STATE OF CONNECTICUT
PUBLIC UTILITIES REGULATORY AUTHORITY

RE:	**IMPLEMENTATION OF CLEAN ENERGY SUCCESSOR PROGRAMS**	**:**	**DOCKET NO. 26-06-04**
		:	
		:	
		:	**AUGUST 26, 2026**

I. INTRODUCTION

The Office of Consumer Counsel ("OCC") respectfully submits these written comments[1] in response to the Notice of Request for Written Comments issued in the above-captioned docket by the Public Utilities Regulatory Authority ("PURA" or "Authority") on August 12, 2026. OCC offers the following preliminary comments for the Authority's consideration at the beginning of this proceeding. OCC continues to gather data and information to better understand the issues and develop recommendations for PURA. OCC looks forward to providing more detailed suggestions and analysis as the record in the docket develops. OCC recommends PURA establish technical conferences to discuss specific issues among stakeholders.

OCC supports customer adoption of cost-effective solar and storage technologies to reduce electricity costs and customer bills and appreciates this opportunity to improve upon the current program designs in successor solar programs. One of OCC's key priorities is to redesign programs so that they result in net benefits for all customers. OCC believes that benefit-cost

[1] These comments were prepared with substantial assistance from Synapse, OCC's consultant in this proceeding.

analysis ("BCA") and rate and bill analysis ("RBA") can be used to achieve this key goal and should be used to answer many of the questions that need to be addressed in this docket.

II. SUMMARY RECOMMENDATIONS ON TIME-DIFFERENTIATED RATES

Three definitions might be helpful in keeping track of the concepts described here:

- **Net Metering.** When solar customers are credited on a kWh basis for energy exported to the grid, such that their kWh exports reduce their billed kWh consumption. This term applies to the current RRES Netting program.
- **Net Billing**. When solar customers are credited on a monetary basis for energy exported to the grid, such that they receive a financial bill credit for their exports that is netted against their balance owed for gross consumption. This term applies to the current NRES program, for customers greater than 200 kW.
- **Instantaneous Billing.** When net billing customers' exports are measured and their financial value calculated on an hourly or more granular basis, as opposed to on a monthly basis.

Table 1 presents a summary of OCC's recommendations regarding where and how to apply time-differentiated rates. The table indicates how the recommendations evolve depending on whether customers have access to sufficient metering capability and updated time-varying rates ("TVR"). The notes following the table and the discussion below provide explanations for the recommendations.

Table 1. Summary Recommendations on Time-differentiated Rates

Equipment	Component of Compensation	With Simple Meters And Current TVRs	With Sufficient Metering Capabilities	With Updated TVRs
PV Only	TVR	No Current rates out of date	No Current rates out of date	Yes
	Netting exports	Monthly, Time-diff not possible Flat proxy sufficient	Hourly, Instantaneous netting with Time-diff rates	-
	Buy-All purchases	Flat proxy sufficient	Flat proxy sufficient	-
	SCEF purchases	Flat proxy sufficient	Flat proxy sufficient	-
PV Plus Storage	TVR	No Current rates out of date	No Current rates out of date	Yes Necessary for storage
	Netting exports	Flat proxy will not work, Time-diff not possible	Instantaneous netting with Time-diff rates Necessary for storage	-
	Buy-All purchases	Flat proxy sufficient	Flat proxy sufficient	-

	SCEF purchases	Flat proxy sufficient	Flat proxy sufficient	-

The information in the table and these notes apply to the RRES, NRES, and SCEF programs.

TVRs provide customer incentives (i.e., compensation) that are additive to the compensation provided by Netting exports, Buy-All purchases, or SCEF purchases. The compensation from these three programs is mutually exclusive, depending upon which program a customer enrolls in.

TVRs and Netting export compensation rates should be time-differentiated to serve two purposes: (a) they promote customer equity by charging customers the hourly value of what it costs to serve them, and (b) they promote efficiency by providing customers incentives to consume during the lowest cost hours.

TVRs must be designed to recover all allowed revenue requirements. In other words, they are a time-differentiated restructuring of retail rates. Netting export compensation rates, Buy-All, and SCEF purchase rates, on the other hand, should be designed to pay for the value of the services provided. These should be set to reflect hourly avoided costs at the most, which vary based on the hour of the generation. To the extent they can be set below avoided costs, they will increase the net benefits that flow to all customers.

