August 26, 2026

VIA ELECTRONIC FILING

Mr. Jeffrey Gaudiosi, Executive Secretary
Public Utilities Regulatory Authority
Ten Franklin Square
New Britain, Connecticut 06051

Re: Docket No. 26-06-04: Implementation of Clean Energy Successor Programs; CONNSSA Written Comments

Mr. Gaudiosi -

The Connecticut Solar & Storage Association ("CONNSSA"), the state's solar industry business group, submits this response from Connecticut solar installer and commercial solar developers to the Authority's (PURA) Notice of Request for Written Comments issued in the above-referenced docket.[1] CONNSSA requests that the PURA consider the following positions in developing successor programs to the Residential Renewable Energy Solutions ("RRES"), Non-Residential Renewable Energy Solutions ("NRES"), and Shared Clean Energy Facility ("SCEF") Programs.

1. Time-Differentiated Compensation

a. NRES and SCEF Successor Programs

The Authority seeks stakeholder feedback regarding whether time-differentiated compensation should be implemented for the successors to the NRES and SCEF Programs, including comment on the suggested granularity of such rates, how collocated energy storage can respond to time-differentiated price signals, applicable metering requirements, and how to evaluate a project's contribution toward the annual program budget cap.

CONNSSA believes that time-differentiated compensation would inject needless complexity into the economics of solar-plus-storage projects without a corresponding benefit to ratepayers or developers. Solar developers will already be responding to meaningful programmatic pricing signals, as the successor programs contemplate a shift to instantaneous netting of solar production, a change that alone will affect how commercial projects value on-site generation relative to export.

[1]Docket No. 26-06-04, Notice of Request for Written Comments (July 28, 2026).

That shift is expected to encourage commercial projects to pair solar with energy storage based on signals that are already present in the market, independent of any time-differentiated rate structure. Developers will look first to maximize the value of self-consumed energy rather than exporting it to the grid at curtailed values. They will also calibrate energy storage to deliver additional power to a facility at specific times of day in order to lower demand-facing charges, and they will continue to pursue participation in active dispatch events under the Energy Storage Solutions program during the summer and winter months to help relieve overall stress on the utility grid. Each of these signals independently drives the behind-the-meter storage pairing that time-differentiated compensation is intended to incentivize.

Layering time-differentiated compensation rates on top of these existing signals would be needlessly duplicative and complex. Commercial operators need rate certainty to secure capital from project financiers, and CONNSSA believes ample signals are already in place to ensure that developers and businesses incorporate storage into behind-the-meter solar installations under the successor program.

CONNSSA also believes it would be premature for PURA to adopt time-differentiated rate structures for the successor solar programs before standard time-varying rate structures exist generally for Connecticut ratepayers. Before time-differentiated compensation can responsibly be implemented, numerous questions would need to be resolved, including what hours of the day constitute on-peak and off-peak periods, whether those rates would vary seasonally or throughout the year, and whether they would be tied to specific line items on the utility bill.

CONNSSA also asks PURA to be mindful of how the current NRES netting tariff structure already discourages participation by the very behind-the-meter projects the successor program is meant to support. Of the roughly twenty commercial meter and tariff classes available today, only two currently earn NRES incentive compensation beyond the standard value of energy. Meter classes designed to serve some of the state's most vulnerable institutional customers, including schools and churches, are among the most financially punitive under this structure. A developer that installs a project under one of those specific meter classes can see Renewable Energy Credit compensation drop to negative rates rather than a positive incentive. The netting rate structure adopted for the NRES successor program should be designed to encourage participation by community institutions and non-profits, not to lock them out of the savings that clean energy is intended to provide.

Relatedly, CONNSSA requests clarification from PURA and the electric distribution companies ("EDCs") as to whether their existing billing systems can accommodate interval data at all. The more readily achievable transition, though one that would still require adjustments to the EDCs' billing systems, is a shift to instantaneous netting.[2]

Finally, with respect to how a project's contribution toward the annual program budget cap should be evaluated, CONNSSA recommends that such contribution be limited to the amount of energy exported to the grid multiplied by the applicable compensation rate.[3]

b. RRES Successor Program

The Authority requests stakeholder comments on the potential adoption of time-differentiated export compensation rates in the successor to the RRES Program, including whether such a program should be aligned with any time-differentiated framework adopted for the NRES and SCEF successor programs, the optimal timing of any such shift, and whether time-differentiated compensation should extend to the Buy-All tariff rate.

CONNSSA similarly opposes shifting RRES compensation to a time-differentiated framework, for many of the reasons discussed above with respect to the NRES and SCEF successor programs.

While residential customers do not face the demand-facing charges that commercial customers do, the shift from monthly net metering to instantaneous netting will itself provide a significant signal to residential developers and homeowners to explore pairing solar with storage as part of a holistic project design. Layering a time-differentiated framework on top of instantaneous netting would be duplicative and onerous, and it may not be a feasible billing structure for the utilities to implement in the near term.

For multifamily affordable housing ("MFAH") projects in particular, time-differentiated pricing would introduce billing complexity and financial unpredictability for low-income ratepayers who most need rate security. Moreover, the system owners and developers of Buy-All MFAH projects would not be in a position to respond to time-differentiated pricing signals in any event, because Buy-All systems are incompatible with behind-the-meter energy storage. To CONNSSA's knowledge, no MFAH project in Connecticut has been installed with both a Buy-All tariff and behind-the-meter energy storage.

