VGIC Written Exceptions to Draft Decision in 26-08-05

November 10, 2026

VIA ELECTRONIC FILING

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

RE: Vehicle-Grid Integration Council Written Exceptions to the Draft Decision, Docket No. 26-08-05, Annual Energy Storage Solutions Program Review – Year 6

Dear Mr. Gaudiosi:

The Vehicle-Grid Integration Council ("VGIC") respectfully submits these written exceptions to the Authority's October 29, 2026 Draft Decision. VGIC supports the Draft Decision's approval of commercial bidirectional EV charging system participation beginning January 1, 2027 and the updated interconnection guidelines for bidirectional charging systems. VGIC also offers recommendations to support a clear path to residential eligibility, including a request to correct an error in the Draft Decision and added direction ahead of the August 1, 2027 compliance filing.

Introduction

VGIC commends the Authority, the Program Administrators ("PAs"), the support consultant Customized Energy Solutions ("CES"), and the many stakeholders who contributed to the Bidirectional EV Working Group ("Working Group") for expanding the Energy Storage Solutions ("ESS") Program to include bidirectional EV charging systems. The Draft Decision appropriately approves a performance-only incentive for commercial bidirectional EV charging systems, waives the islanding requirement, counts EVSE export ratings toward the 580 MW goal, and gives the PAs authority to waive certain technical requirements.[1] Together, these changes establish a practical framework for integrating bidirectional EV charging systems into the ESS Program beginning in 2027.

VGIC also commends the electric distribution companies (“EDCs”) for proposing clear interconnection rules for bidirectional EV charging systems, and the Authority for adopting them. The Draft Decision approves the revised Interconnection Guidelines and directs their use for all applicable requests by January 4, 2027.[2] Clear interconnection rules are among the most important enablers of this market.

Residential Bidirectional EV Charging Systems Should Be Included in the ESS Program

VGIC maintains the position in its August 28, 2026 comments: residential bidirectional EV charging customers should be included in the ESS Program in 2027. VGIC will not repeat that detailed filing here, but respectfully notes that the Draft Decision itself supports much of its

[1] Draft Decision at 17-21.
[2] Draft Decision at 22-23.

reasoning. The Draft Decision recognizes that the performance-based structure "provides important ratepayer protection because participating customers are compensated only based on actual performance."[3] It describes the limit to commercial customers as "a matter of sequencing, not a determination that residential bidirectional EVs are unsuitable for the ESS Program."[4]

VGIC understands that limiting 2027 bidirectional EV charging system eligibility to commercial customers is a judgment call within the Authority's discretion. VGIC believes that this judgment appears insufficiently supported by the record. For example, as detailed in the section below, the scenario of EV customers being "stranded" or left without charge is raised in the Draft Decision, but neither the Working Group Report nor stakeholder comments provide evidence that this has occurred, or would occur, with modern bidirectional EV charging systems, which allow consumers to establish a minimum battery state of charge or reserve driving range, expressed in miles, to meet their mobility needs. The Working Group Report raises the possibility only hypothetically, and primarily in explaining why co-participation in the ESS and Managed Charging programs should not yet be allowed. Another example where the Draft Decision is inconsistent with important elements of the record is in summarizing, but not analyzing or discussing, the evidence VGIC, Tesla, and EV.Energy submitted regarding vehicle availability and market readiness, which provide critical support for residential inclusion at this time.

Notwithstanding these shortcomings, VGIC appreciates the signal that the Authority views this determination as a matter of sequencing. VGIC plans to work closely with the PAs and others to increase confidence and understanding and looks forward to advancing eligibility for residential bidirectional EV charging systems. **VGIC and its members are available to provide the full extent of their expertise and relationships to respond to requests for information, data, or insights that could specifically support this expansion in January 2028 or earlier.**

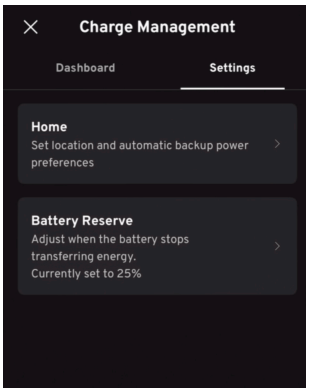
The Draft Decision Mischaracterizes the Record Regarding Customers Being Left Without Charge and Should Be Corrected

One of the Draft Decision's reasons for withholding residential eligibility at this time is the concern that "a residential customer could be unable to use an EV when needed for transportation because the vehicle participated in an active dispatch event that discharged the battery to a state of charge insufficient to meet the customer's transportation needs."[5] This concern does not reflect how bidirectional EV charging systems operate and is not supported by the record of this proceeding or available information on pilots in other jurisdictions. VGIC respectfully requests that the Authority consider correcting the Draft Decision to reflect current technology and the record of this proceeding.