The compensation rates for Buy-All and SCEF purchases can be flat because they apply to solar generation profiles that are unaffected by behind-the-meter consumption. To promote equity, the flat rates should reflect the value of the generation during the hours in which it is provided. This can be done by setting the flat rates to equal the weighted average of the hourly value of

generation, i.e., hourly avoided cost, based on the generation profile of solar resources in Connecticut from a chosen weather year.[2] In contrast, the compensation rates for netting purchases must be time-differentiated because each customer's unique consumption profile changes the shape of their exports. Therefore, compensating netting exports under a flat rate should be phased out once time-differentiated rates become possible.

The current TVRs include a window of 12:00pm to 8:00pm, when customers are charged higher prices based on higher cost electricity. However, the generation peak period in New England has shifted in recent years to evening hours and is expected to continue to shift to later hours as more solar resources are installed over time. Due to this shift in peak periods, it would be best to wait for updated TVRs before applying them to Netting customers, especially Netting customers that install storage.

Storage charging and discharging is typically not metered separately from PV generation. Instead, the storage operation affects consumption behind the meter, and the customer compensation comes from charging in low-cost hours and discharging in high-cost hours. This means that when a customer installs storage, it is especially important that they be on an updated TVR and a time-differentiated Netting tariff.

[2] Alternatively, Buy-All and SCEF purchase rates can be set to reflect the actual value in each hour. This results in increased complexity without commensurate benefit.

III. NRES AND SCEF SUCCESSOR PROGRAMS

A. Netting versus Buy-All Tariffs

Public Act No. 26-127 §§ 2(a) requires each EDC to offer both Netting and Buy-All tariffs for non-residential customers.[3]

A redesigned Netting tariff might be able to provide more cost-effective incentives for non-residential customers to install solar. Further, a Netting tariff might be the simplest and most cost-effective way to provide incentives for solar customers to install storage.

NRES - Netting

OCC recommends that NRES Netting energy exports continue to be compensated at a flat rate under current metering capabilities. Flat rates can be estimated to approximate the hourly value provided by the solar generation. This can be done by calculating the weighted average of the hourly value of generation, i.e., hourly avoided cost, based on the generation profile of solar resources in Connecticut from a chosen weather year. Flat rates calculated this way can be used regardless of whether the NRES compensation rates are based on competitive bids or are administratively set.

OCC also recommends that PURA adopt instantaneous netting for determining NRES energy export compensation, for those customers that have the metering capability. Instantaneous netting provides a more accurate indication of the magnitude of energy exports from solar. Once instantaneous netting is applied, time-differentiated energy export rates can be applied as well to

[3] The PURA Legislative Report, however, recommends that the NRES successor program should offer only the Buy-All tariff for simplicity because to date the majority of NRES customers have chosen the Buy-All over the Netting tariff Public Utilities Regulatory Authority, Legislative Report, Docket No. 25-02-14, *Renewable Energy Tariff Programs Successor Study*, February 27, 2026 (PURA Legislative Report), page 65.

provide compensation rates that most accurately reflect the hourly value of the solar generation. This becomes especially important for encouraging customers to install storage.

OCC further recommends that PURA apply TVRs for the NRES Netting tariff, for those customers that have the metering capability. TVRs would provide solar customers with compensation during the solar generation hours that more accurately reflects the benefits they are providing to the system in those hours, thereby mitigating any over or underpayment for the generation. The TVRs should be a requirement of enrolling in the NRES program, for those customers that have the metering capability.[4] TVRs should be implemented as soon as practical following any future generic TVR docket and/or future rate cases that establish TVRs.[5]

NRES - Buy-All

OCC recommends that the Buy-All tariff requires the customers to have TVRs, for those that have the metering capability. This will generally encourage efficient customer consumption patterns. TVRs should be implemented as soon as practical following any future generic TVR or future rate cases that establish TVRs.

OCC recommends, however, that the payments made for Buy-All tariffs be based on a flat rate. A flat compensation rate is more practical because it is easier for the utility to implement and the customer to understand. Flat rates can be estimated to approximate the hourly value provided by the solar generation.

[4] for net metering customers are increasingly required in leading net energy metering states. California, Hawaii, New York, Arizona, and North Carolina all require TVRs. PURA Legislative Report, pages 28-29.

