Response to the Illinois Power Agency Storage for All Program – Request for Information #1

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PUBLIC (REDACTED) VERSION. Confidential cost and pricing information has been redacted and marked [REDACTED – CONFIDENTIAL]. An unredacted confidential version has been provided to the Agency separately.

Executive Summary

- **$7.6 million is far from sufficient (Question 1).** ILSFA sites already energized by May 2025 represent up to about **$47.0–$59.2 million** in Storage for All demand at our proposed design, **6.2–7.8 times the cap**. At a realistic 27 kWh retrofit, $7.6 million funds only about **327 homes**, not 700.
- **Do not starve ILSFA solar to pay for storage (Questions 1 and 2).** Residential Solar (Small) requests are **3.62 times** its budget, and every storage project depends on a co-located ILSFA solar project. **We prefer new funding.** If the carve-out proceeds, use the **full 25%** as a minimum, draw first on budget that would otherwise go unused, and seek additional funding to backfill solar.
- **Correct the cost assumptions (Question 1.2).** At IPA's own $1,125/kWh, a typical **27 kWh** retrofit costs **$31,375 (about $1,162/kWh)** including the remote meter, for a Storage for All draw of about **$23,275**. Retrofits need a remote meter (about $1,000 residential; $2,000 large residential and NP/PF), and about 75% also need electrical upgrades of about $3,000. One Powerwall 3 is rarely adequate.
- **Incentive design (Questions 3, 6 and 7.1).** Up to **$1,000/kWh**, stacking with the ~$300/kWh utility rebate and not exceeding net cost, with per-system caps of **27 kWh** (small residential) and **200 kWh** (large residential and NP/PF); allow hosts to go beyond the program's funding at their own cost. Pay it as a **one-time payment to the installer, as close to system completion and energization as possible**, with no partial or milestone payments and **no REC**

adders. Keep storage applications, contracts and payments **always separate from solar**, even for new combined installations.

- **No-cost by default (Questions 9 and 11),** with coordinated outside funding and optional voluntary host contributions (voluntary upsizing, uncovered electrical upgrades or a gap-closing payment) under safeguards that protect the 50% savings requirement.
- **Conservative benefit and funding assumptions (Questions 10, 13 and 15).** Storage benefits are much harder to model than solar. Potential VPP revenue should not be included in the Agency's incentive assumptions, and savings projections should not count on arbitrage or VPP revenue. Assume only the utility rebate; do not assume federal tax credits, USDA REAP, or federal Solar for All will be available when the program starts, likely 2028 or later.
- **Long-term protection (Question 6).** Require a third-party long-term warranty with active monitoring as an eligible cost.
- **Large residential and NP/PF.** A single tier with a 200 kWh per-system funding cap; Funded battery power and grid export limited to 150% of 12-month peak demand; and recognition of prevailing wage costs for NP/PF.
- **Contractor certainty (Question 2).** Project funding needs to be reserved at the time of application, including before final interconnection approval, providing multi-year budget visibility and transparent capacity tracking.

Introduction

360 Electric, LLC, doing business as 360 Electric, Heating/Cooling ("360 Electric"), is a family-owned company based in Morton, Illinois, in business since 2014, providing electrical, HVAC, generator, solar and battery storage services. 360 Electric is an ILSFA/Illinois Shines Approved Vendor (#2049) and serves as Marketing & Sales, Disclosure, Installer and Service Designee for multiple Approved Vendors. Since entering the solar market in 2021, we have installed hundreds of residential and dozens of commercial solar systems, and dozens of residential and small commercial battery storage systems, within about a two-hour drive of Peoria.

We appreciate the Agency's early stakeholder engagement. Our main concern is that the Appendix A assumptions understate the real cost of a no-cost installation and model only a residential battery, although the large residential (multifamily) and Non-profit and Public Facilities (NP/PF) subprograms are also eligible.[1] If incentives are set from these assumptions, many projects may not get built. Our comments follow the RFI's numbering.

[1] 20 ILCS 3855/1-56(b)(2), (b)(3) and (b-15), as amended by Public Act 104-0458 (CRGA): https://www.ilga.gov/Documents/legislation/ilcs/documents/002038550K1-56.htm

Program Funding (Questions 1, 1.1, 1.2 and 2)

Questions 1, 1.1 and 2 – Recommended budget

Our position: about $7.6 million is far from enough, and taking it from ILSFA would harm the solar program that storage depends on. We prefer **new, additional funding** for storage. If the carve-out proceeds, the Agency should allocate **the full 25% as a minimum**, not a smaller or phased amount, draw first on any budget that would otherwise go unused, and **seek additional funding at the same time** to grow Storage for All and backfill solar. A smaller allocation would take funds from solar without creating a viable storage program. Because CRGA allows unused Storage for All funds to be reallocated to waitlisted ILSFA projects, a full allocation does not risk leaving funds unused.[2] Wherever the Agency relies on coordinated outside funding, it should also allow voluntary host contributions (Question 11), so that a project is not lost when outside funding falls short.

The eligible ILSFA solar subprograms are largely oversubscribed. The PY26-27 ILSFA dashboard shows:[3]

PY26-27 subprogram	Projects submitted	Incentives requested	Program-year budget	Requested ÷ budget
Residential Solar (Small)	749	$32.14 million	$8.89 million	**3.62×**
Non-Profit and Public Facilities	87	$15.23 million	$12.70 million	**1.20×**
Residential Solar (Large)	5	$0.83 million	$8.89 million	0.09×
All ILSFA subprograms	848	$99.64 million	$50.80 million	**1.96×**

The three eligible budgets total $30.48 million, matching the RFI's $30.5 million. The Residential Solar (Small) window was open for only two weeks, and its budget covers only about 28% of the dollars requested.[4] The pattern is not new: in October 2025 the ICC approved an additional $20 million while a Residential Solar (Small) waitlist already existed, and by February 2026 that waitlist held $16.29 million.[5]

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[2] 20 ILCS 3855/1-56, as amended by CRGA (note 1)

[3] Illinois Solar for All, Project Dashboard (PY26-27, updated October 28, 2026): https://www.illinoissfa.com/vendors/project-dashboard/

[4] The window was open September 14–25, 2026 (Illinois Solar for All, "Welcome to the 2026-2027 Program Year" (June 1, 2026): https://www.illinoissfa.com/announcements/2026/06/welcome-to-the-2026-2027-program-year/). As of October 28, 2026, no Residential Solar (Small) projects had been approved. For NP/PF, 22 projects (699 kW, $2.29 million) had been approved, and $12.94 million in pending requests exceeded the $10.40 million remaining. Submitted capacity: 7,168 kW Residential Solar (Small), 4,873 kW NP/PF, 491 kW Residential Solar (Large) and 31,702 kW across all subprograms (ILSFA Project Dashboard (October 28, 2026) (note 3)).

