Company
Docket No. 26-08-05
Response to Interrogatory CAE-13
Date of Submission: August 28th, 2026
Witness: Jennifer Runyon Eversource, Logan Taricani United Illuminating, Sergio Carrillo Connecticut Green Bank

Question:

CAE-13 Program Administrator Order No. 20 Compliance, July 29, 2026, Att. 1, p. 61. Explain the basis for recommending a minimum discharge capacity of 20 kW per charging port. Include any analysis performed evaluating alternative minimum discharge capacities and their expected impacts on ratepayer benefits and market participation.

Response:

The recommended minimum discharge capacity of 20 kW per port is informed by several technical and market development factors and is aligned with the Program Administrators' recommendation to advance commercial vehicle-to-grid ("V2G") enrollment opportunities in 2027. Notable items that inform this recommendation include:

- Creating a practical focus on enrolling direct current fast charging ("DCFC") stations versus charging stations that use alternating current (often referred to as "Level 2 chargers"), which typically have a maximum discharging capacity of 19.2 kW. By restricting to DCFC chargers, ESS would streamline potential fleet discharging use cases, resulting in a smoother V2G ESS integration.
    - Relatedly, the PAs want to recognize current technology adoption trends within the medium- and heavy-duty ("MHD") fleet charging sector, in which fleet operators are increasingly deploying DCFCs due to their superior integration with charge management system software ("CMS") platforms. The Green Bank has observed that electric school bus fleet operators frequently highlight inconsistent CMS integration and performance as a barrier to deploying Level 2 chargers.
- Promoting alignment with the overall Bidirectional EV Working Group recommendations focused on using the inverter in a charging station as the enrolled device. Allowing the enrollment of charging stations below 20 kW could result in the need to enroll individual bidirectional-capable EVs since Level 2 chargers do not have an inverter. This recommendation also helps support smoother Evaluation, Measurement, and Verification ("EM&V"), as discharging performance would be verified solely with charger telemetry data versus potentially a combination of charger and vehicle telemetry data.
- Promoting general alignment with the summer peak shaving focus of the ESS Program by encouraging the integration of higher-powered bidirectional charging systems than a lower minimum per port average may lead to, thereby promoting overall grid resilience.

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Taken together, these factors illustrate how the use of a 20 kW per port discharging minimum would support the successful integration of commercial V2G projects into the ESS Program in 2027. Revisiting this minimum standard will likely be needed in the future if the Authority and Program Administrators consider supporting residential V2G opportunities.