[5] Public Act No. 25-173, § 20(a) directs the EDCs to apply to the PURA to implement TVRs for residential, commercial and industrial customers no later than October 1, 2027.

SCEF

The SCEF program is similar to the NRES Buy-All program in that the solar generation is provided directly to the grid and does not affect the participating customers consumption levels. In the case of SCEF, TVRs affect the participating customers (the subscribers), while the generation compensation rates primarily affect the SCEF developer.

OCC does not recommend time-differentiated generation rates for the SCEF developer. Regardless of whether the SCEF resources are procured through competitive solicitations or standard offers, flat compensation rates are simpler to implement for both the utility and the developers. Flat rates can be estimated to approximate the hourly value provided by the solar generation. A time-differentiated rate would not affect the timing of the solar generation.

OCC recommends that PURA apply TVRs for the SCEF program participants, for those customers that have the metering capability. This will generally encourage efficient customer consumption patterns. The application for the SCEF program provides an opportunity to sign up customers for TVRs. TVRs should be implemented as soon as practical following any future generic TVR docket or future rate cases that establish TVRs.

B. How Granular Should Time-Differentiated Rates Be?

As noted above, flat rates can be calculated to approximate time-differentiated rates, by calculating the average hourly value over the hours when solar is expected to operate in Connecticut. This can represent a reasonable proxy of time-differentiated rates for the purpose of setting Netting export rates, Buy-All generation compensation rates, and SCEF generation compensation rates.

The granularity of time-differentiated rates is much more important for setting TVRs. OCC does not offer a specific recommendation at this time on how granular the TVRs should be. There are many inter-related considerations that need to be addressed before answering this question. Generally, we support reflecting temporal system value informed by avoided-cost analysis while preserving simplicity to extent possible.

If seasonal rates are applied to any of the solar programs, it will be important to consider the implications of netting across seasons. In particular, the implications of customers rolling over credits from winter seasons to summer seasons or vice versa.

C. How Could Collocated Energy Storage Respond to Time-Differentiated Price Signals?

OCC recognizes the importance of providing incentives for customers to install and operate storage to help reduce system costs and optimize the value of solar generation. However, storage technologies remain expensive, and analysis provided in the PURA Legislative Report indicates that adding storage to the solar programs as both are currently designed might result in increased rates.[6] Therefore, OCC recommends that further analyses be conducted in this docket to indicate whether and how storage can be integrated into the successor solar programs in a way that is cost-effective and provides net benefits for all customers.

Some form of time-differentiated rates is essential for storage customers because the primary value of storage comes from charging during low-cost hours and discharging during high-cost

[6] PURA Legislative Report, pages 42-44. The analysis estimated that successor RRES programs with reduced export compensation would likely lead to reduced rates, but the same programs with storage added would likely lead to increased rates. Note that this analysis used the rate impact measure (RIM) test, which only indicates whether rates will go up or down. It does not indicate whether a program is cost-effective, nor does it say much about the extent to which rates might go up or down.

hours. Other states are increasingly using TVRs to encourage solar customers to adopt storage technologies.[7]

As noted elsewhere in these comments, OCC recommends that PURA apply TVRs for the NRES, RRES, and SCEF programs, for those customers that have the metering capability, and as the TVRs become updated through other PURA dockets. TVRs will provide solar customers with incentives to optimize their consumption patterns. They will also provide solar customers incentive to install storage technologies to further reduce their electricity costs.

PURA should consider whether and how storage incentives under the NRES program interrelate with other programs that encourage battery adoption, including the Energy Storage Solutions program (and predecessor Connected Solutions program). Customers should be provided with consistent compensation and incentives across all programs that provide similar grid services. For all programs, PURA should balance the need to develop the storage market without overcompensating customers with ratepayer funded program incentives.

D. Metering Requirements

OCC supports the transition from monthly to instantaneous netting, which better reflects real-time system conditions and reduces peak cost shifting. While conceptually sound, OCC remains concerned about Advanced Metering Infrastructure ("AMI") readiness and uneven deployment across service territories.