[5] The October 2025 increase included $7 million for Residential Solar (Small) and $5 million for NP/PF (Illinois Solar for All, "Additional Funding for Illinois Solar for All Approved by ICC" (Oct. 17, 2025): https://www.illinoissfa.com/announcements/2025/10/additional-funding-for-illinois-solar-for-all-approved-by-icc/). In February 2026, ILSFA stated that "the majority of the funds are expected to be exhausted quickly by projects on the

What the carve-out would displace. At the RFI's average ILSFA incentive of $53,585, $7.6 million equals about **142 solar projects per year**, or about **85% of the Residential Solar (Small) budget** or **60% of the NP/PF budget**. Without ILSFA solar there is no Storage for All, because every storage project must be co-located with an ILSFA solar project.

Question 1 – Demand is a multiple of the cap

Storage for All is available to *current and future* participants of Residential Solar (Small) (1–4 units), Residential Solar (Large) (5 or more units) and NP/PF; Community Solar is excluded.[6] By May 31, 2025, **1,494 Residential Solar (Small) projects (10.6 MW AC), 4 Residential Solar (Large) projects (2.6 MW AC) and 118 NP/PF projects (16.2 MW AC)** had been energized,[7] and about 2,000 more have been invoiced or submitted since.[8]

Illustrative Storage for All demand from ILSFA sites energized by May 31, 2025, at the proposed $1,000/kWh and per-system caps, assuming every site sought storage:

Segment	Sites	Storage for All incentive per site	Illustrative demand
Small residential, 27 kWh planning case and cap	1,494	$23,275 (Question 1.2)	$34.8 million
Large residential, 100–200 kWh (200 kWh cap)	4	up to $100,000–$200,000	up to $0.4–$0.8 million
NP/PF, 100–200 kWh (200 kWh cap)	118	up to $100,000–$200,000	up to $11.8–$23.6 million
Total	**1,616**		**up to $47.0–$59.2 million**
Compared with the $7.6 million cap			**about 6.2–7.8 times the cap** (covers about 13–16%)

These figures are illustrative: not every site will want or suit storage, and large-site draws are shown at the cap as an upper bound. Still, the small residential sites alone come to about $34.8 million, roughly 4.6 times the cap; even at IPA's $10,000 per home they would come to $14.9

waitlist." Residential Solar (Large) is the exception: in February 2026, ILSFA made about $23.09 million of remaining Residential Solar (Large) budget available to Residential Solar (Small and Large) projects (Illinois Solar for All, "Available Budget Remains for Residential Solar Projects in the 2025-2026 Program Year" (Feb. 9, 2026): https://www.illinoissfa.com/announcements/2026/02/available-budget-remains-for-residential-solar-projects-in-the-2025-2026-program-year/).

[6] 20 ILCS 3855/1-56, as amended by CRGA (note 1)

[7] Illinois Solar for All, *PY2024-2025 Annual Evaluation Report*, Table 7 (energized projects and capacity) and Table 18 (ownership type): https://www.illinoissfa.com/wp-content/uploads/2026/06/ILSFA-PY2024-2025-Annual-Evaluation-Report.pdf

[8] PY25-26: 1,127 Residential Solar (Small) and 53 NP/PF projects invoiced (ILSFA, "Welcome to the 2026-2027 Program Year" (note 4)). PY26-27 to date: 749 Residential Solar (Small), 5 Residential Solar (Large) and 87 NP/PF projects submitted (ILSFA Project Dashboard (October 28, 2026) (note 3)).

million, about twice the cap.[9] Each large residential or NP/PF site of 100–200 kWh draws up to $100,000–$200,000, the budget of about **4–9 residential retrofits**.[10] The table also excludes the roughly 2,000 sites added since May 2025 and every new solar plus storage project.

Question 1.2 – Corrections to the Appendix A assumptions

Our corrections, item by item:[11]

Appendix A item	IPA assumption	360 Electric correction
Installed cost per kWh	$950–$1,300 (median $1,125)	[REDACTED – CONFIDENTIAL] Retrofits also need a remote meter for AC coupling: about $1,000 small residential; about $2,000 large residential and NP/PF.
Typical system size	One Powerwall 3 (13.5 kWh / 11.5 kW)	**Rarely sufficient** (see below). Typical systems are **27 kWh**: Powerwall 3 + Expansion, or two Powerwall 3 units.
Cost of a 27 kWh retrofit	Not addressed	$1,125/kWh × 27 kWh = $30,375, plus the $1,000 meter = **$31,375 (about $1,162/kWh)**. After the $8,100 utility rebate, Storage for All pays about **$23,275** (within the $27,000 cap).
Cost of a 13.5 kWh Powerwall 3	~$15,000 ($15,187)	Retrofit: **$16,187** with the meter (about $1,199/kWh), $19,187 where an electrical upgrade is needed, and an expected average of $18,437.
Cost of incentivizing a project	~$10,000 (after ~$4,000 rebate and ~$270 VPP revenue)	IPA's own figures ($15,187 − $4,050 − $270) give about $10,867. The ~$270 VPP offset should **not be deducted** (Question 15); without it, about $11,137, or $12,137 for a retrofit with the meter.
Projects fundable with $7.6 million	~700	About **327** homes at 27 kWh; only 563–626 even at 13.5 kWh; fewer once large residential and NP/PF projects are included.
Scope	Residential, one Powerwall 3	**No assumptions for large residential or NP/PF**, although both are eligible (see the next section).
Electrical upgrades	Not addressed	About **75%** of existing ILSFA homes need upgrades of about **$3,000** (about $3.4 million across the 1,494 built homes). We propose funding them outside Storage for All (Question 9).

Why retrofits need a remote meter. A battery added to an existing ILSFA system must be AC-coupled, because the solar already has its own inverter, and Tesla requires AC-coupled solar to be metered with a Tesla Remote Meter so the Powerwall can see and control it.[12] Large

[9] For contrast, at IPA's 13.5 kWh case and the $13,500 cap, residential demand would be $20.2 million and total demand $32.4–$44.6 million (4.3–5.9 times the cap). Electrical upgrades (about $3.4 million across the 1,494 homes; Question 1.2) are not included.

