ANNUAL REVIEW OF THE ELECTRIC VEHICLE CHARGING PROGRAM - YEAR 6	:	DOCKET NO. 26-08-05
	:	
	:	AUGUST 28, 2026

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

VIA ELECTRONIC FILING

ev.energy Comments on Notice of Request for Written Comments: Docket No. 26-08-05, Annual Energy Storage Solutions Program Review —Year 6

Dear Mr. Gaudiosi,

ev.energy respectfully submits to the Public Utilities Regulatory Authority ("PURA" or "Authority") comments in response to the August 12, 2026 Notice of Request for Written Comments ("Notice") in Docket No. 26-08-05, Annual Energy Storage Solutions Program Review – Year 6. We focus our comments on Section 2 of the Notice concerning bidirectional electric vehicle ("EV") participation in the Energy Storage Solutions ("ESS") Program.

I. Introduction

ev.energy submits these comments as an independent distributed energy resource ("DER") aggregator with 8+ years of experience orchestrating 300,000+ DERs across utility, Community Choice Aggregation, and retail energy provider partnerships in the U.S. and internationally, including in Connecticut where ev.energy currently supports Avangrid's and Eversource's EV Managed Charging Programs.

We participated in the Bidirectional EV Working Group and appreciated the opportunity to weigh in through that process. We build on that participation by replying to the Authority's questions with a focus on residential consumers. Our primary recommendations for consideration are:

- Accelerate the incorporation of residential customers' bidirectional EVs, and the associated bidirectional-capable electric vehicle supply equipment (EVSE), into the ESS Program to enable the delivery of grid benefits and accelerate program learnings.
- Create a timely framework for enabling bidirectional EVs to participate in the ESS Program and Connecticut's Managed Charging Programs simultaneously. We find that the benefits of the Managed Charging Program would complement bidirectional EV participation in the ESS Program and reduce grid stress rather than lead to dual compensation.

- Open a vehicle-to-grid (V2G) proceeding to provide a dedicated venue where stakeholders can collaboratively work to maximize the benefit of bidirectional EVs and EVSE.

Thank you for the opportunity to provide our perspective on how bidirectional EVs can improve grid affordability and reliability for all ratepayers in Connecticut.

Respectfully submitted,

/s/ Kerry Skemp
Kerry Skemp
Public Affairs Lead
ev.energy
Tel: 831-217-3766
E-mail: kerry.skemp@ev.energy

II. Comments

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.

Given the working group's proposed program design, including the single-program participation constraint, the overall battery storage capacity of bidirectional-enabled EVs, and the ability of bidirectional-capable EVSEs to discharge this capacity, yes, the ESS Program has the potential to provide greater overall benefits to ratepayers than Connecticut's existing Managed Charging Program. However, we believe it is inappropriate to use this framing to compare the value and success of the two programs, as they have different sets of programmatic goals.

Connecticut's EV Managed Charging Programs are a component of Connecticut's statewide EV initiatives, which have five (5) programmatic goals as adopted by the Authority in Decisions issued on July 14, 2021 in Docket number 17–12-03RE03 and on December 15, 2021 in Docket number 21-08-06.[1] The EV Managed Charging Programs help achieve these goals by enabling ratepayers to shift their *charging* off-peak through participation in demand

[1] The five programmatic goals of the statewide electric vehicle program include: 1) enabling Connecticut's commitment to the ten-state Memorandum of Understanding (MOU), 2) facilitating the seamless integration of new and emerging ZEV-related technologies to realize the potential electric system benefits of ZEVs, along with the economic, health, and environmental benefits they provide; 3) deploying and integrate ZEVs into Connecticut's electric grid (i.e., the distribution system infrastructure) as a key component of meeting the objectives of the Authority's Framework for an Equitable Modern Grid; 4) achieving an equitable transition to wide-scale EV deployment across all communities in Connecticut; 5) achieving the National Electric Vehicle Infrastructure (NEVI) Program's goal of deploying 40% of all EVSE projects in underserved communities in accordance with the federal Justice40 initiative. See: https://portal.ct.gov/-/media/pura/electric/final-decision-docket-no-17-12-03re04.pdf?rev=375f6dc11a37456585bfa0acb2a4ae28&hash=1AAE4D3BE87343F96CEAD8F9643D8D5E and https://www.dpuc.state.ct.us/dockhistpost2000.nsf/8e6fc37a54110e3e852576190052b64d/fd42b41447257d7085258db700662204/$FILE/210806-121521.pdf