Generally, OCC recommends PURA consider transitional or hybrid approaches until enabling metering infrastructure is uniformly available. For NRES customers with more advanced

[7] Brattle, *Review of Net Energy Metering Policy in the U.S. and Canada: Jurisdictional Scan*, prepared for New Brunswick Power, May 24.

metering already available, this could mean they can start their program participation with instantaneous netting. Once metering is uniformly available, PURA should consider implementing instantaneous netting more broadly.

E. How to Evaluate Projects' Contribution Toward the Annual Program Budget Cap?

Public Act No. 26-127 § 4(a) establishes a target aggregate program budget cap of $85 million per year, which includes energy compensation, renewable energy certificates, and other energy products for RRES, NRES, and Community Solar. It also establishes a MW cap of 180 MW per year.

OCC supports budget-based cap structures for the successor programs, as they provide clearer and more predictable cost controls than fixed megawatt limits, and can help drive more cost-effective projects. Budget caps improve cost predictability and can adjust naturally to market conditions, but OCC recommends enhanced reporting on cost per MW and program efficiency to ensure transparency.

OCC recommends that PURA use BCAs and RBAs to inform the target allocation across programs. Higher targets can be applied for those programs that are more cost-effective and have better rate impacts.

Further, PURA could consider adopting threshold triggers to monitor progress towards the cap. For example, reaching 80% of the annual budget could trigger a pause of new project solicitations and a review proceeding to determine whether to exercise the 5% adjustment authority under § 4(c) of Public Act 26-127. When looking at future years, PURA could establish forward accounting of future payment obligations from all active PPAs to have visibility of the remaining budget for new commitments after accounting for legacy obligations.

IV. RRES SUCCESSOR PROGRAM

A. Should PURA Implement Time-Differentiated Compensation Rates in the Successor to the RRES Program?

Netting versus Buy-All Tariffs

Public Act No. 26-127 §§ 1(b) requires each EDC to continue to offer both Netting and Buy-All tariffs for residential customers.[8] Buy-All programs can potentially result in less cost-shifting from solar program participants to non-participants because they do not result in lost revenues that need to be recovered in rates. This is a critical issue that should be investigated in this docket using BCAs and RBAs. Further, while RRES customers have expressed a strong preference for the Netting tariff, NRES customers have expressed a clear preference for the Buy-All tariff.[9] OCC recommends that these different preferences be investigated further in redesigning the RRES Netting and Buy-All tariffs.

RRES - Netting

OCC recommends that Netting energy exports be compensated at a flat rate that is lower than the retail rate under current metering capabilities. The flat rates should be equal to or less than the hourly value provided by the solar generation. When the export rate is less than the hourly value of the generation, the net benefits of the program will increase as the difference increases.

[8] The PURA Legislative Report, however, recommends that the RRES program offers a single Netting tariff and the Buy-All tariff should be available to only low-income customers and multifamily affordable housing. To date, the majority of NRES customers have chosen the Netting tariff over the Buy-All, suggesting that the Netting tariff is preferable to them. However, the Buy-All tariff is preferable for low-income customers and multifamily affordable housing, because it is simpler and more compatible with the low-income discount rate (LIDR). PURA Legislative Repot, pages 40 and 42.

[9] PURA Legislative Report, page 40 (RRES) and page 65 (NRES).

Flat rates can be estimated to approximate the hourly value provided by the solar generation. This can be done by calculating the weighted average of the hourly value of generation, i.e., hourly avoided cost, based on the generation profile of solar resources in Connecticut from a chosen weather year.

OCC also recommends that PURA consider using instantaneous netting for determining energy export compensation for RRES, for those customers with the metering capability. Instantaneous netting provides a more accurate indication of the magnitude of energy exports from solar. Once instantaneous netting is applied, time-differentiated energy export rates can be applied as well to provide compensation rates that most accurately reflect the hourly value of the solar generation. This becomes especially important for encouraging customers to install storage.

OCC further recommends that the RRES Netting tariff requires the customers to have TVRs, for those that have the metering capability. TVRs would provide solar customers compensation during the solar generation hours that more accurately reflects the benefits they are providing to the system in those hours, thereby mitigating any over or underpayment for the generation. TVRs should be implemented as soon as practical following any future generic TVR docket or future rate cases that establish TVRs.

RRES - Buy-All

OCC recommends that the Buy-All tariff requires the customers to have TVRs, for those that have the metering capability. This will generally encourage efficient customer consumption patterns. TVRs should be implemented as soon as practical following any future generic TVR docket or future rate cases that establish TVRs.

