Company
Docket No. 26-08-05
Response to Interrogatory CAE-21
Date of Submission: August 28th, 2026
Witness: Sergio Carrillo Connecticut Green Bank

Question:

CAE-21 Program Administrator Order No. 3 Compliance, Aug. 3, 2026, Att. 2, p. 18. Explain whether the identification of unresolved data quality issues affecting 4% of telemetry data impacted the accuracy of performance incentive payments or the applicability of upfront incentive clawbacks.

Response:

For purposes of the determination of upfront incentive clawbacks, the Green Bank deployed a data review process that was generally similar to the quality control ("QC") process described by Customized Energy Solutions ("CES"), but with an important methodological distinction reflecting the different purposes of the two analyses. CES conducted its QC process for purposes of the Evaluation, Measurement, & Verification ("EM&V") analysis and excluded project-event observations that did not satisfy specified data-quality thresholds. As described in the Program Administrator Order No. 3 Compliance filing, approximately 4% of total event rows were eliminated from CES's analysis based on those criteria.

The Green Bank, by contrast, did not eliminate project-event data from the calculation of upfront incentive clawbacks because of data-quality deficiencies. The Green Bank's clawback calculation methodology is intended to determine whether a participating project satisfied the performance requirements associated with receipt of an upfront incentive. Accordingly, the Green Bank used the available telemetry data as reported and, where required data were missing or unavailable, treated the missing values as zero for purposes of calculating performance.

This approach is intentionally conservative from the perspective of the ESS Program and ratepayers. Rather than excluding a project-event from the clawback calculation when telemetry is missing or fails a QC check, assigning a zero to missing data reduces the project's calculated performance for the applicable event and therefore may result in a higher, rather than lower, clawback amount. In other words, unresolved data quality issues do not provide a project with the benefit of having a poorly performing or undocumented event removed from the calculation. This methodology protects the interests of the ESS Program and ratepayers by ensuring that incentive recipients bear the consequences of an inability to demonstrate performance through the telemetry required under the Program.

The Green Bank recognizes that CES identified data-quality issues resulting in the exclusion of approximately 4% of event rows from its EM&V analysis. Whether that percentage is material for purposes of the EM&V analysis is appropriately addressed by CES in the annual EM&V report. For purposes of the Green Bank's upfront incentive clawback calculation, however, the Green Bank does not believe that the identified data quality issues have a material adverse impact on the accuracy or applicability of the clawbacks. This conclusion is supported by both the relatively limited proportion of affected telemetry and, more importantly, the Green Bank's

Company
Docket No. 26-08-05
Response to Interrogatory CAE-21
Date of Submission: August 28th, 2026
Witness: Sergio Carrillo Connecticut Green Bank

methodology of retaining the affected project-events in the calculation and assigning zero values where required data are missing, rather than excluding those observations.

Where data quality issues can be corrected, the Green Bank may also bring such issues to the attention of the applicable OEM so that corrected or updated data can be provided through the DERMS or directly to the Green Bank, subject to applicable deadlines such as the clawback order. Nevertheless, because clawback determinations must be completed within the schedule established by PURA, the Green Bank cannot indefinitely delay those calculations pending the correction of telemetry. Where corrected data is not available by the applicable calculation deadline, the Green Bank relies upon the data provided and is available at that time.

Finally, with respect to performance incentive payments, those calculations are performed by the EDCs, with support from their respective Distributed Energy Resource Management Systems (“DERMS”) providers. The Green Bank does not perform the detailed calculations underlying those payments. Accordingly, the Green Bank is not in a position to determine whether the telemetry issues identified by CES affected the accuracy of performance incentive payments and therefore cannot opine on that portion of the interrogatory. The EDCs are better positioned to address the QC procedures applied to performance incentive calculations and the treatment of missing, erroneous, or otherwise deficient telemetry in determining such payments.