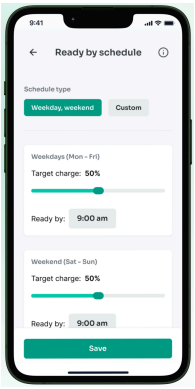
To VGIC's knowledge, every bidirectional EV charging product on the market, whether residential or commercial, AC- or DC-coupled, and whether marketed by an automaker, an EVSE provider, a site developer, or an aggregator, relies on the customer or fleet operator to set a reserve limit. This could be a minimum state of charge (%), a minimum range (miles), and/or a

[3] Draft Decision at 13.
[4] Draft Decision at 14.
[5] Draft Decision at 13.

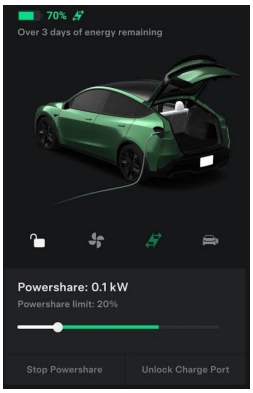
"ready by" target state-of-charge *and* time-of-day. VGIC offers several examples of residential EV bidirectional charging system customer mobile apps, in-vehicle displays, and other views demonstrating the capability to change the reserve setting and/or "ready by" schedule:



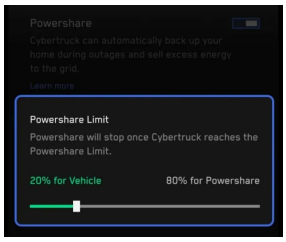
GM Energy



Bidirectional Energy



Tesla Mobile App



Tesla Mobile App



Ford F-150 Lightning In-Vehicle Display (this example displays the home backup power feature)



Kia EV9 In-Vehicle Display (this example displays the vehicle-to-load feature)

A vehicle therefore would not discharge "to a state of charge insufficient to meet the customer's transportation needs," whether as a result of ESS Program participation or for any other purpose, unless the customer or fleet operator has set the reserve or target below their own needs. Customers can also override or opt out of an individual event when an unexpected need arises. Because ESS compensation is based on average performance across events, customers who opt out of individual events would see their average performance reduced, resulting in lower incentive payments.[6] Both discharging limits and event opt-out features are standard for modern vehicle-grid integration offerings that preserve consumer choice and control. Importantly, Connecticut's ESS Program Manual already recognizes "owner-configured minimum SOC limits" and backup reserves for stationary battery systems, demonstrating that customer-established energy reserves are an established feature of energy storage systems participating in the Program.[7] In addition, Connecticut's own Managed Charging Advanced Tier, for example, accommodates participant opt-outs.[8]

Notably, the record of this proceeding already discusses customer control over dispatch and offered capacity. Working Group participants stressed the importance of "ensuring customers

[6] Working Group Report at 15, 20.
[7] Energy Storage Solutions Program Manual (May 19, 2026) at 44, Table 7.
[8] Working Group Report at 23.

maintained ultimate control over how their EV was dispatched, ensuring a state of charge that met the customer's needs."[9] Participants also acknowledged that "customers retain discretion over how much battery capacity they make available."[10]

The Working Group Report also shows where the Draft Decision's concern about customers lacking sufficient charge originated. The Report raised the possibility of "stories of customers not having a sufficient level of charge in their EV when they need to travel" in explaining why the PAs did not recommend co-participation initially in the ESS and Managed Charging programs,[11] and it listed "vehicles that cannot charge by departure time" alongside "conflicting signals between Managed Charging and ESS" as customer-experience risks.[12] Notably, the Draft Decision already prohibits dual participation by bidirectional EV charging systems in the ESS and managed charging programs,[13] which sufficiently addresses that coordination risk. Further, the discussion of residential usage patterns that the Draft Decision cites[14] concerns whether vehicles will be "available and adequately charged for any given dispatch event," which is a question of program performance. On that question, the Report concludes that this variability "does not disqualify residential vehicles from the program," because "vehicles that miss events simply do not earn for those events, and the Program does not incur a financial loss," while noting that residential performance rates will likely be lower and more variable than those of stationary storage.[15]

