August 28, 2026

Via Electronic Filing

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

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

Dear Mr. Gaudiosi,

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

Respectfully,
/s/ Dominic Gatti
Dominic Gatti
Energy Policy Advisor
Tesla Inc.
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STATE OF CONNECTICUT
PUBLIC UTILITIES REGULATORY AUTHORITY

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

TESLA, INC. WRITTEN COMMENTS IN RESPONSE TO NOTICE

Tesla, Inc. ("Tesla") respectfully submits these written comments in response to the Public Utilities Regulatory Authority's ("PURA" or "the Authority") Notice of Request for Written Comments issued in this docket on August 12, 2026. Tesla's mission is to accelerate the world's transition to sustainable energy through the deployment of electric vehicles and sustainable energy products, including residential solar energy and battery energy storage systems ("BESS"). Tesla is the top residential battery provider participating in the ESS Program, and its residential BESS, the Powerwall, comprises a majority of the U.S. residential battery market. Tesla is also a nation-leading manufacturer of electric vehicles with grid-parallel bidirectional charging capability.

Bidirectional EV Participation

Tesla is grateful for the thoughtful and constructive dialogue facilitated by Customized Energy Solutions ("CES") and the Program Administrators ("PAs"), and for PURA's direction to undertake this effort. We largely praise the Bidirectional EV Working Group Report ("Report") and believe it is an accurate and actionable summary of the state of play and the advisable path forward. As voiced in Tesla's Working Group participation and in conversations with the PAs, we believe that the few remaining challenges are best solved in practice, and PURA should allow residential bidirectional EV ("V2G") systems to participate in ESS for Program Year 6 (2027).

Tesla wholeheartedly endorses the Vehicle-Grid Integration Council's ("VGIC") comments in this proceeding. These comments should be considered supplemental to VGIC's input on market conditions, technical considerations, and programmatic changes. The following answers and recommendations layer Tesla's insight, as a nation-leading EV manufacturer and the top residential battery provider in the ESS Program, on top of VGIC's thorough record.

a. Whether participation in the ESS Program provides greater overall benefits to ratepayers than participation in Connecticut's managed charging program for bidirectional EVs, assuming participation would be limited to a single program.

Yes. A program that enables the PAs to dispatch resources to meet grid needs with the larger capacity of a V2G system is more beneficial than the load-shaping that currently characterizes the managed charging program. Dispatching up to 11.5 kW per available V2G system is far more useful to the grid than zeroing out charging, and Tesla endorses VGIC's per-vehicle analysis demonstrating this difference in the depth of event response.

Tesla maintains that it is unnecessary to limit customers to participating in a single program. As the Report discusses, there is no inherent tension between managed charging and V2G programs; the challenges that need to be worked out are contractual rather than programmatic in nature. However, if prohibiting participation in both the managed charging (V1G) and V2G programs for the first year of V2G in ESS is the only way to allow these powerful DERs to serve the grid, PURA should do what is necessary to begin the process of creating a more comprehensive, impactful, and streamlined ESS Program that includes V2G.

b. Whether eligibility should initially be limited to commercial bidirectional EVs or whether residential bidirectional EVs should also be eligible beginning in Program Year 6.

No, eligibility should not be limited to commercial V2G systems for Program Year 6. The technology and behavior of V2G systems have matured enough for widespread use, scale is within line of sight, and the program structure and integration approach inherently protect ratepayer interests.

The recent codification of UL certification pathways and the successful launch of programs in Texas and California prove that the technology is ready and is waiting only on programmatic inclusion to scale elsewhere. Tesla can also attest that the 30% availability assumption cited in the Report is reasonable, if not conservative: current plug-in behavior indicates that more than 30% of our customers have their vehicles plugged in during last year's event hours, at a state of charge that leaves sufficient kWh to discharge. Specific details of vehicle availability for our current Connecticut fleet were shared confidentially with CES and the PAs. It is reasonable to assume that customers participating in ESS with their V2G systems would have a higher availability than the average Tesla owner.

In addition to the growth in availability and adoption of bidirectional EVs described by VGIC, Tesla can confirm that we have recently expanded bidirectional capability from Cybertruck to include specific trims of the Model Y, and we will continue to increase the number of models with this feature in the near future.

While Tesla appreciates the PAs' concerns regarding the cost-effectiveness of including different vehicle classes, we point out that PURA's program design, the adoption of the EDC-recommended interconnection rules, and the DERMS integration requirement adequately protect Connecticut ratepayers. Customers are paid only for the services they actually perform; the updates necessary to implement the V2G interconnection standards will work for residential systems as well; and the ability to integrate with a DERMS platform is a reasonable standard that will lessen the lift for the PAs. PURA should not shy away from including residential V2G systems on the grounds of cost-effectiveness concerns because they are mitigated by the Report's suggestions.

c. Whether residential bidirectional EVs should be eligible at this time, and, if not, suggest what milestones or conditions should be satisfied before they are incorporated into the ESS Program.