response events, and two different managed charging solutions.[2] The ESS Program goals as adopted by the Authority on July 28, 2021, in Docket number 17-12-03RE03 have seven stated goals which support the state's goal of deploying 1,000 megawatts (MWs) of capacity by 2030.[3] The ESS Program helps achieve these goals by incentivizing the deployment of eligible energy storage technologies through the combination of an upfront installation incentive and a performance based *discharge, or dispatch,* incentive during peak hours in the summer and winter.[4]

Bidirectional EVs, when paired with bidirectional compatible EVSEs, are a unique technology that can contribute towards the achievement of both sets of state goals (i.e., accelerating the adoption of EVs and energy storage) and program goals (i.e., charging EVs during off-peak periods and discharging capacity during periods of during peak hours) when enabled to do so. According to the June 2024 Evaluation, Measurement, & Verification ("EM&V") Report, residential EVs enrolled in the Managed Charging Program's Baseline or Advanced tier were associated with a statistically significant reduction of 18.8 percentage points in the amount of peak charging compared to those not enrolled in a time-of-use or the Managed Charging Program.[5] And residential bidirectional EVs, when paired with bidirectional compatible EVSE's, have the potential to *discharge* between ~9 and 12 kWs during peak periods via the ESS Program.[6] Meaning that the best way for Connecticut to achieve its ambitious electric vehicle and energy storage goals is to enable and encourage

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[2] The Managed Charging Programs provide two participation pathways beyond the demand response events. The first pathway called the "baseline tier" provides financial incentives for ensuring 80% of charging occurs off-peak. The second pathway called the "advanced tier" provides financial incentives for allowing the utility to manage charging during a defined off-peak window. See EDC program pages for more details: https://www.uinet.com/smartenergy/electric-vehicles/programs-for-your-home/single-family-residence and https://www.eversource.com/residential/save-money-energy/clean-energy-options/eleperiodsctric-vehicles/ev-charger-managed-charging

[3] The seven programmatic goals of the statewide energy storage program include: 1) Providing positive net present value to all ratepayers, 2) providing multiple types of benefits to the electric grid, 3) fostering the development of the state's energy storage industry, 4) increasing resilience for historically disadvantaged communities and customers, customers who consistently impacted by major storms, and critical facilities, 5) lowering the barriers to entry, financial or otherwise, for electric storage deployment in Connecticut. 6) maximizing the long-term environmental benefits of electric storage by reducing emissions associated with fossil-based peaking generation, and 7) maximizing the benefits to ratepayers derived from the wholesale capacity market. See https://portal.ct.gov/-/media/pura/electric/final-decision-docket-no-17-12-03re03.pdf?rev=45b99cd447fc49459062d9992e70a62d&hash=ACACD8B933512F3B619531022DA7DBAA

[4] On December 17, 2025 in Docket No. 25-080-5 the Authority adopted a Decision that phased out the passive incentive option from the ESS Program and instead required all new participants and energy storage technologies participants to participate in the performance based incentive effective April 1, 2026. See: https://www.dpuc.state.ct.us/dockcurr.nsf/8e6fc37a54110e3e852576190052b64d/b1de90d5e52b43d185258d630056a8bf/$FILE/250805-121725.pdf

[5] Connecticut Statewide Electric Vehicle Charging Program Program Cycle 1 EM&V Report. See page 181 here: https://www.dpuc.state.ct.us/dockcurr.nsf/8e6fc37a54110e3e852576190052b64d/3bdbc883f8dc04ab85258b3f00498da7/$FILE/ATT%205%20CT_EV_Infrastructure_Program_Cycle_I_EMV_Report.pdf

[6] See: https://energy-solutions.co/articles/sub/evs-bidirectional-charging-capability-2026

ratepayers with the right combination of eligible technologies to participate in both the ESS Program and the Managed Charging Program, which may already be occurring.

