerequisite for residential participation, identify the specific measurable criteria that the Program Administrators believe should be satisfied before recommending residential bidirectional EV eligibility.

CAE-020 A:

UI believes that residential bidirectional EV eligibility should be considered only after further investigation into the technical, operational, regulatory, and market-readiness of this customer class. UI is looking to gather similar data points to aid in the implementation of residential bidirectional EVs from the Bidirectional Energy and MassCEC V2X pilots, consisting of successful bidirectional interconnection approval, DERMS connections capable of dispatching EVSE assets during peak reduction events, delivery of measurable demand reductions, and overall customer satisfaction within the pilots. While some of the previous metrics may be difficult to quantify, UI believes that without thoroughly investigating each metric, the ESS program would be prematurely making a substantial programmatic investment for a very niche subset of customers.

Broader eligibility should be informed by additional experience implementing the recently developed interconnection framework for bidirectional EVs and by further resolution of outstanding questions related to metering requirements, distributed generation program interactions, renewable energy credit treatment, export data validation, and the participation of resources located at sites with co-located solar generation. In the case of the GridEdge IES Pilot, a single EVSE was approved for bidirectional dispatch through a custom interconnection process but was ultimately reconfigured to service on-site load (V2X) due to a solar tariff conflict. Having an avenue for projects co-located with on-site generation to participate in the ESS program with V2G enabled EVSE's would allow for broader customer participation and increase ESS Program opportunities.

Additionally, a specific, workable framework for dual participation in ESS and Managed Charging is necessary before broader enrollment is recommended. This includes addressing enrollment, dispatch coordination, customer communications, state-of-charge management, technology integration, and administrative considerations to ensure customers can participate in both programs without creating operational conflicts, customer confusion, or adverse impacts on program performance.

Finally, UI believes that all future recommendations regarding expanded eligibility should be informed by continued evaluation of market conditions, including residential bidirectional EV adoption trends in other states, overall EV customer interest, expected V2G participation levels, and available cost data. This may include reviewing available results from ongoing pilots and demonstrations, engaging with DERMS providers and other jurisdictions that have implemented comparable programs, assessing the scale of the residential bidirectional EV market, and gathering additional information regarding customer driving patterns, charging behavior, and willingness to participate in a V2G program.

Collectively, these efforts will provide the information necessary to assess whether broader residential bidirectional EV participation can be effectively implemented in a manner that is administratively feasible, provides measurable grid benefits, is cost-effective, and supports a positive customer experience, all of which must align with the ESS Program Objectives.