[10] With a revenue-grade meter for AC coupling (about $2,000) and costs of about $1,000/kWh, the funded portion costs roughly $102,000–$202,000 per site. Draws are lower where the utility rebate applies and net cost is lower.

[11] Retrofit cost items (remote meter and electrical upgrades) reflect 360 Electric's installation experience and the sources cited in this section. Utility rebate assumptions are taken from Appendix A and the utility tariffs.

[12] Tesla, *Powerwall 3 System Design Guide*, "Metering Considerations": https://energylibrary.tesla.com/docs/Public/EnergyStorage/Powerwall/3/SystemDesign/en-us/GUID-D1B59029-10BB-4AD3-8BDE-527ACF873E2D.html. The meter kit lists at about $250–$290 (Distributor list prices for the Tesla Remote Energy Meter kit, October 2026: Sun Supply PV ($247), https://sunsuppv.com/product/tesla-remote-energy-meter-kit/ ; Solartek ($290), https://solartekcorp.com/collections/tesla ; CKR Solar ($250),

residential and NP/PF sites need a revenue-grade meter with current transformers and communications, at about $2,000 installed.[13]

Why one Powerwall 3 is rarely enough.

- **Power:** most homes in our Ameren territory have 200A service; one Powerwall 3 provides at most about 48A (11.5 kW).[14]
- **Energy:** 13.5 kWh supports whole-home backup for only about 1–2 hours, depending on energy load. The 3–5 hour ride-through our customers experience (Question 13) is on 27 kWh systems.
- **Existing solar:** Tesla allows at most **7.68 kW AC** of existing (AC-coupled) solar in the backup circuit with one Powerwall 3, **10 kW** with a Powerwall 3 plus Expansion units, and **17.68 kW** with two Powerwall 3 units and one Expansion. The average energized ILSFA small residential system is 7.1 kW AC,[15] so many are at or above the single-unit limit. Above the limit, part of the solar must be moved off the backup circuit, downsized or controlled, or batteries added; and during an outage, solar the battery cannot absorb is throttled and may be shut off entirely, exactly the wrong outcome for a household relying on backup.[16]
- **What customers install:** most of our customers do well with one Powerwall 3 plus one Expansion (27 kWh, about 48A); many need two Powerwall 3 units (27 kWh, about 96A) for the whole home. We therefore recommend a **27 kWh planning assumption and per-system cap** for small residential, with added capacity at the household's voluntary cost (Question 11).

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https://www.ckrsolar.com/blog/how-much-does-a-tesla-powerwall-3-actually-cost/); our $1,000 is an all-in installed cost (mounting, CT installation and commissioning) with no further markup.

[13] An industry estimate for small commercial revenue-grade metering is about $1,300–$2,500 installed (SurgePV, "Solar Revenue Meter 2026" (cost table; small commercial under 100 kW: $1,300–$2,500 installed): https://www.surgepv.com/blog/solar-revenue-meter ; for hardware alone, ANSI C12.20 revenue-grade meters list at about $280–$595 (MicroDAQ, Accuenergy Acuvim-L and Acuvim II): https://microdaq.com/manufacturers/accuenergy/power-meters.php).

[14] Tesla, *Powerwall 3 Installation Manual with Gateway 3*, "Powerwall 3 Specifications" (11.5 kW / 48 A continuous with 60 A overcurrent protection; 5 kW maximum charge, 8 kW with Expansion units; 10-year warranty): https://energylibrary.tesla.com/docs/Public/EnergyStorage/Powerwall/3/InstallManual/Gateway/3/en-us/GUID-EC527BC7-4750-4425-BBC4-DB8C000339B3.html

[15] ILSFA, *PY2024-2025 Annual Evaluation Report*, Tables 7 and 18 (note 7)

[16] Tesla cautions that exceeding the limit risks equipment damage from high fault current during an outage and can void the Powerwall warranty. The 17.68 kW figure is 10 kW for the unit with the Expansion plus 7.68 kW for the other. Even within the limit, when solar production during an outage exceeds what the battery can absorb (about 5 kW for one Powerwall 3, or 8 kW with Expansion units), the Powerwall shifts frequency to throttle the solar and may have to shut it off entirely (Tesla, *Powerwall 3 System Design Guide*, "AC-Coupled Solar System Sizing" (7.68 kW AC per Powerwall 3; 10 kW AC with Expansion units; fault-current and warranty caution; frequency shifting and possible PV shutdown when excess PV exceeds the charge rate): https://energylibrary.tesla.com/docs/Public/EnergyStorage/Powerwall/3/SystemDesign/en-us/GUID-23D242D1-8D65-47B9-9118-57002FFD84D2.html; Tesla, "Powerwall 3 Specifications" (note 14)).

Why most retrofits need electrical upgrades. In our experience, about 75% of existing ILSFA homes need upgrades, at about $3,000 each (about $2,250 averaged across all sites):

- **Islanding device:** backup requires a Tesla Backup Switch (a meter collar) or the more expensive Gateway 3.[17] In our experience, the Backup Switch can be used on a retrofit only where the original solar was interconnected with a back-fed breaker in the main panel; otherwise (for example, a supply-side tap) the Gateway 3 is required.
- **The 120% busbar rule:** under the National Electrical Code, a 200A panel with a 200A main breaker can accept back-fed breakers totaling only 40A (200A × 120% − 200A).[18] The existing inverter typically uses most or all of that, and a Powerwall 3 at full output needs its own 60A breaker,[19] so the battery usually requires a panel or busbar upgrade, a main-breaker derate, a supply-side connection, a Gateway 3, or a meter or service upgrade. Limiting the Powerwall's output instead reduces the backup power the household receives.
- **Whole-home backup** on 200A service with one 48A Powerwall 3 usually requires load management or a critical-load panel.

The Storage for All budget cannot realistically pay for these upgrades as well, so we propose coordinated outside funding and voluntary host contributions (Question 9). They are real costs that must be funded somewhere for retrofits to proceed.

