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CONNECTICUT GREEN BANK

July 9th, 2026

Jeff Gaudiosi, Esquire
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

Response to Request for Written Comments 1

Dear Mr. Gaudiosi,

The Connecticut Green Bank ("Green Bank") respectfully submits Written Comments below into the above referenced docket ("Docket") in response to that certain Notice of Request for Written Comments issued by the Public Utilities Regulatory Authority ("PURA") on June 9th, 2026 (the "Notice"). The section below is organized based on the corresponding sections in the Notice.

The Green Bank greatly appreciates the opportunity to provide Written Comments in the above-mentioned docket and would like to address the following items in its response: **1. Enrollment Incentive Clawback and 2. Other**

CONNECTICUT GREEN BANK RESPONSE:

1) Enrollment Incentive Clawback

The Green Bank does not support applying enrollment incentive clawbacks to residential homeowner-owned systems because the administrative costs and adverse impacts on customer participation outweigh any potential ratepayer benefit.. Because Construct 5 enrollment incentives are substantially lower than legacy Passive Upfront incentives, any ratepayer benefit from repayment is unlikely to justify the administrative costs, complexity, and customer confusion such a mechanism would create. A clawback for these systems would also conflict with Energy Storage Solutions Program Objectives 2, 3, and 5.

The Construct 5 incentive is intended to reduce barriers to storage deployment and encourage participation, consistent with Program Objective 5. A clawback would introduce financial uncertainty, particularly for low-income customers and customers in underserved communities who may unenroll for reasons beyond their control such as relocation, equipment failure, or the need to preserve battery capacity for backup during outages. This risk could discourage participation, negatively portray the Program, and weaken the Program's resilience benefits for the communities most in need.

A clawback would also increase administrative burden and implementation costs. For example, a 15 kWh battery in a non-grid-edge territory would receive only a $450 enrollment incentive, making collection of any prorated repayment not cost effective, especially where a customer is unable or unwilling to pay. The enrollment incentive supports market stability by providing predictable upfront compensation, consistent with Program Objective 3. Repayment uncertainty could reduce participation and undermine Program

Objective 2 benefits, including peak demand reduction, emissions reductions, and avoided or deferred distribution upgrades. Moreover, storage systems continue to provide grid and resilience value through backup and solar self-consumption even if a customer is no longer enrolled. Because any clawback would apply only to customers enrolled after the Year 6 Decision, enforcement would add further administrative complexity and likely cost more than it recovers.

If PURA adopts a clawback for Construct 5 enrollment incentives, it should not apply universally. Homeowner-owned residential systems raise distinct equity and administrative concerns compared with commercial-scale or residential third-party-owned (TPO) projects. A universal clawback could disproportionately affect individual residential customers, including low- and moderate-income households, environmental justice communities, and Grid Edge customers. If the Authority determines that a clawback is necessary, the Green Bank recommends limiting it, as appropriate, to commercial and residential TPO projects.

Finally, PURA's Proposed Final Decision recognized that, although active dispatch participation was not required to receive the enrollment incentive, strong ongoing performance payments were expected to encourage high dispatch participation. The Green Bank agrees that customers already have a strong incentive to remain enrolled.

2) Other

The Green Bank is running into a challenge processing change orders for legacy systems, particularly where a system size increases in kW or kWh capacity. PURA has previously advised the Program Administrators not to exceed the allotted capacity in a closed incentive tranche. While relatively uncommon, change orders will occur for some legacy projects due to circumstances outside the customer's or developer's control, including equipment availability or interconnection study results, or the availability of newer or more suitable equipment. A potential solution may be that the Program Administrators recommend retaining limited discretion to accommodate such project-specific changes where appropriate, provided that any modifications remain consistent with Program requirements and do not substantially increase incentive upfront costs for a closed tranche.

CONCLUSION

The Green Bank appreciates the opportunity to submit these Written Comments and looks forward to continuing to work with PURA and the Program Administrators to ensure the continued success and effective administration of the Energy Storage Solutions Program.

Respectfully submitted,



By:
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