Robert Keen's Comments on Use of Standard Offer Compensation for NRES and SCEF Successors Docket 26-06-04, August 3, 2026

PURA should not focus on briefs to analyze legal document conflicts…

But should instead be putting the customer first and designing an affordable, equitable program using the lowest cost solar resources (grid scale)…..

and then asking the legislature to modify any conflicting legislation.

There is plenty of time for the legislature to make changes next spring before the present program ends December 2027. UI made a similar comment to the legislature…wait until the PURA process ends then pass any needed legislation in 2027.

The proposed net metered solar program is not acceptable:

1. It creates large cost shifts or public benefits charges (in addition to those created by the existing solar programs) which will double (at least) over the 20 year contracts as illustrated by the attached figure.
2. It is not equitable. Giving community solar to a small percentage of low income creates more burdens for the non solar low income…and the rest of us.
3. It relies on a calculating the value of distributed energy resources (DES) to justify net metered rooftop solar that costs 2-4 times grid scale solar. DES is fraught with uncertainty and other problems as noted in OCC comments of 8-21-2019. OCC makes the same point as I've been making: solar should be done at grid scale as it costs less and has more benefits:
    a. Regulatory bodies favor competitive solutions because a value study will likely not provide significant assistance with the more frequent determination that one needs to make, that is, the level of subsidization or compensation that should occur *below* the determined value. Value studies result in over subsidization which occurs with net metered customer solar.
    b. OCC notes that we should do a comparative study comparing large scale wind and solar to DER resources (page 12). "*For example a 5MW solar field directly connected to the distribution system has nearly all the same benefits as rooftop solar, plus additional benefits if it is a system with trackers that allow the system to follow the sun…yielding a higher capacity value. Moreover front of the meter resources can be geotargeted to the highest value grid locations…."*
    c. DERs should be on a level playing field so as to not disadvantage the lowest cost clear resources. (page 13). "Why should I bid my solar field into the grid when I can sell it to community solar for twice the price?"
    d. There are massive uncertainties in the future markets which make DRIPE forecasts unpredictable especially for 20 years. It's " *akin to changing the oil on a car while driving down the highway*".

e. "*Moving too far into a valuation paradigm could quickly find utilities or industries justifying all sorts of investments based on inflated claims of value."* (page 4) I agree.

Standard Offer Pricing

Pricing of excess solar based on the standard offer is too high (2 times California). The concept of adjusting only the excess buy back rate also ignores that the solar customer is exempt from paying for many costs.

1. Standard offer pricing compares apples to oranges. The standard offer is risk managed, full requirements service 24/7 worth 10-16 c/kWh while the solar output is variable, at the least expensive hours and worth <5 c/kWh.
2. It ignores the cost shift: that the net-metered solar customer does not pay for transmission, distribution, public benefits, nor full requirements generation at the expensive hours.
3. Ignores that the cost shift items in 2) will greatly increase over time as shown the attached figure. Escalation of the cost shift/public benefits charge over the 20 year contract has become a major problem in California increasing from $3.4 B to $8.5B per year in 3 years. Expect to see major increases in cost shift/public benefits charges in Connecticut due to:
    a. Increases in the distribution charges.
    b. $16-27B increase in transmission to bring the NetZero offshore and onshore wind to the load centers
    c. Increases in public benefits due to the offshore wind costing more than the market. If you thought the 4.99 c/kWh Millstone contract was expensive, wait until you see the effect of the 10-20+ c/kWh offshore wind contracts….and the batteries for back-up.
    d. At a 3.5%/year annual increase the public benefits would double the annual PBC charge in 20 years.

California reduced the buyback rate for new solar contracts from 32 to 8 c/kWh yet the cost shift continues to grow as the solar customers are also exempted from increases in costs as noted in the attached LATimes article (Augusts 2025). Leading consumer advocate agencies were proposing to reduce the buyback rate further to 76-82% of what they were receiving. "The NRDC is reported to be on board in large part due to the equity issues".

" The evidence is clear that currently NEM has a large impact on rates that is mostly borne by renters, lower income customers, and inland customers", NRDC.

I believe the further reduction in benefits was not implemented because it involved breaking the 20yr solar contract.

We also will regret signing 20 year contracts that exempt the solar customers from the transmission, distribution, public benefits and expensive-hour generation backup costs.

Affordability:
Solar generation should be priced based on competition with other solar generation including grid scale generation which costs ½ to ¼ of customer net-metered generation a point I have made many times in 3 submittals on the solar successor docket.

To avoid the cost shift, a buy-all contract should be used for all solar in which the customer pays the normal(non-solar) transmission, distribution, public benefits, and standard service. All solar generation should be credited at the local marginal energy and capacity prices.

Thank you for the opportunity to comment.

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Attachments
1. Sketch showing the increase in public benefits (cost shift) over 20 years added on top of the existing solar programs.
2. OCC comments of the problems with "value of DERs" creating bad investments due to overstatement of value and avoiding less costly ways such as grid scale solar.
3. LATimes article critical of net metering solar costs escalating over the 20 year contract and the inequities of net metered solar. When net metered solar has lost the LATimes and the NRDC, it's lost the game.