Question 2 – Contractor certainty is a precondition for success

Before a single battery is installed, a contractor invests in sales, customer education, income verification support, site assessment, design, engineering and applications. Storage requires much more customer education than solar: each customer must decide how much backup power (kW) they need and for how long (kWh). An underfunded program rations through lotteries and waitlists, as ILSFA does today, which makes participation an unworkable business strategy, falls hardest on **small, local and equity-eligible contractors**, and **erodes customer**

[17] Tesla, *Powerwall 3 System Design Guide*, "Tie-in" and "Design Considerations": https://energylibrary.tesla.com/docs/Public/EnergyStorage/Powerwall/3/SystemDesign/en-us/GUID-3348B953-9D14-4254-AD6F-1F747B6E7036.html ; https://energylibrary.tesla.com/docs/Public/EnergyStorage/Powerwall/3/SystemDesign/en-us/GUID-3E19662A-E501-47DB-81AE-E9EC19735B8B.html. The Backup Switch requires a compatible single-phase Form 2S meter socket (CL100 or CL200), a main breaker of 200A or less, and utility and local inspector acceptance; otherwise a standalone meter panel is needed. The Gateway 3 is a 200A device installed on the service conductors that can serve as the home's service disconnect. Distributor list prices are about $395–$472 for the Backup Switch and about $1,100 for the Gateway 3 (Distributor list prices, October 2026. Backup Switch: Sun Supply PV ($395), https://sunsuppv.com/product/tesla-backup-switch-kit-1624171-00-x/ ; PES ($472), https://www.portlandiaelectric.supply/products/tesla-backup-switch-meter-collar . Gateway 3: Sun Supply PV ($1,099), https://sunsuppv.com/product/tesla-gateway-3/).

[18] NYSERDA, "The 120% Rule" (NEC 705.12 load-side connections): https://www.nyserda.ny.gov/-/media/Project/Nyserda/Files/Publications/Fact-Sheets/NY-Sun-The-120-Rule.pdf

[19] Tesla, "Powerwall 3 Specifications" (note 14)

trust. Long utility interconnection timelines also compete with short submission windows. Therefore, we recommend:

1. **Funding reservations at application**, including before final interconnection approval (conditioned on that approval), with carry-forward to the next program year for projects held up by interconnection, and prompt return of withdrawn funds.

2. **Multi-year budget visibility** (for example, capacity blocks), rolling or longer submission windows, and near-real-time public tracking of funds requested, reserved and remaining.

3. **Customer education support:** program-branded materials explaining backup power (kW) and duration (kWh), with load assessment and system design as eligible costs.

4. **Retrofit priority with protection for new projects:** prioritize storage retrofits of existing ILSFA sites, while reserving a defined share of funds for new solar plus storage projects.

Large Residential (Multifamily) and NP/PF Projects (Question 1.2)

Our position: create a **single incentive tier for large residential and NP/PF projects at up to $1,000/kWh**, with a **200 kWh per-system funding cap** and no separate dollar ceiling, stacking with the utility rebate where eligible ($300/kWh for residential and smaller non-residential customers; $250/kWh for larger customers) and not exceeding net cost.[20,21] Appendix A extends one residential battery to these segments and proposes no multifamily or NP/PF assumptions.

Large residential (multifamily). The statute makes Storage for All available to the low-income large multifamily subprogram (5 or more units). Only 4 large residential projects had been energized by May 2025, averaging about 640 kW AC of solar,[22] so these sites are few but large. Their needs resemble NP/PF more than single-family homes (commercial-scale equipment, often 3-phase service, and critical loads such as elevators, hallway lighting, pumps and community rooms). They should be treated like NP/PF for tier, cap and metering, with two differences: the statute's prevailing wage requirement excludes residential buildings, and tenant benefits should be documented where tenants do not pay for electricity directly.

Typical sizes and costs. Published case studies point to customer-sited NP/PF storage of roughly **55–450 kWh**, many around **100–220 kWh**, so the 200 kWh cap would fully fund most sites.[23]

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[20] ComEd, *Distributed Generation Rebate Terms and Conditions* (2026): https://www.comed.com/cdn/assets/v3/assets/blt3ebb3fed6084be2a/blt2810b689df2e361f/6a19a2f492d70cb21c15fe39/DG-Rebate-Terms-and-Conditions--2026.pdf

[21] Ameren Illinois, Rider CGR – Customer Generation and Storage Rebate (effective October 19, 2026): https://www.ameren.com/-/media/rates/illinois/residential/electric-rates/other-charges/aiel59rdcgr.ashx

[22] ILSFA, *PY2024-2025 Annual Evaluation Report*, Tables 7 and 18 (note 7)

[23] Clean Energy Group (CEG) resilience hubs of about 56 kWh and 220 kWh (Clean Energy Group, *Resilience Hub Fact Sheet* (Dec. 2025): https://www.cleanegroup.org/wp-content/uploads/Resilience-Hub-Fact-Sheet.pdf); community health centers of about 54–448 kWh, including CrescentCare's 220 kWh whole-facility system (Clean Energy Group, *Resilient Emergency Power for Florida Community Health Centers*: https://www.cleanegroup.org/wp-

Systems of 100–500 kWh cost around **$1,000/kWh**.[24] At this scale, cost categories that residential jobs rarely have often outweigh economies of scale: revenue-grade metering; switchgear, service or transformer upgrades; 3-phase interconnection studies; stamped engineering; NFPA 855 fire-code siting; critical-load panels; prevailing wage; and longer permitting and board approvals. All-in cost per kWh can therefore equal or exceed residential costs. Longer interconnection timelines make conditional or carry-forward reservations especially important (Question 2).

Prevailing wage (NP/PF only). ILSFA NP/PF projects submitted after July 3, 2023 that receive a REC contract are "public works" under the Prevailing Wage Act, and the statute applies prevailing wage to the Section 1-56(b) programs, which now include Storage for All, excluding projects serving residential buildings.[25] The electrician total package is **$75.68/hour in Tazewell and Peoria counties** and about **$107–$113/hour in Cook, the Chicago collar counties and Winnebago County**.[26] Fully loaded prevailing wage costs also include certified payroll compliance, overhead and markup, and they will be higher in the Chicago area. The total impact per project is real but modest compared with upgrades, engineering and interconnection. **We ask IPA to clarify** whether storage added to an NP/PF site is public works, especially where the solar was submitted before July 3, 2023.

Further recommendations for large residential and NP/PF:

- **Eligible costs** within the per-kWh cap: the revenue-grade meter and CTs for AC-coupled retrofits, engineering, interconnection studies, NFPA 855 siting and critical-load panels.
- **Switchgear, service and transformer upgrades** funded through coordinated outside programs or by voluntary host contributions, with reservation holds (Question 9).