Yes, residential V2G systems should be eligible to participate in Program Year 6 (2027). Tesla refers to VGIC's thorough walkthrough of why the gating criteria presented in the Report are already satisfied, unnecessary, or irrelevant, and adds that an additional year of waiting and reporting will not yield a fraction of the growth and learning that allowing residential systems to participate will.

Additionally, Tesla points out that the real outstanding concerns involve co-participation with another PURA-administered program: managed charging, active and passive. While we maintain that co-participation will not be a major issue, we are open to initially including only residential vehicles that are not participating in those programs for the first few years. PURA could direct the PAs and stakeholders to resolve related challenges over the next year, building on the highly productive work of the last six months.

There is significant opportunity to bring capacity online, especially with the new offerings noted by VGIC and Tesla, and we should let customers and technology providers with straightforward configurations begin to prove themselves now. These issues will not be meaningfully resolved without a driving factor; allowing eligible, uncomplicated configurations to participate first is precisely the way to create the industry and customer interest that produces solutions for the harder cases.

d. Whether the Report's recommended technical requirements, including DERMS integration, telemetry requirements, UL certification requirements, and ISO 15118-20 communications standards, are appropriate given current market readiness, interoperability, implementation costs, and expected ratepayer benefits.

Tesla supports the technical requirements enumerated in the Report, but believes it is crucial that PURA adhere in its final order to the nuanced points the Report articulates, especially as they relate to communication standards and interoperability.

Tesla requests that PURA treat communication standards as guidelines rather than requirements; at a minimum, PURA should enshrine the Report-suggested ability of the PAs to grant exemptions from communication-standard requirements. The Report is correct to identify ISO 15118-20 and the interrelated SAE J3072 standards as emerging protocols that help the industry converge on interoperable devices. The Report is also correct that some OEMs, including Tesla, have developed proprietary protocols that deliver higher safety and customer-usability functions but are not open standards. Tesla is working toward enabling these open standards in our devices, but chose a proprietary approach because our efforts preceded those undertaken by SAE and ISO.

Similarly, we request that PURA endorse all three certification pathways identified in the Report: UL 1741 CRD, UL 1741 SB, and UL 1741 SC. Tesla uses the UL 1741 CRD for Multipiece DER Systems, which allows us to deliver some of the most advanced grid services by leveraging the unique experience we have with other multipiece DER systems, namely our stationary

storage product. We believe all safe and effective certification pathways for both AC- and DC-coupled systems should be recognized by PURA, and we call special attention to UL 1741 CRD so that Tesla can participate in the Program. In each case, Tesla has developed and deployed systems that deliver equivalent or better safety and interoperability performance within our product ecosystem.

Lastly, Tesla endorses the prerequisite that a V2G system must be able to integrate into an edge DERMS platform so it can be dispatched efficiently. As Tesla has discussed throughout this program review process over the years, the details of how that integration is accomplished should be left to the contracts executed by the PAs, so that they retain the flexibility to utilize the best commercially available options.

e. Whether any additional modifications to the ESS Program or the proposed bidirectional EV interconnection process are necessary to facilitate cost-effective participation while maintaining Program integrity and protecting ratepayers.

As discussed above, the main modification Tesla requests is to allow residential vehicles to participate in ESS in Program Year 6 (even if subject to *temporary* no-dual-participation conditions). Otherwise, we believe the Report, as supplemented by VGIC's comments, represents a nation-leading assessment and action plan for employing the significant capacity that V2G systems bring to the Connecticut grid.

Regarding the interconnection pathway, Tesla endorses the EDCs' Order No. 25 compliance filings. The Interconnection Working Group's process was collaborative and productive, and the EDCs were right to provide pathways for both AC- and DC-coupled systems, to incorporate review into the regular interconnection pathway, and to identify the EVSE as the unit of enrollment. We emphasize the importance of applying these requirements to systems enabled to discharge in parallel with the electric grid, and not to systems that are not configured to discharge in parallel with the grid, even if they possess equipment that would make them capable of doing so. We believe the updated interconnection requirements adequately reflect the understanding developed by the Working Group participants.

Regarding the PAs' updates to the Program Manual, the UL 1741 requirement on page 108 is not inclusive of the full range of certification pathways described in the Report or discussed in these comments in response to question (d). This is a prime example of the importance of capturing the accurate nuances presented in the Report.

Respectfully,
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CERTIFICATE OF SERVICE

I certify that a copy of this filing is being provided by electronic mail to all parties and participants of record according to PURA's service list for this docket as of today, August 28, 2026.

/s/ Dominic Gatti
Dominic Gatti
Energy Policy Advisor
Tesla Inc.