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November 10, 2026

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

Re: Docket No. 26-08-05, *Annual Energy Storage Solutions Program Review – Year 6* – Written Exceptions

Dear Mr. Gaudiosi:

The Connecticut Light and Power Company d/b/a Eversource Energy (the "Company") submits the attached written exceptions to the October 29, 2026 proposed final decision in this Docket.

The Company does not request oral argument, but reserves the right to participate if another participant timely requests oral argument.

Sincerely,
Jennifer E. Galiette
Jennifer E. Galiette
Senior Counsel
On behalf of CL&P d/b/a Eversource Energy

cc: Service List

STATE OF CONNECTICUT
PUBLIC UTILITIES REGULATORY AUTHORITY

ANNUAL ENERGY STORAGE SOLUTIONS PROGRAM REVIEW – YEAR 6	:	**DOCKET NO. 26-08-05**
		NOVEMBER 10, 2026

WRITTEN EXCEPTIONS OF THE CONNECTICUT LIGHT AND POWER COMPANY D/B/A EVERSOURCE ENERGY

I. INTRODUCTION

The Connecticut Light and Power Company d/b/a Eversource Energy ("CL&P" or the "Company") submits these written exceptions in response to the October 29, 2026 proposed final decision (the "Proposed Final Decision") of the Public Utilities Regulatory Authority ("PURA") in the above-captioned docket. These written exceptions ask PURA to make five important clarifying changes to the Proposed Final Decision regarding the energy storage solutions ("ESS") program (the "ESS Program" or the "Program").

II. NECESSARY CHANGES TO THE PROPOSED FINAL DECISION

A. The Proposed Final Decision Should Be Clarified to Reflect that the Electric Vehicles ("EVs") Compliance Filing Should Be Submitted by the Electric Distribution Companies ("EDCs") Only

Pages 14-15 of the Proposed Final Decision directs the Program Administrators (the electric distribution companies "EDCs" and The Connecticut Green Bank ("Green Bank")) to submit a compliance filing to PURA that includes, in part, the results of the EV Pilot programs no later than August 1, 2027. Eversource respectfully requests that PURA include the same language directing the EDCs to be solely responsible for this portion of the filing, as it did for the Interconnection portion. Specifically, Item #1 on Page 14 and subpart (a) of Order No. 23 should be revised to include language stating: "Although this will be a joint filing, the EDCs shall be

solely responsible for this portion of the filing because the EDCs administer the EV Pilot programs." Green Bank is not involved in either of the EV pilots. Therefore, the Proposed Final Decision should be clarified to indicate that the EV pilot programs portion of the compliance filing should be the responsibility of the EDCs only. This clarification should be reflected on Pages 14-15 of the Proposed Final Decision and in the corresponding Order No. 23.

B. The Proposed Final Decision Should Be Revised To Eliminate Formal Enrollment Incentive Clawbacks when the Enrollment Incentive is less than $1000 Consistent With the Record Evidence In This Docket

The Program Administrators estimated that implementing an enrollment incentive clawback would require approximately 5-10 hours of full-time employment hours totaling approximately $707-$1414 of administrative labor.[1] Additionally, no stakeholder expressed support for a residential enrollment incentive clawback, with all stakeholders citing that the administrative effort to enforce the clawback would likely be greater than the amount that could be recovered. For example, The Office of Consumer Counsil ("OCC") acknowledged that "a de minimis threshold may be appropriate where administrative costs would be disproportionate to the amount recoverable" and subsequently revised its position stating that it did not oppose limiting the clawback mechanism to commercial priority customers and residential TPO systems.[2]

In the Proposed Final Decision, PURA expresses its concern that the enrollment incentive is a material payment and it could be substantial, stating "the enrollment incentive may be $3,900 or more for grid-edge residential customers and may be substantially higher for commercial priority customers."[3] The Proposed Final Decision also highlights that without an enrollment incentive clawback mechanism in place, new third-party owners ("TPOs") could enroll large

[1] Q-CAE-9 at 3.

[2] Proposed Final Decision at 26, citing OCC Written Comments (filed July 9, 2026) at 4.

[3] Proposed Final Decision at 28.

swaths of customers, collect the enrollment incentive, and then unenroll those very same customers.[4]

Therefore, based on the concerns expressed by PURA and other stakeholders, and consistent with the record evidence in this docket, Eversource believes an enrollment incentive clawback should only be implemented when an enrollment incentive is greater than $1,000. Eversource submits that requiring ratepayers to bear between $707-$1414 in administrative and collection costs to recover an amount less than $1,000 is neither reasonable nor cost-effective. Establishing an enrollment incentive clawback provision for customers receiving more than $1,000 in enrollment incentives would provide a more efficient and fiscally responsible means of safeguarding ratepayer-funded program resources.