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content/uploads/Resilient-Emergency-Power-for-Florida-Community-Health-Centers.pdf); and a median paired non-residential system of about 100 kW / 200 kWh in LBNL data (2018–2020 installations, mostly in California) (Clean Energy Group / LBNL webinar slides (Aug. 19, 2021): https://www.cleanegroup.org/wp-content/uploads/RPP-webinar-slides-8-19-21.pdf). Illinois sites may differ, and IPA should check these ranges against data from Illinois Approved Vendors.

[24] Costs reported to California's Self-Generation Incentive Program (SGIP) for non-residential systems, 2018–2020 installs, nominal dollars, in the same LBNL analysis (CEG / LBNL webinar slides (note 23)). Lazard's 2025 analysis reports much higher levelized storage costs for a 1 MW C&I system than for 100 MW utility-scale systems (Energy-Storage.News, "Lazard says US energy storage cost reduction in 2025 offsets prior pandemic-driven increases" (June 19, 2025): https://www.energy-storage.news/lazard-says-us-energy-storage-cost-reduction-in-2025-offsets-prior-pandemic-driven-increases/).

[25] Public Act 103-0188 (Illinois Solar for All, "New Illinois Solar for All Prevailing Wage Requirements and Updated Submission Calendar" (July 6, 2023): https://www.illinoissfa.com/announcements/2023/07/new-illinois-solar-for-all-prevailing-wage-requirements-and-updated-submission-calendar/); 20 ILCS 3855/1-56, as amended by CRGA (note 1). Residential distributed generation projects and projects serving houses of worship that do not exceed 100 kW AC are exempt.

[26] Illinois Department of Labor, Current Prevailing Rates (county schedules posted October 19, 2026): https://labor.illinois.gov/laws-rules/conmed/current-prevailing-rates.html. Electrician rates are unchanged from the September 2026 posting.

- **Prevailing wage** recognized through a regional adder based on documented, fully loaded regional costs or as eligible costs within the per-kWh cap.
- **Voluntary host contributions** toward uncovered costs and capacity beyond 200 kWh.
- **Budget planning:** the 118 NP/PF sites energized by May 2025 alone represent an illustrative $11.8–$23.6 million at the cap, more than the entire $7.6 million. A separate large residential and NP/PF share works only if total funding increases; otherwise that share or the small residential share will be starved.

Sizing limits for Large Residential & NP/PF: limit power and export, not energy

Our position: Storage for All-funded Large Residential and NP/PF battery power (battery inverter nameplate kW) and grid export should each be limited to **150% of the site's 12-month peak demand**, while energy is funded up to the 200 kWh cap and hosts may add more kWh at their own cost, because backup duration is what delivers onsite resilience. Without such limits, the subprogram could finance multi-MW batteries on non-profit or large residential sites that operate mainly as merchant assets in PJM (ComEd territory) or, eventually, MISO (Ameren territory). We do not oppose such projects in general, but they are far beyond onsite needs, and limited Storage for All funds should not subsidize them. The 150% level leaves headroom for load growth (such as electrification and EV charging) and for demand-response and VPP participation.[27] Participation in utility and IPA-approved demand-response and VPP programs should be explicitly allowed within the limit, and planned PJM or MISO wholesale participation should be disclosed (Questions 14 and 15).

Integration with the Illinois Solar for All Program (Questions 3, 3.1 and 3.2)

Question 3 – Always separate applications. Storage applications should **always be kept separate from solar applications**, even for new combined solar plus storage projects. A combined project can submit both at once, linked by ILSFA project ID, with the storage reservation conditioned on the solar project being selected. The customer still receives one coordinated offer and disclosure, but a question or delay on either application never holds up the other.

Question 3.1 – A separate add-on track for existing ILSFA participants.

- **Metering and assessment:** the remote meter (about $1,000 small residential; about $2,000 large residential and NP/PF) should be an eligible cost, and the track should allow a load

[27] Implementation: set the baseline from 12 months of utility interval data (or billing data where interval data is unavailable), with an alternative method for new or recently expanded facilities; enforce the export limit through certified power control system settings, stated in the interconnection application and agreement; and verify compliance annually with utility meter data. Capacity above the limits is not funded, and site export must still stay within the limit.

assessment (typically 27 kWh per home) and a site-specific electrical assessment before final approval (Question 1.2).

- **Electrical upgrades:** funded through coordinated outside programs or voluntary host contributions, with reservation holds (Question 9).
- **System owner consent:** where the household does not own the system, the lessor may need to consent to the retrofit, and the lease may need updating. About 95% of the residential projects energized in program year 2024–25 (June 2024 through May 2025) were leased.[28] Some national lessors already offer add-on batteries under a separate agreement.[29] The Agency should publish a **standard lessor consent and add-on agreement framework**, so that no-cost storage does not change the household's existing lease payment.
- **Priority:** prioritize retrofits, whose customers are enrolled and whose solar savings are established, while reserving a defined share for new solar plus storage projects, which depend on a healthy ILSFA solar pipeline (Question 1).

Question 3.2 – Process design. Storage approval should never delay the solar contract or REC payment timeline. The storage incentive should have its own application, contract and payment track, linked to the ILSFA project ID but never bundled into the REC contract, with storage funds reserved when the application is accepted.

Program Focus (Questions 4 and 5)

Question 4 – Focus areas. We do not recommend specific focus areas beyond **representative statewide access**. Storage delivers resilience and bill-savings value across all eligible subprograms, and limited funds are best spread fairly across the state.

Question 5 – Selection criteria. Use the existing **ILSFA Project Selection Protocol** rather than new criteria. It already balances funding between ComEd and Ameren territories and across regions through Environmental Justice and Energy Sovereignty carve-outs, utility-group scoring, portfolio balancing and NP/PF geographic diversity.[30] Storage paired with new solar would follow the paired project's selection, while its application stays separate (Question 3); retrofits would use each site's existing utility group, region and EJC status. The per-system caps and the

[28] ILSFA, *PY2024-2025 Annual Evaluation Report*, Tables 7 and 18 (note 7)

[29] Sunrun, "Add A Battery": https://www.sunrun.com/add-a-battery (offered to existing Sunrun customers, including in ComEd territory; billed separately from the existing solar).