With this in mind, VGIC respectfully requests that the Authority revise the Draft Decision to (a) accurately reflect that discharge is bounded by the customer's *reserve setting* and/or *ready by schedule*, consistent with the record and as illustrated in the above images, and (b) strike or revise the following statement: "a residential customer could be unable to use an EV when needed for transportation because the vehicle participated in an active dispatch event that discharged the battery to a state of charge insufficient to meet the customer's transportation needs." VGIC additionally urges the Authority to take into account the reserve-setting capability of bidirectional EV charging systems, whether ESS-ineligible residential systems or ESS-eligible non-residential systems, when issuing any future guidance to the PAs on updating the ESS Program Manual.

VGIC Recommends the Established Bidirectional EV Working Group Be Leveraged to Support the August 2027 Recommendations, and that Additional Detail be Required in Those Recommendations

VGIC strongly encourages the Authority to reconstitute the Bidirectional EV Working Group, established in the Year 5 Decision, to support the August 2027 compliance filing and recommendations. The Working Group met six times from March to June 2026, was facilitated

[9] Working Group Report at 37; see also Draft Decision at 8.
[10] Working Group Report at 32.
[11] Working Group Report at 38.
[12] Working Group Report at 61.
[13] Draft Decision at 15-17.
[14] Draft Decision at 13 (citing Working Group Report at 15-16, 61).
[15] Working Group Report at 15.

by the consultancy Customized Energy Solutions (CES), and included the PAs, pilot implementers from across the country, OEMs, aggregators, and EVSE providers. It is valuable and somewhat rare to have already assembled the right expertise for this important topic, and that should be leveraged moving forward, especially as the PAs look to file their recommendations in August 2027. Additionally, the August 2027 filing, *if* it does not recommend expanded eligibility, should include a more detailed accounting of the identified barriers so that the Authority's assessment is firmly rooted in a clear understanding of each barrier and its corresponding set of solutions. As such, VGIC recommends that the Authority:

- Amend Ordering Paragraph 23 to include a new subsection, "**Defined Barriers,**" that reads:

  > "If the PAs do not recommend residential bidirectional EV charging system participation, they shall provide a detailed explanation of any outstanding challenges for residential bidirectional EV charging system participation and a concrete catalog of the currently insurmountable barriers preventing the inclusion of residential systems."

- Direct the PAs to reconvene the Working Group for at least four meetings beginning no later than January 31, 2027 and concluding before August 1, 2027, with a defined meeting schedule and agenda explicitly tied to items (a) through (g) of Ordering Paragraph 23, as well as the new "Defined Barriers" subsection detailed in VGIC's above recommendation;
- Direct the PAs to circulate a draft of the filing to Working Group participants before August 1, 2027, and to summarize participant comments in the filing;
- Direct the EDCs to consult the Interconnection Working Group on item (c), while the EDCs remain solely responsible for that portion of the filing; and
- Encourage the PAs to provide periodic progress updates to the Authority.

Using the prior Working Group structure helps avoid losing critical momentum in the nine months between now and August 2027. It is likely the most efficient path to incorporate pilot results and any market context changes as they arrive, helping the PAs file recommendations that reflect the full, present landscape.

Conclusion

VGIC thanks the Authority for the opportunity to comment and for its work to bring bidirectional EV charging systems into the ESS Program. VGIC respectfully requests that the Authority:

1. Maintain its proposed approval of commercial bidirectional EV participation beginning January 1, 2027, and the revised Interconnection Guidelines;
2. Continue to treat residential eligibility as a priority and, consistent with VGIC's prior comments, include residential customers at the earliest opportunity;
3. Correct the Draft Decision's assertions regarding customers being left with insufficient state-of-charge; and

4. Revise Ordering Paragraph 23 so that:
    a. The August 1, 2027 compliance filing is supported by the established Working Group of experts, who are well equipped to answer PA questions
    b. The August 1, 2027 compliance filing, if it does not recommend eligibility expansion, includes a detailed, clearly defined lists of barriers.

Respectfully submitted,

Zach Woogen

Executive Director

Vehicle-Grid Integration Council