C. The FTM Storage Working Group Should be Led by All the PAs

Eversource respectfully requests that PURA reconsider the assignment of the FTM Storage Working Group to the Green Bank and instead assign the working group to all the Program Administrators, consistent with the approach established for the FTM Working Group pursuant to Order No. 9 of the Docket No. 22-08-05 Final Decision. The items to be addressed in the FTM Storage Tariff Report, appearing on Page 41 of the Proposed Final Decision, are ultimately issues concerning the potential establishment of a new EDC tariff. For this reason, Eversource believes it is critical that the EDCs, along with Green Bank, have the role of leading the FTM Storage Working Group and preparing the FTM Storage Tariff Report. Eversource also notes that, once the FTM Storage Working Group is established, it may be beneficial to engage a third-party consultant to help facilitate and manage the process, as was done during the prior FTM Storage Working Group process. The need for a consultant can be discussed during the initial FTM Storage

[4] Proposed Final Decision at 28-29.

Working Group meetings and proposed to PURA by the Program Administrators at that time if deemed advantageous by the Working Group members.

D. Eversource Supports PURA's Conclusions Regarding Hybrid Incentives

Eversource strongly supports PURA's conclusion in the Proposed Final Decision regarding hybrid incentives. Eversource fully supported PURA's conclusion in the December 17, 2025 Final Decision in Docket No. 25-08-05 to eliminate the Upfront Incentive associated with Passive Dispatch compliance effective April 1, 2026. However, because incentive reservations continued through March 31, 2026, more than 300 customers are expected to enter service under the legacy Passive Dispatch construct and remain subject to its compliance obligations. The Company's review of Passive Dispatch performance indicates while overall passive dispatch scores are improving, there remains some original equipment manufacturers ("OEMs") that continue to experience difficulty satisfying the applicable compliance requirements, creating an ongoing risk of customer clawbacks. For these reasons, Eversource strongly supports PURA's determination that customers seeking to expand legacy energy storage systems should transition to Construct 5.

E. The Due Date for the Order No. 16 Clawback Waivers Should Be Moved to December 1, 2027 if Final Active Dispatch Incentive Amounts are Necessary for PURA to Rule on the Motion

As discussed above, passive dispatch compliance remains an ongoing concern for legacy passive dispatch customers, with approximately 277 customers remaining out of compliance at the conclusion of the 2026 Passive Dispatch season. Order No. 16 in the Proposed Final Decision states: "Program Administrators shall first apply any clawback fees against a project's eligible performance incentive payments before pursuing direct collection from the customer." Based on this proposed directive, Eversource is uncertain whether PURA is proposing to require the final Active Dispatch incentive amounts to be included in the compliance Motion the PAs are directed

to make pursuant to Order No. 16 regarding clawback fee waivers, or whether the Green Bank's estimated amounts are sufficient for purposes of this Motion.

If PURA requires the Order No. 16 Motion to include final Active Dispatch incentive amounts, as calculated by the Distributed Energy Resource Management System ("DERMS") provider and subsequently validated by the EDCs, Eversource respectfully requests that the Order No. 16 compliance date be extended From November 1 to December 1. The Active Dispatch season concludes on September 30, and under its contract, EnergyHub is required to provide final Active Dispatch performance data by November 15. An extension to December 1 would therefore provide sufficient time for receipt and verification of the final performance data and would ensure that PURA has visibility into final, rather than estimated, performance incentive amounts.

Conversely, if PURA determines that estimated Active Dispatch incentive amounts are sufficient for purposes of ruling on the Motion, Eversource respectfully requests that the November 1 filing date remain unchanged. Maintaining the existing filing date would provide PURA additional time to adjudicate the Motion and would still allow customer Active Dispatch performance incentive payments, less any applicable clawback fees, to be issued in December.

F. Standing Order Nos. 3 and 4 Should Be Aligned

Following discussions with Customized Energy Solutions, the ESS Program's Evaluation, Measurement, and Verification ("EM&V") vendor, Eversource recommends aligning the due dates for Standing Orders Nos. 3 and 4 by applying the August 1, 2027, Annual Program Report deadline in Order No. 3 to the ESS Program's Three-year report in Order No. 4. Given the overlap between the reports, including the evaluation of Program performance and updated benefit-cost analyses, aligning the deadlines would reduce duplicative efforts and ensure alignment between both reports.

Alignment on these orders is also important given the potential for updated Avoided Energy Supply Cost ("AESC") assumptions and counterfactuals that could materially affect the Program's benefit-cost analysis ("BCA") results. Prior ESS evaluations demonstrated significant changes in prospective BCA results following updates to the AESC, while the selection of AESC counterfactuals can also materially affect reported cost-effectiveness.

III. CONCLUSION

For all of the reasons provided above, Eversource requests that PURA revise the Proposed Final Decision to incorporate its recommended changes and clarifications.

Respectfully submitted,

THE CONNECTICUT LIGHT AND POWER COMPANY D/B/A EVERSOURCE ENERGY

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Its Attorney

CERTIFICATE OF SERVICE

I hereby certify that I have this day served the foregoing document upon each person designated on the official service list in this proceeding.

Dated at Berlin, Connecticut this 10th day of November 2026.

Jennifer E. Galiette
Jennifer E. Galiette