

# Connecticut Distributed Generated Interconnection Working Group Meeting Summary

## State of Connecticut Public Utilities Regulatory Authority Office of Education, Outreach & Enforcement

October 14, 2025

#### Introduction

During the October 14, 2025 Interconnection Working Group (IX WG) meeting, the IX WG discussed the Energy Solutions Storage (ESS) Program as a follow-up to the <u>ESS Technical Meeting</u> which occurred on September 23, 2025. This program is part of the Energy Storage Solutions proceeding (Docket No. 25-08-05).

Additionally, ConnSSA members presented a list of new topics for the IX WG to discuss.

#### Discussion: Energy Solutions Storage

Val Stori (GPI) provided a summary of the ESS technical meeting as well as the main issues that remained after the meeting— the bulk upload of existing battery systems to be approved for export. The IX WG provided a venue for discussing whether bulk upload would be possible and what the process could look like and how much it would cost. The notes below summarize the discussion.

Dominic Gatti (Tesla): Tesla has been a participant in the 25-08-05 Docket. There is a large amount of distributed storage in CT that is not enrolled in ESS. When we are looking at opportunities to increase flexibility in the grid, there is an opportunity to get already installed battery systems into the ESS program so they can be deployed into the grid. When the systems were installed prior to the existence of the ESS program, they were studied for their ability to safely deploy to the grid. Tesla understands that grid conditions have changed since those batteries were approved, but this is a great opportunity to bring existing systems into the fold and achieve state goals and lower costs.

Sara Pyne (CT Green Bank): There is some ESS language that requires residential systems to have export capabilities. That is one of the items that started this conversation. There might not be a process established for projects going from non-export to export. It would be helpful to learn about whether such a process is feasible. This issue has also been raised by SunRun and GoodLeap.

Jennifer Runyon (Eversource): An export connection is not required in all Eversource programs, and it may take a lot of time and resources to study and implement. Is it an option for existing systems to join ESS as non-export?

Carl Nowiszewski (Eversource): Existing projects were studied for whatever they applied for. For example, if the application said the system was non-export, the system would not have been studied for export. If the application said the system would be exporting, it may have needed some system upgrades that the developer may have chosen not to have studied and pursued at the time. For the systems that were approved as non-export, a change to exporting would be considered a change of state by the EDCs and would need a reapplication.

Val Stori (GPI): Summarizing that to enroll in ESS program, the batteries would need to be able to export, so they would need to be restudied depending on whether that was done at the time of application. Moving forward, what would be the timelines and a cost-effective way to get all these systems restudied?

Dominic Gatti: The position that Tesla has taken is that getting these systems into the ESS program would be worthwhile. If an existing system were to be approved for participation in the ESS program as non-export, the batteries' potential would be capped. It makes more sense to have batteries participating as export systems. A one-by-one application restudy of each existing system would be costly; this is why Tesla has asked via its filing if restudy could be done in bulk. What is the difference between a screen and a study?

Carl Nowiszewski: It is not expensive nor time consuming once an application has been refiled to do the transformer screen and determine if it needs to be updated. But PowerClerk needs to be updated. The work is on the applicant side probably more than it is on the utility side. If this is done in bulk, that burden is transferred over to the utility side. The restudy is not an impact study, but more of a screening. Suggests that each non-exporting system owner should be asked if they would like to be part of the ESS incentive program. If so, there would be a \$200 application fee.

Val Stori: Let's think about scale--how many existing systems might go through this process?

Dominic Gatti: Approximately 10,000 battery systems installed in CT. Not all would be good candidates for the program.

Sara Pyne: The CTGB has heard from other developers that they are in the same situation. There may be a couple hundred more systems that would like to enroll in the ESS program.

Rob Sazanowicz (United Illuminating): EDCs still need to do the same amount of restudy whether it is by bulk upload or one-by-one. It would be a shift of the administrative burden from developers (needing to ask each battery system owner if they would like to enroll in ESS) to EDCs. Without an application fee, that cost would be passed to rate payers.

Dominic Gatti: Raises questions of what would happen if a couple hundred existing systems were studied—is there a risk that the first 5 systems on the circuit pass the screens, and the 6<sup>th</sup> one triggers a failure? Is there a way to have all of the systems on a circuit pass or none of them pass?

Rob Sazanowicz: Systems would need to be looked at in some sort of order. Unlikely that one would kick another one out; rather, it is more likely that changes to the system would cause those issues.

Sara Pyne: Seeks to clarify whether a change order process would take place? All of these systems are already installed and the equipment is not changing; all the system information is in PowerClerk.