[30] Illinois Power Agency, *Project Selection Protocol Guidance – Program Year 2026-2027*: https://www.illinoissfa.com/wp-content/uploads/2026/06/2026-2027-Project-Selection-Protocol.pdf. At least 25% of each subprogram's funds are reserved for projects in Environmental Justice Communities and at least 25% for Energy Sovereignty projects (§1.1). Residential projects receive 0–2 points by utility group, Group A being Ameren Illinois, MidAmerican, Mt. Carmel and MISO rural cooperatives and municipal utilities, and Group B being ComEd and PJM rural cooperatives and municipal utilities (Appendix A). A category below 30% of subprogram incentive value is filled from underrepresented projects until it reaches 30% (§2.4). NP/PF projects receive a Geographical Diversity Score across six regions (§1.4.3). Ties are randomly ordered, and unselected projects go to waitlists (§3.1).

NP/PF/Large Residential power and export limit should be **eligibility rules, not scoring criteria**. Because the protocol falls back on random ordering and waitlists when oversubscribed, it reinforces the need for adequate funding and reservations.

Rebate, Grant or Other Incentive Mechanism (Questions 6, 7, 7.1 and 8)

Question 6 – A one-time payment at completion is essential. The incentive (rebate or grant) should be paid **once, to the installer, as close to system completion and energization as possible**, at up to $1,000/kWh within the 27 kWh and 200 kWh per-system funding caps, stacking with the ~$300/kWh utility rebate and not exceeding eligible net cost.

- **Why timing matters:** under a no-cost model, **the installer finances the entire system until it is paid**. Every week of delay is a direct financing cost and limits how many projects a contractor can carry.
- **No REC adders.** Storage does not generate RECs, and a multi-year payment stream would push years of financing cost onto installers, which the program would ultimately pay.
- **Always separate from solar,** even when installed together (Question 3).
- **Paying quickly:** trigger payment at energization/PTO on a simple completion package (photos, commissioning report, PTO or interconnection approval, warranty and monitoring enrollment, invoice), with **no partial or milestone payments**; pay within a firm timeline (e.g., **30 days**) with online status tracking; reserve funds at application approval; time the Storage for All and utility rebate payments to arrive together; and use post-payment audits, spot inspections and clawback rather than pre-payment inspection delays.
- **Per-kWh cap and eligible costs:** a per-kWh cap pays only for storage actually installed and scales fairly from a 27 kWh home to a 200 kWh community center. The remote meter and the required warranty should be eligible costs within the cap; electrical upgrades should be funded outside (Question 9). The combined ~$1,300/kWh covers typical retrofit costs: about $1,162/kWh at 27 kWh and $1,199/kWh at 13.5 kWh at IPA's own costs.

Require a third-party long-term warranty with active monitoring for every system, as an eligible cost. It should be issued by a party independent of the installer, cover at least the system's expected life, include monitoring with a named party responsible for responding to alerts, and remain with the property. [REDACTED – CONFIDENTIAL] The reasons:

- **The households served cannot absorb a failure.** The Powerwall 3, like most residential batteries, carries a 10-year manufacturer warranty,[31] far shorter than a typical 20- to 25-year solar lease.
- **Battery management must be done right.** Reserve settings, operating modes, rate changes, firmware updates and VPP dispatch all affect whether a household sees backup and savings, and problems are often invisible until the next outage. Active monitoring by a third party like Solar Insure catches them early and supports performance reporting (Question 10).

[31] Tesla, "Powerwall 3 Specifications" (note 14)

- **Installers and lessors may not last as long as the batteries.** Sunnova filed for bankruptcy in June 2025, and its customers' systems moved to a new servicer.[32] A third-party, insurer-backed warranty like Solar Insure offers peace-of-mind ownership to all Storage for All participants.
- **Such warranties exist today,** for example Solar Insure's SI-30 Battery,[33] Align Solar Protection,[34] and Omnidian.[35]

Question 7 – Yes, storage may be dropped. A common cause is an electrical upgrade or other adder the utility (Ameren) requires during interconnection approval, which makes storage infeasible while the solar can proceed. Others include a customer changing their mind or fire-code siting conditions that cannot be met.

Question 7.1 – Keep the incentives completely separate. Failure to complete the storage should **never put the solar incentive at risk**; the solar continues under its ILSFA REC contract unchanged. The only consequence should be that **no Storage for All incentive is paid**, with reserved funds returned to the pool, and no other penalties, collateral forfeiture, solar contract amendments, or negative Approved Vendor scoring or compliance marks.

Question 8 – Opportunities and challenges. A single payment at completion keeps financing costs low, keeps storage out of the solar REC contract, and lets more contractors participate, especially small and local firms with limited capital. It needs a clear completion package and clawback terms if a system is removed early, both manageable through post-payment audit. A REC adder would tie up installer capital for years and entangle storage with solar; we do not

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[32] Solar Power World, "Acquisitions now complete: SunStrong in charge of legacy Sunnova systems" (Sept. 2025): https://www.solarpowerworldonline.com/2025/09/acquisitions-now-complete-sunstrong-in-charge-of-legacy-sunnova-systems/

[33] It covers parts and labor for 30 years for new and retrofit batteries, including the integrated inverter of units such as the Powerwall 3, with one battery replacement once capacity falls below 50% after the manufacturer warranty ends. It has no deductible or subscription fee, is backed against manufacturer and installer default by an A.M. Best A+ rated insurer, and transfers with the property (Solar Insure, "SI-30 Battery": https://www.solarinsure.com/si30battery). Its terms require the system to keep its internet connection and monitoring permissions; its portal prioritizes alerts and notifies the certified installer, who is reimbursed for covered work, and Solar Insure arranges a new service provider if the installer goes out of business (Solar Insure, SI-30 Terms and Conditions (Rev. 02, January 2026; internet connectivity and monitoring permissions), https://www.solarinsure.com/wp-content/uploads/2026/01/SI-30-Solar-TCs_Rev02_202601.pdf ; "The Daybreak Portal," https://www.solarinsure.com/daybreak-monitoring ; "Solar Insure Platform," https://www.solarinsure.com/solar-insure-platform ; "13 Reddit Questions about Solar Insure" (replacement service providers), https://www.solarinsure.com/13-reddit-questions-about-solar-insure). Exclusions include workmanship, fire, theft and acts of God, so installer workmanship warranties are still needed.

[34] Align Solar Protection, "Homeowner Information – Currently Considering Solar": https://alignsolarprotection.com/homeowner-considering (insurer-backed protection plans for new residential solar installations, including 25-year battery protection options covering labor, service calls and diagnostics, and protection if the installer goes out of business).