The OCC recommends, however, that the solar generation payments provided in the Buy-All tariffs be based on a flat rate. A flat compensation rate is more practical because it is easier for the utility to implement and the customer to understand. Flat rates can be estimated to approximate the hourly value provided by the solar generation.

B. Should RRES align with the NRES/SCEF Framework?

As noted in the previous sections, the OCC generally provides the same recommendations regarding time-differentiated compensation for the RRES programs as the NRES and SCEF programs. There are some important considerations that might warrant differences between the residential and the non-residential programs.

For example, the RRES program is likely to benefit from simple, easy-to-understand compensation structures so that residential customers are more likely to participate or modify their behavior. This might suggest a simpler window or tiers for time-differentiated compensation for RRES. Similarly, NRES customers might be able to respond differently at different hours than RRES customers, due to their energy use patterns, ability to adopt technology automation, and other factors.

C. Should Time-Differentiated Export Compensation Wait Until Updated TVRs Are Available?

As noted above, OCC recommends that Netting energy exports be compensated at a flat rate below the full retail rate, and that flat rates can be estimated to approximate the hourly value provided by the solar generation. In this way, the flat export rates can act as a proxy for time-differentiated export rates. With this approach, PURA does not need to wait for updated TVRs to apply a proxy for time-differentiated export rates.

Time-differentiated solar export compensation rates do not require resolving some of the challenging issues required for designing TVRs. For time-differentiated solar export rates:

- There is no need to determine specific peak period windows for the solar export compensation. The window for solar generation export pricing can be based on the average hours of solar generation in Connecticut.[10]
- There is no need to calculate specific prices for specific peak period windows for exports. The export rates can be based on an average of the marginal avoided costs during the average hours of solar generation in Connecticut.
- Questions regarding TVR opt-out versus opt-in enrollment are simpler because the programs themselves are opt-in.
- Customer education is much simpler because solar export compensation rates are not designed to change customer consumption patterns; they are designed to fairly compensate solar generation for its temporal value.

D. Should New Residential Solar Receive AMI Priority?

AMI offers three advantages for solar programs. First, it allows for instantaneous netting, which allows for a more accurate estimate of the magnitude of solar exports. Second, it allows for detailed time-differentiated compensation for solar exports. Third, it allows for TVRs for the electricity that customers consumer after accounting for the solar generation (and storage charging and discharging where relevant).

[10] It might make sense to change these across seasons to reflect the variation in solar generation between seasons.

OCC generally supports these three features of solar programs, and therefore generally supports prioritizing new residential solar installations for AMI.

At a minimum, AMI should be prioritized for customers installing energy storage. TVRs are essential for providing incentives for storage installation and operation. If a customer installs storage when installing solar, then the customer should also get an AMI meter at that time. If a customer adds storage after previously installing solar PV, then the customer should also be prioritized for an AMI meter.

V. Residential Metering Requirements

At this time, OCC does not see a reason to eliminate or modify the solar production meter requirement. A production meter requirement should not be eliminated without a NEPOOL-GIS compliant alternative in place. If generation is overreported through an inferior measurement method, then non-participating ratepayers would absorb the overcharge.

OCC is generally open to considering alternative metering situations and potential modifications. For example, it may be worth exploring how smart inverters could be adopted through PURA-approved data aggregator arrangements with inverter platforms.[11] Smart inverters would allow real-time data for time-differentiated compensation, storage dispatch verification, and a lower installation cost since it entails monitoring built into modern inverters. Such smart inverters typically require a data integration agreement with the EDC.

[11] Example of smart inverter: https://www.solaredge.com/us/products/metering-and-sensors/hd-wave-built-in-metering

VI. RESIDENTIAL INCENTIVE ADDER IMPLEMENTATION

OCC continues to support the inclusion of a tariff adder or other tiered compensation level to support distressed municipalities participation in an RRES successor program.

OCC recommends that PURA maintain the existing adder until a full analysis is conducted to evaluate whether the adder increases solar deployment among underserved customers. The incentive adders have increased over time, and the share of projects in underserved communities has increased as well, but the share remains significantly under the 40 percent target. The adders alone may not be responsible for the increase in participation, as there were other program modifications such as expanded eligibility. An increase in the adder may not translate to more installations, which would indicate an inefficient use of ratepayer funding. OCC recommends a study be completed to assess the best methods for increasing installations in distressed communities, and that the study be completed prior to any further increase in the volumetric adder.