Rob Sazanowicz: If it's already an approved system, it shouldn't be a particularly long process for EDCs to do these technical screens. Theoretically, a technical screen can be done in a couple of hours. (Due to the length of the queue, it takes a project much longer to move through to a technical screen.)

Carl Nowiszweski: Clarifies whether there would be a change to the battery's system to allow it to export. Is that a remote software change?

Dominic Gatti: The changes are "over-air updates" through the installer apps.

Sara Pyne: What information is needed in a new application? Is it simply a check-box to change from non-export to export?

Rob Sazanowicz: From your customer perspective, yes. But from EDC perspective, it is a review of the system conditions.

Dominic Gatti: Provides summary and rationale—Tesla is looking for cost-effective ways to support grid flexibility. This would help drive down rates and meet state goals. There are 415 systems currently enrolled in ESS and over 6000 batteries already installed with the potential to contribute to grid flexibility. \$200 per system for the application fee is not a lot compared to other IX costs, but it is expensive compared to \$0.

Rob Sazanowicz: Likely no wiggle room in reducing application fee/screening costs as it already does not cover the true cost of processing applications.

Conversation continued on the costs and burden of approaching each existing battery customer individually and the potential low response rate versus the potential opportunity to review all existing systems that meet the technical requirements for ESS program eligibility. A customer could earn up to \$720 a year if enrolled in the ESS program. So there is still a financial incentive for entering the program despite the \$200 application fee. However, it is not guaranteed that every application will result in a project that will pass the screens.

Dominic Gatti: Consider if there are other ways to share these costs in bulk? And if bulk review is not an option, what are alternatives-- a customer engagement campaign?

Can the CTGB fund any of this engagement or portion of technical screens?

Val Stori: Summarizes the discussion, resulting in bulk review is not an eligible path forward.

#### ConnSSA: New IX WG Topics for Consideration

#### Issues for Tuesday Oct. 14 Meeting:

- Status of Carl's straw poll (combines several SPRINT decisions): Has been incorporated in red line and clean versions of IX guidelines and submitted to PURA.
- Status of EDCs Interconnection Guidelines update to include definitions for "Export Capacity" and "Power Control Systems." Did the WG agree on definitions at the last meeting? Yes.
- How does CT's Flex IX process compare to what's occurring in the MA IIRG [for Joe Debs' Flex IX discussion]? TBD at FlexIX WG.

#### 25-01-27 Compliance Updates:

- EDCs to establish new, separate, and expedited interconnection processes for commercial projects within the 50 kW to 500 kW range that are either co-located with onsite load or served by on-site infrastructure (PROP. 3).
- EDCs discussions with the Interconnection Working Group on interconnection review timelines and costs for non-RRES projects under 1 MW. (PROP. 22)
- EDCs to lead a stakeholder group within the existing Interconnection Working Group to develop a uniform flexible interconnection program for Connecticut. (PROP. 29)

#### **FUTURE POTENTIAL MEETING AGENDA ITEMS**

### ConnSSA introduced a few of potential topic areas for the WG to consider for a future meeting:

- A discussion on impact studies to include an explanation of why distribution impact studies are launched in the first place; What steps are being taken between once the study commences (agreement signed and fee paid) to when the initial study draft report is shared with customer, approximately how long does each step take;
- Line-side tap issue. What is the final EDC position on these?
- What steps are EDCs taking to ensure CT's IX policies are best in class? IX policy
  quality control is something the EDCs, as program administrators, should be responsible
  for.
- Update on Buy-All conditional approvals
- Revisit data reporting of EDC's interconnection queue.

#### FlexIX WG Update

Joe Debs (Eversource) provided an update: Eversource has met with UI and has another meeting scheduled. A technical meeting with the whole group will happen soon. We are still on target with completing the requirement for PURA.

#### Other Items and Next Steps

- Proposal 33 from PURA's 8/20 order re. Develop a plan to streamline meter payment, processing, and communication of status updates to be discussed at November meeting.
  - ... "the Authority directs the EDCs to collaborate with the Interconnection Working Group to develop a plan aimed at streamlining meter payment, processing, and communication of status updates to developers. No later than January 1, 2026, the EDCs shall file a plan for the Authority's review and approval that must, at a minimum, address the following:
    - identify opportunities to streamline and improve meter payment processes;
    - improve the communication of meter order status updates to developers;
       and
    - evaluate and eliminate unnecessary steps in the meter procurement process.
  - In developing this plan, the EDCs must carefully balance developer concerns with the cost implications for ratepayers."