August 28, 2026

Via Electronic Filing and Service

Jeffrey R. Gaudiosi
Public Utilities Regulatory Authority
10 Franklin Square
New Britain, Connecticut 06051

RE: Docket 26-08-05 Annual Energy Storage Solutions Program Review - Year 6 – Written Comments

Dear Mr. Gaudiosi,

Earthlight Technologies, LLC respectfully submits these written comments for filing in Docket 26-08-05. Please contact me with any questions regarding this filing.

Respectfully submitted,

/s/ Sean Riel
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STATE OF CONNECTICUT
PUBLIC UTILITIES REGULATORY AUTHORITY

Annual Energy Storage Program	**:**	**Docket No. 26-08-05**
Review – Year 6	**:**	**August 28, 2026**

EARTHLIGHT TECHNOLOGIES, LLC WRITTEN COMMENTS IN RESPONSE TO NOTICE

Earthlight Technologies, LLC ("Earthlight") submits these written comments to the Public Utilities Regulatory Authority ("Authority") in response to the *Notice of Written Comments* issued in this docket on August 28, 2026. As a leading provider of energy storage solutions for homeowners and businesses, we appreciate the opportunity to provide these comments to inform future changes in the Energy Storage Solutions ("ESS") program.

I. Recommended Programmatic Changes

a. *Removing or Relocating Passive Dispatch Provisions from the Program Manual*

Earthlight supports removing references to the legacy Energy Storage Solutions ("ESS") program from any new modifications to the Program Manual. The legacy Program Manual should remain accessible on the Program website for legacy customers to view and reference, but separating the legacy rules from the new Construct 5 rules will bring needed clarity for homeowners and businesses interested in installing energy storage.

At the same time, the Year 5 Decision may have unintentionally introduced a new active dispatch requirement for customers enrolled under the legacy program, and the difference in winter-season active dispatch requirements warrants closer examination. Customers enrolled in the legacy program did so under Program Manual rules providing that their systems would be called for between one and five events during the winter season, while customers enrolled under Construct 5 may have their batteries called between one and ten events during the winter season. As Earthlight indicated in its written exceptions in

Docket 25-08-05[1], we believe this increased requirement should not be applied retroactively to legacy customers. Earthlight is interested to learn how the Program Administrators' DERMS platforms can distinguish between systems enrolled under the legacy and Construct 5 programs to ensure homeowners and businesses are not unfairly burdened with new requirements.

b. *Removing the Annual Payment Option and Transitioning to Biannual Payments*

Earthlight supports removing the annual payment option from consideration. Maintaining a biannual payment structure would bring Construct 5 customers into greater alignment with legacy customer payments, streamlining operations for the Program Administrators. An annual payment structure simply does not make sense: if a system is energized between the summer and winter dispatch seasons, the system owner could theoretically lose a substantial amount of incentive income in the first year for an arbitrary reason[2]. Biannual incentive payments provide system owners with tangible value earlier, allowing them to see the benefit of their grid-dispatch efforts. By shortening the payment timeframe, the Program can also help consumers modify their own behavior toward fuller participation in active dispatch, particularly where a customer's first seasonal payment was lower due to opting out of multiple events.

c. *Revising the Direct Payment Beneficiary Form*

Earthlight does not oppose recognizing eligible institutional payment beneficiaries, including financial institutions, as recipients of performance incentives.

d. *Clarifying the Six-Month Deadline for Obtaining an Enrollment Incentive*

Earthlight does not oppose this clarification as drafted.

e. *Allowing Add-On Battery Systems for Legacy Passive Dispatch Customers*

Earthlight has received significant interest from customers seeking to add energy storage capacity to their existing storage installations, all of whom are enrolled under the legacy program. Earthlight has

[1]See Earthlight Technologies, LLC Written Exceptions in Response to Notice, Dec. 5, 2025, Docket No. 25-08-05
[2]Ibid

been in communication with FranklinWH regarding the technical infeasibility of a single gateway controlling multiple batteries across multiple dispatch programs (i.e., the legacy program and Construct 5).

Earthlight recommends an approach that would allow system owners to add energy storage through one of two pathways, preserving optionality for the system owner and/or original equipment manufacturer ("OEM"):

1. Adding additional storage capacity through the same legacy program as the originally installed storage. The system owner would not receive an enrollment incentive, but the entire storage system would be eligible to dispatch under the legacy active dispatch compensation structure; or
2. Adding additional storage capacity and reenrolling the existing capacity from the legacy program into Construct 5. The system owner would receive an enrollment incentive for the new system, and the entire storage system would be eligible to dispatch under the Construct 5 active dispatch compensation structure, with the homeowner paying a prorated portion of the incentive back to the Connecticut Green Bank in exchange for the higher active dispatch incentives available under Construct 5.

f. *Allowing Reasonable Change Orders for Projects Approved Through Legacy Program Tranches*

Earthlight supports giving the Program Administrators discretion to allow systems with previously reserved incentives to continue enrollment through the legacy program via reasonable change orders. As interconnection issues continue to place pressure on developers and system owners to modify the size of solar and storage installations[3], flexibility for change orders is necessary so that system owners do not lose access to previously reserved incentives.

[3]See Letter from Office of Education, Outreach, and Enforcement, Aug. 26, 2026, Docket No. 26-06-04, Implementation of Clean Energy Successor Programs, at 1–4 (describing persistent interconnection barriers, including lengthy timelines and cost-estimate uncertainty, that constrain project development).

g. *Alternative Communication Protocols Where OpenADR Integration Is Not Feasible*

Earthlight makes no comments regarding alternative communication protocols.

II. Bidirectional Electric Vehicle (EV) Participation

Earthlight makes no comments regarding bidirectional EV participation in the ESS Program at this time.

III. Conclusion

Earthlight appreciates the opportunity to provide these written comments to the Authority for the 26-08-05 Annual Review.

Respectfully submitted,
Earthlight Technologies, LLC

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