Alliance for Climate Transition ("ACT") and Solar Energy Industries Association ("SEIA")
Docket No. 26-08-05
Response to Interrogatory CAE-43
Date of Submission: August 28, 2026
People Responsible: Tim Snyder (ACT) & Ruthie DeWit (SEIA)

Question:

CAE-43 To the extent practicable, quantify each benefit identified in CAE-43. For each quantified benefit, provide: (a) the estimated dollar value; (b) the methodology used; (c) all assumptions; and (d) any supporting studies or analyses.

Response:

The Joint Commenters construe this interrogatory as requesting quantification of the benefits identified in response to CAE-42 and respond on that basis.

The value of each benefit identified in response to CAE-42 depends on design elements that remain to be established, including the performance a resource must demonstrate, the hours against which performance is measured, and the settlement mechanism through which value is credited. The Joint Commenters describe below how each benefit could be quantified once those elements are fixed, what information quantification requires, and where that information is held.

Benefit 1: Reduced Regional Network Service cost allocation

(a) To be determined by applying the applicable Regional Network Service rate to the reduction in the electric distribution company's billed network load, calculated as described in subpart (b).

(b) ISO New England assesses Regional Network Service under Schedule 9 of its Open Access Transmission Tariff, applying the rate to each transmission customer's monthly peak network load under a twelve-month coincident peak methodology.[1] The peak-setting hour in each month is determined by ISO New England in the ordinary course of settlement, and metered discharge during that hour, verified through interval data, yields the reduction directly. The calculation requires no estimation once the hour is identified and the discharge is metered.

(c) The applicable Regional Network Service rate is established through Federal Energy Regulatory Commission proceedings and changes annually. The rate is $177.63 per

[1] *See* ISO New England Open Access Transmission Tariff, Schedule 9, https://www.iso-ne.com/static-assets/documents/100012/attachment-1-schedule-9.xlsx.

kilowatt-year for 2026 and $183.60 per kilowatt-year for 2027.[2] Local Network Service charges are assessed in addition. Value at the resource level depends on performance during peak-setting hours, which varies by resource and with whatever performance requirements are established.

(d) The applicable methodology is set out in Schedule 9 of the ISO New England Open Access Transmission Tariff. Current and forecast rate information is published by the Participating Transmission Owners and presented to the ISO New England Planning Advisory Committee.

Benefit 2: Avoided or deferred distribution capacity investment

(a) To be determined on a facility-specific basis, as the cost of the deferred upgrade discounted over the deferral period. The benefit varies with the facilities a given resource relieves and cannot be stated as a single figure applicable across resources.

(b) Connecticut has an existing analytical basis for this determination. In Docket No. 21-08-05, the Green Bank submitted a report on barriers, opportunities, and benefit-cost analysis for Connecticut front-of-the-meter storage on June 10, 2022, with an accompanying model, prepared in compliance with the Final Decision in Docket No. 17-12-03RE03. That analysis modeled six front-of-the-meter cases across transmission-connected, Eversource-connected, and United Illuminating-connected configurations, and found an economic gap remaining in each after accounting for wholesale market revenues. The Authority's non-wires alternatives framework provides the mechanism for identifying which facilities present deferrable investment.

(c) Facility-specific valuation would draw on the electric distribution companies' assessment of facility condition, forecast loading, and planned upgrade timing.

(d) Connecticut Green Bank, Report on Barriers, Opportunities, and Benefit Cost Analysis for Connecticut Front-of-the-Meter Storage, Docket No. 21-08-05, June 10, 2022, and accompanying model.

Additional benefits

Avoided wholesale costs, reduced losses, induced wholesale market pricing effects, and avoided emissions are each quantifiable in principle and have been quantified in other jurisdictions, but each requires production cost or system modeling rather than calculation from published rates, and that modeling has not been performed for Connecticut. The Clean Energy States Alliance and Applied Economics Clinic framework for energy storage benefit-cost analysis,[3] the 2020 and 2024 New York State

[2] ISO New England, Section II Open Access Transmission Tariff Rates, Schedule 9 Regional Network Service, https://www.iso-ne.com/markets-operations/settlements/rate-development.
[3] Clean Energy States Alliance and Applied Economics Clinic, *Energy Storage Benefit-Cost Analysis Framework for State Energy Programs*

Energy Research and Development Authority storage studies,[4] the Delaware value of battery energy storage study,[5] and the analysis submitted in Maryland Public Service Commission Case No. 9715 each address these categories.[6]

[4] New York State Energy Research and Development Authority, *New York State Energy Storage Study* (Report 20-34, 2020); New York State Energy Research and Development Authority, *Impact Evaluation of Energy Storage System Performance* (2024)

[5] Energize Delaware, *Value of Battery Energy Storage Systems* (2026)

[6] Customized Energy Solutions, Ltd., *Design and Development of a Grid Services Tariff and Incentive Framework for Distribution-Connected Storage*, Maryland Public Service Commission Case No. 9715, Item No. ML332734 (July 17, 2026), available through the Maryland Public Service Commission Document Management System, https://webpscxb.pscmaryland.com/DMS/maillogsearch.