[35] Omnidian, "Home Battery Customer Care": https://www.omnidian.com/solutions/solar-performance-assurance-residential-installers-epcs-developers/home-battery-customer-care/ (a battery monitoring and customer-care service offered through installers: remote issue detection, diagnosis and resolution, quarterly battery health reports and live customer support; it is not a warranty).

consider it workable. Any mechanism also needs funding certainty: reservations at acceptance, a firm payment timeline, and quick return of withdrawn funds to the next project in the queue.

Ensuring No Upfront Costs and Understanding Customer Benefits (Questions 9–13.1)

Question 9 – No upfront costs. We support storage that is **no-cost by default for income-qualified households**, consistent with the RFI and ILSFA's no-upfront-cost approach. That requires:

- **Incentives that cover storage cost.** The combined ~$1,300/kWh fully covers a typical 27 kWh retrofit at IPA's own installed cost; IPA's ~$10,000 assumption would not achieve no-cost retrofits.
- **Closing any gap without a required payment.** No-cost by default means the incentive must cover the full cost. Where it falls short, only two outcomes are consistent with that principle: the program provides more funding, or the household, as system owner, chooses to cover the difference as a voluntary contribution under the safeguards in Question 11. Where the household does not own the system, the lessor's consent may be needed (Question 3.1). A contribution must never be a condition of participation, and a fully covered configuration within the program caps always remains available.
- **Electrical upgrades funded outside Storage for All** (about $3.4 million across the 1,494 built small residential homes alone), through coordinated programs where available, such as weatherization (IHWAP), utility electrification and low-income programs, and home repair programs, none of which should be assumed to have funds for every project. IPA should coordinate referrals, allow voluntary host contributions where outside funding falls short, and let projects **hold their reservation** for up to 24 months while upgrade funding is arranged.
- **Payment timing:** the Agency should consider who receives the utility rebate and when, because timing gaps create financing costs that pressure the no-cost offer.

Question 10 – Identifying and prioritizing benefits. We urge caution. **Storage benefits are much harder to model than solar production.** A storage projection carries every solar variable plus battery state of charge, reserve setting, operating mode, the customer's rate (including time-of-use, hourly and low-income discount rates), the household's load profile, round-trip efficiency, supply-only net metering, VPP dispatch and degradation; backup also depends on outage timing, season, loads and the charge level when the outage begins.[36] Research confirms wide variation: holding capacity in reserve for backup usually costs more in forgone bill savings than it adds in reliability value, rate design largely determines savings, underused batteries can increase bills,

[36] NREL assumes about 85% round-trip efficiency (NREL (now the National Laboratory of the Rockies), 2025 Annual Technology Baseline, Residential Battery Storage: https://atb.nlr.gov/electricity/2025/residential_battery_storage). Relevant rates include DS-1 flat rates, Ameren Power Smart Pricing and ComEd Hourly Pricing. Supply-only net metering applies to systems interconnected after 2024.

and 10 kWh of storage meets only about 86% of critical load, on average, in long-duration outages once heating and cooling are included.[37] We recommend:

- **Lead with resilience**, valued qualitatively: backup for medical devices, refrigeration, heating controls and communications, and continued operation of NP/PF facilities during outages. Assume small energy bill savings unless a utility program contract guarantees them.
- **Standardized, conservative disclosures:** ranges rather than point estimates, no guaranteed savings, a common Agency methodology, plain-language backup scenarios ("essentials only" versus "whole home," summer versus winter), consumer-protection review of savings and backup claims, and Agency-approved education materials.
- **Measurement** using the monitoring data the required warranty already collects (Question 6): energy burden (modeled and actual bill savings), household reliability (backup hours and outage minutes avoided) and community resilience (NP/PF operating hours maintained during outages).

Questions 11 and 11.1 – Protecting the 50% savings requirement. Of the residential projects energized in program year 2024–25 (June 2024 through May 2025), 1,419 (about 95%) were leases, 62 were PPAs and 17 were purchases, and 95% of the leases had $0 payments.[38] The storage incentive plus the utility rebate should therefore cover the storage cost, and electrical upgrades should be funded separately, so that lease payments do not rise and the 50% savings calculation is unaffected; any storage savings then come on top. Savings projections should not count on arbitrage or VPP revenue, which in our experience are modest (Question 13).

We recommend allowing optional voluntary contributions from the battery host, so that limited funds reach more households and fewer projects are lost:

1. **Voluntary upsizing** allowed beyond the funded size (27 kWh small residential; 200 kWh large residential and NP/PF), such as an expansion unit or second battery;

2. **Electrical upgrades** that coordinated outside programs do not cover (Question 9); and

3. **A gap-closing payment** where costs exceed the incentive plus rebate, up to a reasonable limit set by the Agency, rather than have storage dropped.

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[37] Berkeley Lab, *Bill Savings vs. Backup Power* (2024): https://emp.lbl.gov/publications/bill-savings-vs-backup-power ; Berkeley Lab, *Implications of Rate Design for the Customer-Economics of Behind-the-Meter Storage* (2019): https://doi.org/10.2172/1559242. California's SGIP evaluation found that **solar-paired residential batteries saved about $12 per kWh of capacity per year**, while underused or backup-only systems increased bills by about $1 per kWh of capacity, and batteries charging from the grid overnight increased emissions (CPUC, *2023 SGIP Impact Evaluation* (Verdant Associates): https://webproda.cpuc.ca.gov/-/media/cpuc-website/divisions/energy-division/documents/self-generation-incentive-program/2023_sgip_impact_evaluation.pdf). Gorman et al., "County-level assessment of behind-the-meter solar and storage to mitigate long duration power interruptions for residential customers" (Berkeley Lab, 2023): https://emp.lbl.gov/publications/county-level-assessment-behind-meter.

[38] ILSFA, *PY2024-2025 Annual Evaluation Report*, Tables 7 and 18 (note 7)

Each contribution must meet three safeguards: (a) the household still meets the 50% savings requirement with the contribution included; (b) it receives clear written disclosure of the contribution, what it pays for and the no-cost alternative; and (c) the no-cost option always remains available, with no pressure and no effect on project prioritization.

Question 12 – Cost data. [REDACTED – CONFIDENTIAL: Company installed cost and pricing data provided in the confidential version.] Cost corrections based on the Agency's own figures appear in Question 1.2.