VII. ADDITIONAL TOPICS

Benefit-Cost Analyses and Rate and Bill Analyses

As indicted throughout these comments, the OCC recommends that BCAs and RBAs be used to address several questions regarding successor program designs.

- BCAs indicate the net benefits that will be provided by different programs and program designs. All else being equal, those programs and designs that maximize net benefits (or minimize net costs) should be preferred.

- RBAs indicate whether and to what extent a program or program design will result in increased rates and bills. An RBA should account for all the utility system costs and benefits, as well as the impact on rates of reduced customer sales and the recovery of lost revenues.[12] All else being equal, those programs that minimize rate increases or maximize rate reductions should be preferred.

Both BCAs and RBAs can be applied to different programs and program designs to help make tradeoffs, if necessary, between maximizing net benefits and optimizing rate impacts.

OCC appreciates the BCA presented in the PURA Legislative Report, as it provided useful information regarding the potential rate impacts of different RRES designs.[13] OCC recommends that this docket includes a more extensive use of such analyses to answer some key program design issues. This is consistent with the PURA Legislative Report recommendations that ratepayer cost-effectiveness be considered in setting compensation rates.[14] It is also consistent with several provisions in Public Act No. 26-127 that require that the successor program designs consider benefits received by all ratepayers.[15]

BCAs and RBAs can help address, for example, some of the following questions:

- What level to set export compensation rates at for Netting tariffs, whether time-differentiated or not.

[12] For more information on the preparation and application of RBAs, see National Association of State Energy Officials, *The National Standard Practice Manual for Cost-Effectiveness of Distributed Energy Resources*, prepared by the National Energy Screening Project, May 2026, Appendix B.

[13] PURA Legislative Report, pages 42-44.

[14] PURA Legislative Report, e.g., pages 1, 2, 4, 15, 16, 33, 34, 92, and 125.

[15] Public Act No. 26-127 §§ 1(c), 1(g), 2(d), 3(c), 4(a), and 4(b).

- What level to set generation compensation rates at for Buy-All tariffs, whether time-differentiated or not.
- The difference in net benefits and rate impacts provided by Netting tariffs versus Buy-All tariffs.
- The net benefits and rate impacts of the SCEF program.
- How to best allocate program contributions toward the annual program budget cap.

Low-Income Customers, Multifamily Housing, and Distressed Municipalities

OCC supports continued efforts to increase access to solar programs for low-income and historically underserved customers, particularly residents of environmental justice communities that have limited access to renewable energy resources while bearing the brunt of health impacts from emissions. With adequate consumer protections and fair financing terms in place, solar programs can be an important tool in the effort to achieve affordability for low- and moderate-income customers.

OCC agrees with the PURA Legislative Report recommendation to limit the SCEF program enrollment to low-income customers and multifamily affordable housing.[16] This means that low-income customers and multifamily housing will have two solar program options. The RRES Netting tariff also provides adders for low-income customers and distressed municipalities. Further, low-income customers have some rate protection from the LIDR.

OCC recommends that this docket be used to investigate how to best support low-income customers multifamily housing, and distressed municipalities, including a holistic consideration

[16] Public Utilities Regulatory Authority, Legislative Report, Docket No. 25-02-14, Renewable Energy Tariff Programs Successor Study, February 27, 2026 (PURA Legislative Report), page 91.

of the relevant designs of the SCEF program, the RRES Buy-All tariff, the RRES Netting tariff, and the LIDR.

VIII. CONCLUSION

OCC thanks the Authority for consideration of these comments. As noted above, OCC's input offered through these comments is preliminary, as OCC continues to gather data and information to better understand the issues and develop final recommendations for PURA.

Respectfully submitted,

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CERTIFICATE OF SERVICE

I do hereby certify that on this day the foregoing document was filed with the Public Utilities Regulatory Authority, and copies thereof were served upon each person designated on the official service list in this proceeding in accordance with R.C.S.A. § 16-1-15.

Dated at New Britain, Connecticut this 26th day of August, 2026.

/s/ Paschaline Poku
Paschaline Poku, Esq.
Commissioner of the Superior Court