WHO WE ARE · DOCKET NO. 26-08-05

AN INDEPENDENT DER AGGREGATOR, OPERATING IN CONNECTICUT TODAY

Eight-plus years orchestrating distributed energy resources across utility, Community Choice Aggregation and retail partnerships in the US and internationally. Managed charging provider for Avangrid and Eversource in Connecticut.

300,000+
DERs orchestrated worldwide.

55+
Utility and retailer deployments.

2,641 MW
Enrolled nameplate capacity; 75 GWh shifted globally.

~10,000
EVs enrolled in Connecticut, charging 95% off peak.

Ranked #1 EV VPP specialist by Wood Mackenzie, 2024 and 2025.

TWO PROGRAMS. ONE SYSTEM. TWO COMPLIMENTARY GOALS.

MANAGED CHARGING PROGRAM

Shifts the ***charge*** off peak.

ESS PROGRAM

Pays for the ***discharge*** on peak.

Different adopted goals, not competing ones. One bidirectional vehicle can serve both, so the state should strive enable both in a timely fashion rather than choosing one.

ENCOURAGE RESIDENTIAL PARTICIPATION

~3,000

Bidirectional EVs registered in Connecticut today.

12+

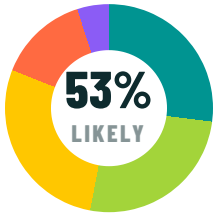
Passenger models capable of discharge.

95%

Of the time, passenger vehicles sit parked.

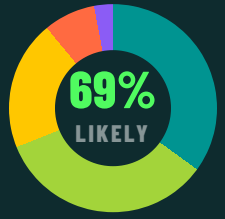
EV DRIVERS ARE READY TO ENROLL

WILLING TO PAY MORE FOR BIDIRECTIONAL CAPABILITY IN AN EV



- Very likely · 27%
- Likely · 26%
- Neutral · 28%
- Unlikely · 14%
- Very unlikely · 5%

WILLING TO ENROLL IN A BIDIRECTIONAL CHARGING PROGRAM



- Very likely · 35%
- Likely · 34%
- Neutral · 20%
- Unlikely · 8%
- Very unlikely · 3%

Plug In America survey, March 2025. N = 321.

Require ESS-enrolled bidirectional EVs to run a software charging solution that keeps them off the peak.

The rebound concern is a software problem, already solved.

95%

Off-peak charging across nearly 10,000 EVs enrolled in Connecticut today.

PROVEN ELSEWHERE

We already manage co-participation in the Massachusetts Clean Peak Standard alongside active managed charging, and enroll customers in two programs through a single flow.

DUAL PARTICIPATION NEARLY DOUBLES GRID VALUE

$575

Per EV per year, active managed charging alone.

→

$1,320

Per EV per year, with bidirectional export added.

ev.energy research with The Brattle Group. Same vehicles, the full stack of grid benefits.

THE STACK IS WHAT CLEARS THE INCREMENTAL COST

MANAGED CHARGING ONLY

$300/yr

Advanced tier, per port. Nowhere near a $10,000–$15,000 incremental bidirectional EVSE cost.

ESS EXPORT ONLY

$3,000/yr

$300/kW-yr at full seasonal contribution, years 1–10. No upfront incentive: paid only on average kW delivered during events, not on nameplate.

STACKED

$3,300/yr

Plus the thing the money cannot buy: a platform that keeps state of charge high enough for the event and holds the recharge off peak.

Performance compensation only pays when the port delivers. Stacking does not raise the ratepayer cost per kW; it raises the probability that the kW shows up.

Rates per the April 1, 2026 ESS incentive structure. Incremental cost range per the report: approximately $5,000–$6,000 per light-duty port, $10,000–$15,000 or more for a 30–40 kW commercial charger.

THE ASK

OPEN A V2G PROCEEDING

One venue to review these issues holistically, with vehicle-to-home in scope. V2H supports customer resilience and is compensated by neither program today.

KEEP REQUIREMENTS, ADD A PATHWAY

DERMS integration, telemetry, UL certification and ISO 15118-20 are workable as proposed. Let them update as standards evolve, without filing new programs.

IF RESIDENTIAL WAITS, COMMIT TO A TIMELINE

Adopt official program year goals and require quarterly status filings on removing the remaining barriers. Certainty is what lets the market invest.