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.

ev.energy recommends that compatible residential bidirectional EVs, when paired with bidirectional compatible EVSEs, be eligible for the ESS Program beginning in Program Year 6, and that participation in the Managed Charging Program be available beginning in Program Year 7.

As noted above, the bidirectional EVs can help Connecticut achieve its energy storage goals by enabling the at least 12+ passenger vehicle models (as referenced in the report)[7] and the roughly 3,000 bidirectional EVs currently registered in Connecticut to participate in the ESS Program.[8] The technology is capable of participating in energy *discharge,* and there are already a number of active interconnection requests to do so (through the Innovative Energy Solutions program)[9].

Deferring residential eligibility another year or more would remove a potentially beneficial source of capacity from Connecticut's grid, exclude some of the fastest-growing vehicle models in terms of sales from participating, and delay much needed learnings which can only be generated by customers with bidirectional vehicles seeking to discharge their capacity. The Innovative Energy Solutions V2X Residential Pilot program has already submitted filings on their progress to date, including the latest filing referenced above, that can inform inclusion of residential EVs in the ESS Program.

Additionally, we recommend that starting in program year 7, any bidirectional EVs participating in the ESS Program also be eligible to participate in their respective electric distribution companies' (EDCs') Managed Charging Program Advanced Tier to realize the "full stack" of grid benefits that bidirectional vehicles are capable of. Our research with The Brattle Group finds that active managed charging can deliver up to $575 per EV per year in grid value, while that value extends to $1,320 per vehicle annually when including

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[7] "Integrating Bidirectional Electric Vehicles into the Energy Storage Solutions Program." Customized Energy Solutions, Ltd. July 29, 2026. https://www.dpuc.state.ct.us/DOCKCURR.NSF/8e6fc37a54110e3e852576190052b64d/0529ac4be0eb8df385258e430068c9df/$FILE/Attachment%201%20Integrating%20Bidirectional%20Electric%20Vehicles%20into%20the%20Energy%20Storage%20Solutions%20Program.pdf

[8] CT Data, Electric Vehicle Registration Data https://data.ct.gov/Transportation/Electric-Vehicle-Registration-Data/y7ky-5wcz/about_data.

[9] QUARTERLY PROGRESS REPORT, Q2 2026 for V2X Residential Pilot Innovative Energy Solutions. Bidirectional Energy. July 8, 2026.See: https://www.dpuc.state.ct.us/dockcurr.nsf/8e6fc37a54110e3e852576190052b64d/1a9617bc66d2cc9785258e2e00641698?OpenDocument

bidirectional export.[10] This means Connecticut could nearly double its expected grid value by allowing consumers with eligible technology to participate in both programs.

As the working group report points out, "a vehicle owner who expects their vehicle to be called to discharge during an afternoon ESS event has a strong incentive to ensure the vehicle is charged before that window — and to resume charging immediately after the event concludes."[7] The report also notes, "ensuring that customers enrolled in ESS are also enrolled in the Managed Charging [Program] Advanced Tier would allow the EDCs to reduce the adverse timer peak impacts of customers seeking to charge following an ESS event." We agree that enabling bidirectional EVs enrolled in the ESS Program to also participate in Managed Charging Program Advanced Tier is a way to maximize the overall benefits of the ESS Program and prevent simultaneous recharging immediately after a discharge event. To assist in the achievement of the goal of dual participation, we provide the following recommendations:

- We recommend that ESS Program Administrators and Managed Charging Program Administrators generate a list of dual program participants and survey this cohort to understand their knowledge of and interest in participating in the residential V2G offering. This survey could be a helpful first step in accelerating the inclusion of residential bidirectional charging into the ESS Program and understanding the importance of dual participation overall.
- We recommend that ESS Program Administrators require all bidirectional EVs enrolled in the ESS Program to utilize software charging solutions that ensure the vehicles do not start charging again during the peak period. This will minimize post-discharge charging during peak periods, except as needed for user override.
- We recommend that the ESS Program Administrators explore how a required off-peak software charging solution rule may remove concerns about dual participation in the Managed Charging Program and enable enrollment starting in program year 7.

