


# Docket No. 26-08-05
# Annual Energy Storage Solutions Program Review—Year 6
# Technical Meeting #2

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EVs represent **untapped potential** beyond mobility as distributed energy resources to support an affordable and decarbonized electric grid

# VGIC Supports the Majority of the PAs Recommendations in the Report

- **VGIC supports the proposed implementation framework**
  - EVSE as the unit of enrollment
  - DERMS integration
  - Port-level telemetry
  - Existing QPL framework
  - No mandatory backup-power requirement
  - Technology-neutral eligibility for AC and DC bidirectional charging systems

# VGIC Supports the Majority of the PAs Recommendations in the Report

- **VGIC supports pure performance-based compensation**
  - Customers earn when they actually perform during ESS events
  - If a vehicle is unavailable, ratepayers are not paying for unavailable capacity
  - VGIC supports using existing ESS rates, no separate enrollment incentive, and the existing ten-year rate lock

# Technical Requirements: Preserve Flexibility as Standards Mature

- UL 9741 should not be required where it is not applicable.
  - AC-coupled systems certified through the new UL 1741 SC / SAE J3072 pathway satisfy IEEE 1547-2018 requirements without UL 9741.
  - A blanket UL 9741 requirement could therefore exclude otherwise compliant AC bidirectional charging systems.
- ISO 15118-20 should not become a rigid near-term eligibility requirement.
  - Amendment 1 addressing bidirectional power transfer was published only in July 2026, while testing tools, certification processes, labs, and interoperability experience are still developing.
- Maintain protocol neutrality
  - SAE J3072 supports multiple open, interoperable EV–EVSE communication approaches; **VGIC recommends avoiding premature selection of a single pathway that could strand otherwise functional equipment as the market evolves.**

# Allow Residential Participation in ESS Program for Program Year 6

- **The Residential Market Is Ready and Offers Meaningful Scale**
  - VGIC identifies 20 passenger EV models already offering grid-parallel bidirectional charging features
  - Compatible residential systems are commercially available from multiple automakers and charging providers
  - The number of available vehicle and charger models has more than doubled in roughly 12 months
  - DERMS integration and existing QPL models can help manage the administrative burden of scaling participation

# Estimated Aggregate Bidirectional Charging Capacity Based on CT Vehicle Registration Data

| | Vehicles | kW/vehicle | Aggregate capacity |
|---|---|---|---|
| Connecticut bidirectional EVs registered through 2024: nameplate capacity | 3,077 | 11 kW | 33.8 MW |
| Connecticut bidirectional EVs registered through 2024: nameplate capacity: at NLR 53% availability assumption and 2.12 kW realized contribution | 1,631 | 2.12 kW | 3.5 MW |
| If the entire current Connecticut EV fleet were leveraging bidirectional charging systems: at NLR 53% availability assumption and 2.12 kW realized | 38,556 | 2.12 kW | 81.7 MW |

# Allow Residential Participation in ESS Program for Program Year 6

- **Performance-Based Design Protects Ratepayers**
  - Residential availability may be less predictable, but ESS pays only for actual performance
  - Vehicles that miss an event simply do not earn for that event
  - The PAs conclude existing performance rates should avoid adversely affecting the program RIM
  - Uncertain availability/behavioral response further supports pay-for-performance

# Allow Residential Participation in ESS Program for Program Year 6

- **Proposed Milestones Do Not Justify Delaying Residential Eligibility**
  - ***Pilots*: IES and MassCEC projects are already generating lessons, with most of the key implementers directly involved in the Working Group**
  - ***Managed charging***: Temporarily prohibit dual participation if necessary; customers can elect ESS participation
  - ***Interconnection***: The same framework applies to residential and commercial systems
  - ***Solar/metering***: Issues affect certain configurations and are not unique to bidirectional EV charging systems
  - **Delaying eligibility risks reinforcing the "chicken-and-egg" market-development problem**

# Approve the EDCs' proposed Order No. 25 interconnection revisions

- Technology neutrality
  - The proposal appropriately recognizes both DC-coupled systems using UL 1741 SB and AC-coupled systems using either UL 1741 SC/SAE J3072 or the UL 1741 Certification Requirement Decision (CRD) for Multipiece DER Systems
- The proposed revisions provide a clear pathway and reduce case-by-case uncertainty
  - Similar approaches are already being implemented in other jurisdictions.
- Allow refinement through experience
  - Minor refinements can be made as the EDCs gain implementation experience.

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Vehicle Grid Integration Council (VGIC) is a national 501(c)(6) membership-based trade association committed to advancing the role of electric vehicles and vehicle-grid integration through policy development, education, outreach, and research.

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