Connecticut Green Bank
Docket No. 26-08-05
Response to Interrogatory CAE-1
Date of Submission: July 9th, 2026
Witness: Connecticut Green Bank - Sergio Carrillo

Question:

CAE-1 Decision, Dec. 17, 2025, Annual Energy Storage Solutions Program Review – Year 5, (Year 5 Decision), pp. 20-25.

a. Comment on whether the adoption of Construct 5 has adversely affected Energy Storage Solutions (ESS) Program enrollment or resulted in any unforeseen implementation challenges.

b. If the response to part (a) is yes, provide recommended solutions to address the identified issue(s). Any such recommendations must consider cost impacts to non-participating ratepayers.

Response:

The Green Bank has not observed evidence that the adoption of Construct 5 has adversely affected overall ESS Program enrollment at this time. However, implementation of Construct 5 has presented certain operational considerations in some cases that may need continued monitoring and refinement.

Program Administrator Discretion

Construct 5 has resulted in increased conversational interest in the Program from third-party system owners (TPOs) and Aggregators. While the Program Administrators view this as a positive development, some applicants, particularly TPOs and Aggregators with limited financial history and operational experience, have brought risk and implementation challenges. TPOs and Aggregators do not always clearly fit the roles currently contemplated in the Program Manual. To address this, Program Administrators will request the ability to review TPO and Aggregator applications on a case-by-case basis, allowing discretion in determining whether the applicant company will serve the Program objectives. Program Administrators will consider eligibility, ownership structure, enrollment requirements, operational responsibilities, and data reporting obligations to ensure that Program benefits are appropriately directed.

As the Program Administrators should only file Program Recommendations and Program Manual changes annually through Order 3 or through a Motion, it leaves the Program Administrators in a situation where they are unable to handle issues as they arise or make decisions that have not been covered in the Program Manual which allows for issues to be tabled or carry on without the ability to stop them. The Program Administrators need flexibility to be made inherently clear in the next Program Manual

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submission so issues can be addressed at the Program Administrator's discretion as they impact the day-to-day implementation.

Automatic Enrollment

In addition to the increased interest from potential stakeholders, a new concept of automatic enrollment to ESS has emerged. Under automatic enrollment, an entity (such as a TPO or Aggregator) seeks to enroll customers based on prior authorization through a lease or financing agreement rather than the traditional Program documentation (i.e.: ESS Terms and Conditions). While automatic enrollment structures exist in other jurisdictions including Puerto Rico and California, those models may have been adopted under distinct legal, regulatory, or policy circumstances and do not necessarily mean that a comparable approach is suitable for ESS where systems can be customer owned. Automatic enrollment raises concerns with customer information, consent, benefit allocation, and consumer protection particularly where Program payments may accrue to the automatic enrolling entity and only a portion, if any, may be passed through to the customer. Any automatic enrollment pathway would require further review, including evaluation of applicable Program requirements, customer authorization standards, interconnection data availability, and consumer protection regulations.

EDC Data Availability

The Green Bank also notes that certain data access limitations continue to affect Program implementation and reporting. The Green Bank appreciates the data sharing efforts of the Program Administrators, however, the electric distribution companies' (EDCs) PowerClerk data is not always readily available for all projects that have a battery installed or the data is not always complete for all fields, and in some cases this data cannot be used to fully address data gaps in the current self-enrollment process or in some instances, the enrollment process more broadly. For example, cost information and battery energy storage system ownership information may be unavailable, incomplete, or outdated, which affect Program reporting. The Green Bank recommends continued coordination with the EDCs to improve the availability, accuracy, and usability of relevant data, including refinement of Grid Edge mapping tools and correction of any identified technical issues. Any recommended data or system improvements should be evaluated for cost-effectiveness and implemented in a manner that supports Program administration while minimizing unnecessary cost impacts to non-participating ratepayers as it may be more cost effective for the applicant to provide this information rather than the Program Administrators.