Question 13 – Ongoing customer benefits. 360 Electric's storage customers are largely in Ameren Illinois territory:

- **Backup and resilience:** our customers typically ride through grid outages of 3–5 hours without problems, mostly on 27 kWh systems. This is storage's clearest benefit: keeping power to medical devices, refrigeration, sump pumps and heating controls protects a household's health, food and home, even though it does not appear on a bill.
- **Energy arbitrage:** the best result we have seen, roughly **$0.04/kWh**, came from one highly engaged customer on Ameren's DS-1 rates who manages his Powerwall 3 daily as a hobby. It is an **upper-bound outlier**; typical income-qualified households will not manage their batteries this actively, and therefore will not experience this much added savings from storage.
- **Demand response and VPP:** none of our customers have yet participated. The utilities' Scheduled Dispatch VPPs pay a very modest $10/kW per summer season, and Appendix A's own estimate is only about $270 over five years. VPP revenue cannot meaningfully close funding gaps, and because it arrives gradually over many years, it cannot offset upfront installation costs (Question 15).

We recommend conservative assumptions for bill savings, arbitrage and VPP revenue, and explicit recognition of resilience in program goals and reporting, such as outage hours ridden through and critical loads supported.

Question 13.1 – LIDR effect. A low-income discount rate lowers the cost of grid electricity, which can reduce the bill savings available from storage. For these customers, reliability and resilience are a larger share of storage's value, and the Agency should not judge storage value for LIDR customers on bill savings alone.

Avoiding Double Counting of Incentives (Questions 14 and 15)

Question 14 – Avoiding double counting. Require an **itemized disclosure** of all incentives and contributions for each project: ILSFA REC payments, the utility storage rebate, VPP enrollment, outside program funds and any voluntary host contribution. Size the Storage for All incentive against the *storage-specific* net cost, so that solar costs paid through RECs are not counted again and no cost is reimbursed twice by the rebate, Storage for All or outside upgrade programs.

NP/PF applicants should disclose demand-response, VPP and planned PJM or MISO wholesale participation, which should be disclosed but should not reduce the incentive; funding is bounded by the 200 kWh cap and the 150% power and export limit.

Question 15 – Other funding sources. Assume only sources that are available today, can be documented, and are the same across utility territories: in practice, **the utility storage rebate only**.

- **Utility storage rebate:** $300/kWh for residential and smaller non-residential customers (per Appendix A) and $250/kWh for larger customers.[39,40] Since CRGA, storage rebated on or after June 1, 2026 must enroll in the utility's Scheduled Dispatch VPP, and Ameren's $300/kWh paired-storage rebate is set only through December 31, 2029, so a program starting in 2028 or later should revisit this assumption.[41]
- **Potential VPP revenue should not be included in the Agency's incentive assumptions.** We recommend removing the ~$270 VPP estimate from Appendix A's offsets entirely. VPP revenue is very modest at best, and it is speculative and in the future: the Scheduled Dispatch VPPs pay $10/kW per summer season, Ameren's program launch date had not been announced as of September 2026, and the broader VPP framework CRGA requires need only begin by December 31, 2028.[42] Any VPP payments a household or host receives should benefit them rather than offset the incentive.
- **Wholesale revenue differs by grid operator.** In ComEd's PJM territory, aggregated customer batteries may earn capacity, energy and regulation revenue starting in 2028, and large C&I batteries already do; in Ameren's MISO territory, distributed-resource aggregations are not expected to take part in MISO markets until 2030.[43] The Agency should size the incentive

[39] ComEd, *DG Rebate Terms and Conditions* (2026) (note 20)

[40] Ameren Illinois, Rider CGR (note 21)

[41] ComEd, *DG Rebate Terms and Conditions* (2026) (note 20); Ameren Illinois, Rider SD VPP – Scheduled Dispatch Virtual Power Plant: https://www.ameren.com/-/media/rates/illinois/residential/electric-rates/other-charges/aiel68rdsdvpp.ashx; Ameren Illinois, Rider CGR (note 21). The Ameren value from 2030 is still to be determined. The Agency should also check whether rebate and VPP terms apply to larger NP/PF systems in the same way.

[42] Payment is based on average output during weekday dispatch hours, and rebated customers must take service no later than March 1, 2027 (Ameren Illinois, Rider SD VPP (note 41); Citizens Utility Board blog (Sept. 14, 2026), CRGA programs: https://www.citizensutilityboard.org/blog/2026/09/14/upcoming-crga-programs/).

[43] PJM opens capacity participation to distributed-resource aggregations from the 2028/2029 delivery year, and energy and ancillary-services participation on February 1, 2028 (FERC, Order on Compliance Filing, PJM Interconnection, L.L.C., Docket No. ER22-962-007 (May 1, 2025): https://www.pjm.com/pjmfiles/directory/etariff/FercOrders/8128/20250501-er22-962-007.pdf). Customers on hourly pricing can also lower capacity charges by discharging during summer system peaks. Large C&I batteries in ComEd territory (for example, 1 MW / 4 MWh) already earn PJM demand-response, regulation and capacity revenue because they meet PJM's 100 kW minimum and have their own metering and telemetry; residential and small NP/PF systems are too small to do so individually. Larger NP/PF batteries (roughly 100 kW or more of dispatchable capacity, typically 100 kWh or more of storage), especially in PJM, may earn some revenue today, directly or through a curtailment service provider. For MISO, see RTO Insider, FERC approves 2030 finish date for MISO Order 2222

without counting VPP, wholesale, regulation or capacity-charge revenue, so that MISO-territory projects receive the full incentive needed to stay no-cost and no territory is disadvantaged; allow, but not require, participation within the 150% power and export limit; and direct any such revenue to the household or NP/PF host, never as a condition of the no-cost offer.

- **Other sources:** do not assume federal tax credits, USDA REAP grants, federal Solar for All funds, or other state financing programs, given their uncertain availability by the program's likely 2028 or later start. Where such sources become available to a project, they should be disclosed (Question 14) and may reduce what a host contributes.

Conclusion

360 Electric supports the Storage for All program. About $7.6 million is far from enough to establish it, and taking that money from ILSFA solar subprograms that are already oversubscribed would harm both programs; without ILSFA solar, there is no Storage for All. We respectfully ask the Agency to fund the program adequately, base incentives on realistic retrofit costs and a typical 27 kWh system, keep storage no-cost by default and fully separate from solar with a one-time payment at completion, and protect households with conservative savings expectations and a long-term monitored warranty. Our specific recommendations are summarized in the Executive Summary.

Thank you for the opportunity to comment. We would welcome follow-up discussion.

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compliance (Jan. 16, 2025): https://www.rtoinsider.com/95916-ferc-finish-date-miso-order-2222-compliance/; we know of no comparable compensation there for residential or small commercial batteries today.