July 9, 2026

Via Electronic Filing and Service

Jeffrey R. Gaudiosi
Public Utilities Regulatory Authority
10 Franklin Square
New Britain, Connecticut 06051

RE: Docket 26-08-05 Annual Energy Storage Solutions Program Review - Year 6 – Written Comments

Dear Mr. Gaudiosi,

Earthlight Technologies, LLC respectfully submits these written comments for filing in Docket 26-08-05. Please contact me with any questions regarding this filing.

Respectfully submitted,

/s/ Sean Riel
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STATE OF CONNECTICUT
PUBLIC UTILITIES REGULATORY AUTHORITY

Annual Energy Storage Program	**:**	**Docket No. 26-08-05**
Review – Year 6	**:**	**July 9, 2026**

EARTHLIGHT TECHNOLOGIES, LLC WRITTEN COMMENTS IN RESPONSE TO NOTICE

Earthlight Technologies, LLC ("Earthlight") submits these written comments to the Public Utilities Regulatory Authority ("Authority") in response to the *Notice of Written Comments* issued in this docket on June 16, 2026. As a leading provider of energy storage solutions for homeowners and businesses, we appreciate the opportunity to provide these comments to inform future changes in the Energy Storage Solutions ("ESS") program.

I. Enrollment Incentive Clawback

Earthlight shares the concerns the Program Administrators raised in their motion for reconsideration.[1] In particular, Earthlight cautions the Authority against creating an overly broad definition for participants who unenroll from the ESS Program prior to the expiration of the 10-year term. While there are a small number of customers who have voluntarily chosen to unenroll from the pre-Construct 5 version of the program, most have unenrolled due to circumstances outside their control, such as original equipment manufacturer ("OEM") bankruptcy. Enforcing a clawback mechanism for customers in this second segment would needlessly create negative customer experiences that would undermine future program participation. The Authority highlighted this risk when it correctly chose to waive incentive clawback fees for customers

[1] See Motion for Reconsideration No. 15, 25-08-05, pp 3-4

affected by the SunPower bankruptcy, stating "pursuing clawbacks would be inequitable and likely impractical.[2] Earthlight agrees with the Authority's determination in this instance.

Furthermore, Earthlight believes that the Authority has sufficiently accounted for ratepayer risk by shifting the monetization of incentives from a high upfront incentive to a lower enrollment incentive with higher performance-based compensation. Homeowners who choose to enroll in the program will do so based on the performance-based compensation they could claim over the ten-year period, rather than the lower enrollment incentive that would reduce the initial out-of-pocket cost.[3] In the event of OEM bankruptcy, which has been highlighted as the higher driver for battery unenrollment, Construct 5 provides protection for ratepayers by limiting performance incentive payments to only those customers who participate in seasonal dispatch.

II. Front-of-the-Meter (FTM) Storage Tariff

Earthlight does not provide comments on this issue at this time.

III. Recommended Change to Active Dispatch Parameters

Since the ESS program implemented Construct 5, the largest portion of the incentive for homeowners and businesses is the performance-based incentive, which is paid out over a ten-year period. While this new arrangement provides meaningful protections for nonparticipating ratepayers, it highlights ongoing risk to system owners, who may not be able to rely on those performance incentives without stronger language in the ESS program manual. The current program manual describes expected ranges of events per season[4], with 30-60 events in the summer months, and 1-10 in the winter months for Construct 5 customers. As a leading provider of energy storage for homeowners and businesses, Earthlight has heard concerns from both

[2] See Final Decision, 25-08-05 p 31

[3] Valued at $810 or $900 for 2 Tesla Powerwalls or 2 FranklinWH batteries.

[4] See ESS Program Manual, Table 14, p 60.

customer segments and financiers that the availability of these incentives is predicated on the EDCs calling for at least one dispatch event during the season. To encourage investment in these assets from both customers and financiers, Earthlight urges the Authority to include a requirement for minimum active dispatch events called per season that would be aligned with the lower bound of events identified in Table 14 of the ESS Program Manual.

IV. Conclusion

Earthlight appreciates the opportunity to provide these written comments to the Authority for the 26-08-05 Annual Review.

Respectfully submitted,
Earthlight Technologies, LLC

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