75 Charter Oak Avenue, Suite 1 - 103, Hartford, CT 06106
T 860.563.0015
ctgreenbank.com

CONNECTICUT GREEN BANK

August 28th, 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 2

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 August 12th, 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. Recommended Programmatic Changes and 2. Bidirectional Electric Vehicle (EV) Participation**

CONNECTICUT GREEN BANK RESPONSE:

1) Recommended Programmatic Changes

The Green Bank supports all of the proposed Program Administrators' recommendations. The recommendations incorporate lessons learned, support the transition to Construct 5, strengthen grid and ratepayer value, expand participation opportunities, and reduce administrative and technical barriers We address a few of these recommendations below.

Operational Control & Telemetry requirements

Reliable performance data is essential to incentive calculations, Program evaluation, and EM&V efforts. The proposal appropriately balances flexibility in communication protocols with telemetry standards, audits, and enforcement mechanisms. These changes advance Program Objectives 1, 3, and 5.

Bidirectional Electric Vehicle (EV) enrollment for Medium and Heavy Duty

The Green Bank supports continued development of a bidirectional EV enrollment pathway. Bidirectional EVs could expand dispatchable distributed resources and support Program

Objectives 1, 2, and 3. Additionally the Green Bank supports EOE's recommendation that Bidirectional EV charging be included in future clean energy Programs as well.[1]

Legacy Change Orders

The Green Bank also supports reasonable flexibility for Legacy project change orders. Changes in system kW or kWh can occur during normal project development and should not unnecessarily cause an otherwise viable project to lose its eligibility. At the same time, allowing PA discretion to determine if a change is reasonable or not would be beneficial as to not have to create another rule or wait for a determination to close a project out. This recommendation advances Program Objectives 3 and 5.

Add-on Systems

Legacy customers should not be unnecessarily prevented from adding useful storage capacity solely because their original systems already participate under a closed Passive Dispatch tranche. Allowing on a case-by-case basis either repayment of the unearned upfront incentive and conversion to the current incentive structure or, where appropriate, a blended Performance Incentive Rate provides flexibility while preserving appropriate treatment of previously incentivized capacity. This recommendation advances Program Objectives 2, 3, and 5 by facilitating additional grid-capable storage deployment while maintaining an orderly incentive framework.

Seasonal Performance Incentives & Round Rates

The Green Bank supports the proposed seasonal Performance Incentive payment structure and clarification of seasonal incentive amounts. Given the identified DERMS limitations associated with administering a single annual payment, two seasonal payments are what the DERMS is accustomed to administering. Rounding the Underserved and Low-Income rates simplifies implementation and customer communications. These changes support orderly Program administration and continued access to enhanced incentives for priority customers and therefore advance Program Objectives 3, 4, and 5.

The Green Bank supports all of the proposed Program Administrators' recommendations and has a few more considerations below.

Customers that Move

As the Program has developed, and with consideration of the upfront or potential enrollment incentive, clear guidelines should be established for circumstances in which an Energy Storage Solutions customer sells a home where an enrolled battery system is installed. The Program Administrators should avoid a process that unnecessarily interrupts the battery's participation in

[1] https://www.dpuc.state.ct.us/dockcurr.nsf/4b3c728dd1c0d642852586db0069aa70/762811be4899161685258e5f005d67ba/$FILE/26-06-04%20EOE%20Written%20Comments%20FINAL.pdf

the Program solely because ownership of the home has changed and the new homeowner has not yet completed enrollment.

Under the current DERMS enrollment process, the EDCs may identify that a customer has moved when the associated utility account number changes, including at the end of a summer or winter performance season. A change in customer account number triggers an automatic unenrollment of the BESS from the DERMS, and it remains unenrolled until the new homeowner affirmatively completes a new enrollment. The Program risks losing the participation of an otherwise eligible and operational asset. This concern is heightened because the Program's shoulder-month enrollment windows are limited, leaving little practical time to identify the new homeowner, obtain updated documentation, and complete reenrollment before the next performance period.

For these reasons, PURA should require that the EDCs, through their DERMS providers, keep the battery system enrolled under the original customer until the new homeowner is able to complete the reenrollment process. This approach supports continuity of Program operations, allows the battery to continue contributing to Program goals, and reduces the likelihood that a participating system will be lost due to an administrative gap during a real estate transfer. It also recognizes that only the EDCs have access to timely information regarding utility account changes, while the original homeowner may have limited incentive to facilitate reenrollment if a clawback could apply for non-performance.