We believe that enabling residential eligibility in program year 6 and dual participation in program year 7 will support the ongoing work of the V2X Residential Pilot Innovative Energy Solutions, provide the EDCs with the first set of projects to work through the process, and send an incentive signal to the market that will attract additional interest for consumers in making the investments necessary to participate in the ESS Program.

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.

As noted above, we think residential enrollment is feasible at this time and would not be facilitated by waiting. We suggest the working group and program administrators review

[10] "Turning EV grid risk into a $30 billion opportunity." ev.energy and The Brattle Group. September 2025. See: https://platform.ev.energy/resources/value-of-managed-charging#cost-avoidance-stack

progress in the current IES pilot at the end of 2026 and make recommendations regarding any steps necessary to include residential bidirectional EVs in 2027, and establish a clear timeline with milestones and actions required to enable residential participation.

We don't believe full clarification on metering and other implications of participating in ESS and the applicable distributed generation policy are necessary before residential enrollment commences. Certain customers can be deemed ineligible or require certain metering configurations before related final policy decisions are made.

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.

We find the technical requirements are reasonable and suggest that there be a pathway for updating technical requirements as standards evolve without filing new programs. For example, new bidirectional requirements for ISO 15118-20 were released in July 2026 that can be incorporated into program considerations.[11]

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.

We believe that the most cost-effective participation model uses existing frameworks and programs, such as the current Managed Charging Programs and upfront EVSE incentives. We would also support the development of a V2G-specific docket to enable a more holistic review of these issues and potential solutions.

If the Authority determines that a V2G-specific docket is appropriate, we request that additional technology attributes of bidirectional vehicles, such as vehicle-to-home (V2H), be included in scope. As described in the Working Group report, bidirectional EVs capable of V2H can support customer resilience by providing backup power. Additionally, recent research and modeling by the California Energy Commission found that V2H when providing curtailment like services can reduce utility bills and greenhouse gas emissions.[12] V2H functionality is not currently incentivized through the existing Managed Charging Program and would also not be compensated through the ESS Program. Both programs are thus

[11] ISO 15118-20 Amendment 1 Published: AC DER Service, MCS Service, and Improved Security Concept. CharIN. July 17, 2026. https://www.charin.global/news/iso-15118-20-amendment-1-published/

[12] The California Energy Commission analysis found that the state's 1.5 GW of light-duty vehicle capacity could hypothetically reduce peak residential demand by 5GW in 2030 and save utility customers between $262 and $321 dollars when using V2H to "remove" the home from the grid for a period of time in a whole home curtailment like fashion. For more details see Docket NUmber 22-EVI -06 and the document titled A roadmap to unlocking the benefits of bidirectional charging at: h,curtailment-like,ttps://efiling.energy.ca.gov/Lists/DocketLog.aspx?docketnumber=22-EVI-06

currently missing out on this potential value.

Finally, if it is determined that residential bidirectional vehicles won't be eligible to participate in the ESS Program and Managed Charging Program as proposed, we request the Authority adopt official program year goals for each topic and request the program administrators file quarterly filings to the existing ESS Program docket or the newly created V2G docket on the status of removing the barriers to achieving these goals. Adopting timeline goals and providing transparency into the status of achieving them provides the market and V2G stakeholders with the certainty required to invest resources into ensuring successful implementation.

ev.energy appreciates the opportunity to comment on these issues and looks forward to accelerating the contribution of bidirectional vehicles to providing grid benefits for all.

Respectfully submitted,

/s/ Kerry Skemp
Kerry Skemp
Public Affairs Lead
ev.energy
Tel: 831-217-3766
E-mail: kerry.skemp@ev.energy