Allowing the system to remain enrolled during this transition means payments could continue to be issued to the original customer by check or other existing payment method until the new homeowner completes enrollment. This is because ESS Performance payments are not paid through on-bill enrollment. This interim treatment would help avoid unnecessary lag time, prevent the loss of an available distributed energy resource, and provide a clear and administratively workable rule for homeowner transitions. Accordingly, the Program should establish guidance that maintains enrollment of the battery system during the transition period and avoids interruption of participation while the new homeowner is brought into the Program.

In addition to customers moving, the Green Bank believes there may be some exceptions that might need to be granted on clawbacks due to unforeseeable reasons such as death, foreclosure, or other legal issues outside the control of the Program Administrators. Allowing the Program Administrators to have discretion is needed to allow for these natural and unforeseeable issues.

Counterfactual 6

Green Bank supports use of Counterfactual 6 (CF6) for Energy Storage Solutions because CF6 better reflects the forward-looking grid conditions in which storage resources are expected to operate. While Counterfactual 1 may be appropriate for C&LM because it excludes incremental energy efficiency, Energy Storage Solutions is not an energy efficiency program and should be evaluated using assumptions that reflect the broader system context storage is intended to support. CF6 was also not available at the launch of the Energy Storage Solutions Program which is why it was not originally proposed for use in the Program.

Interconnection

In addition to the annual Order 15 filings in Docket No. 25-08-05 regarding the interconnection status of projects in the Energy Storage Solutions Program, it would be beneficial for the industry and stakeholders to have transparent access to all initially proposed, itemized interconnection costs quoted by the EDCs, beyond application fees, for each project that enters the interconnection queue. Providing transparent visibility into the upgrades or additional work deemed necessary for each project, in a format that enables comparison across projects and EDC territories, would support greater industry understanding to some of the attrition rates the Program is seeing.

Including final itemized cost information for all upgrades and studies at each stage of the interconnection process to see where costs change the most during the process would also help identify exactly where developers may have been required to abandon projects and would provide greater transparency to support more accurate project cost estimates in the future. While this transparency alone would not resolve interconnection delays or other challenges developers may encounter, it would help the industry better assess instances in which costs may be unreasonable or inequitable.

2) Bidirectional Electric Vehicle (EV) Participation

The Green Bank reiterates its support for the joint recommendations provided by the Program Administrators in the Bidirectional EV Working Group Final Report to advance vehicle-to-grid ("V2G") charging opportunities for commercial fleet operators in Summer 2027.

In response to the Authority's specific comment request on ratepayer benefits regarding bidirectional EV participation in ESS versus managed charging, the Green Bank notes that the EDCs recently published their Joint Annual Report – Program Cycle Year 5 in Docket No. 26-08-03[2]. Attachment 13[3] associated with the Annual Report includes specific discussion of residential EV managed charging participation data and program developments. The Green Bank encourages the Authority to utilize the findings made available in Section V. 2025-2026 Off-Peak Managed Charging Impacts to evaluate the potential grid resiliency benefits of managed charging participation versus theoretical, future residential bidirectional EV participation in ESS. Doing so may require specific EM&V analyses of the overall ratepayer benefits accrued through residential EV participation in managed charging. In terms of evaluating average resource potential across these two distinct vehicle-to-everything technologies, the Green Bank notes that participants in the Bidirectional EV IES pilot

2 https://www.dpuc.state.ct.us/dockcurr.nsf/8e6fc37a54110e3e852576190052b64d/a9fb8a951709e89b85258e480066e9a5/$FILE/2026-08-03%20Attachment%2013%20Residential%20Managed%20Charging%20Load%20Impact%20Evaluation%20%2326-08-06.pdf

3 https://www.dpuc.state.ct.us/dockcurr.nsf/8e6fc37a54110e3e852576190052b64d/a9fb8a951709e89b85258e480066e9a5/$FILE/2026-08-03%20Attachment%2013%20Residential%20Managed%20Charging%20Load%20Impact%20Evaluation%20%2326-08-06.pdf

utilize 11.5 kW bidirectional chargers. The Green Bank recommends that this topic be evaluated in the future V2G-focused docket that the Program Administrators recommended establishing in the Bidirectional EV Working Group Final Report.

CONCLUSION

The Green Bank appreciates the opportunity to submit these Written Comments in Docket No. 26-08-05 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:
Sergio Carrillo
Managing Director of Incentive Programs
Connecticut Green Bank
Phone: (860) 258-7826
Sergio.Carrillo@ctgreenbank.com