CONNSSA also notes that Connecticut homeowners are not, at present, generally familiar with how time-differentiated or time-of-use rates work. Introducing such rates for the first time through a solar program would only introduce needless confusion. Time-of-use rates should be explored as part of Connecticut's energy future, but they should be negotiated first as part of a broader rollout among all Connecticut ratepayers before being introduced into the successor solar programs.[4]

---

[2]Eversource Interrogatory Response, Docket No. 26-06-04, OCC-007 (Aug. 25, 2026).
[3]Public Act No. 26-127 § 4(a).

2. Residential Metering Requirements

The Authority requests stakeholder comments on whether the solar production meter requirement should be modified in the residential successor program, and, if so, a discussion of alternative methods for REC measurement, including their accuracy, cost, administrative feasibility, and legal permissibility.

For netting projects, CONNSSA believes serious consideration should be given to discontinuing the requirement for a separate, utility-owned production meter. That requirement carries additional hard cost and complicates the interconnection process, without a commensurate benefit as the program shifts toward instantaneous netting.

This position is consistent with CONNSSA's comments in prior dockets addressing residential production metering.[5] In each of those proceedings, CONNSSA argued that modern solar-plus-storage platforms possess reliable, on-board digital metering technologies capable of substituting for a physical, utility-owned production meter.

As netting projects shift toward instantaneous netting, CONNSSA recommends that PURA consider two strategies. The first is a shift toward inverter-level reporting. When the Connecticut Green Bank administered the Residential Solar Investment Program, it demonstrated that the value of RECs could be registered through inverter-level reporting.[6] Customers participating in the Massachusetts Class I REC market are able to utilize inverter-level reporting today through a subscription to Powerdash.[7] The second strategy is to shift REC-level generation measurement to the net meter. While this approach would not capture all solar production, it would capture the generation exported to the grid, and the net meter remains a revenue-grade meter that should be permitted to report and sell RECs on that basis.

---

[4]PURA Corresp., Feb. 27, 2026, Docket No. 25-02-14, Renewable Energy Tariff Programs Successor Study, pp. 40–42.

[5]See Docket No. 24-01-02, PURA Investigation into Interconnection Process Modifications; Docket No. 20-07-01, PURA Investigation into the Establishment of a Residential Renewable Energy Solutions Program; Docket No. 21-08-03 (Year 1) and Docket No. 22-08-03 (Year 2), Annual Residential Renewable Energy Solutions Program Reviews.

[6]Connecticut Green Bank, Residential Solar Investment Program, inverter-level reporting for REC registration.

[7]Massachusetts Class I Renewable Energy Certificate market, inverter-level reporting available via subscription to Powerdash.

3. Residential Incentive Adder Implementation

Stakeholders are invited to comment on whether a distressed municipality adder or separate tariff rate should continue to be administered in the successor residential program as a volumetric adder based on total production, or through an alternative method.

CONNSSA recognizes the value of continuing to support enrollment of underserved customers in the successor program, with particular focus on low-income customers and customers residing in distressed municipalities.[8]

CONNSSA suggests that how these incentives are paid out could reasonably be shifted based on how the solar project is interconnected. For projects on a netting tariff, the adder could continue to be applied to the base compensation rate for all energy exported to the grid in a billing cycle, and treated as an on-bill credit as it is today.

For projects on a Buy-All tariff, the adder could instead be applied to the base compensation rate for Buy-All projects, with a percentage of the overall tariff amount designated as a cash payment to a third party or as an on-bill credit, consistent with the terms currently employed under the existing RRES program rules.

4. Additional Topics

Commercial size-to-load restrictions

CONNSSA requests that PURA eliminate "size-to-load" restrictions for rooftop solar and parking canopy installations, consistent with Public Act No. 26-127.[9] The legislation draws no distinction between Buy-All and netting tariff compensation in this respect, and the successor programs should respect that provision as well.

In the event PURA elects to preserve system-size limits only for netting tariff projects, CONNSSA requests that PURA permit developers to submit professional-engineer-stamped certification letters in support of increased usage profiles. This flexibility is important in circumstances where a new business moves into an existing facility and its expected usage exceeds the electrical needs of the facility's previous occupant.

[8]Public Act No. 26-127, § 1(c).
[9]Public Act No. 26-127, p. 7.

Residential Successor Compliance Filings

CONNSSA also asks PURA to revisit the compliance filing requirements imposed on RRES-enrolled installers under the program's enforcement framework, commonly referred to as the "four-strike" system. In CONNSSA's view, that system assigns strikes too rigidly, without meaningfully distinguishing between an issue arising from marketing, an issue arising from training, or an issue arising from a savings methodology filing, even though these categories of noncompliance differ substantially in severity and in the corrective action they warrant.

As of the annual review conducted in Docket No. 26-08-02, RRES-enrolled installers are required to submit, for each project, all customer disclosure forms; an unlocked Excel workbook summarizing key information from the customer disclosure form and other information provided to the customer (the "Financial Benefits Summary Sheet"); a narrative explanation of any calculation methodology included in the Financial Benefits Summary Sheet (the "Financial Benefits Narrative"); any and all marketing materials or sales scripts; and training materials.[10]

With respect to the customer disclosure forms specifically, that information is already submitted to the electric distribution companies. We have made this point repeatedly. Requiring installers to separately refile disclosure forms that have already been filed with the utility is a needlessly duplicative administrative burden that does not generate any new compliance information for PURA.

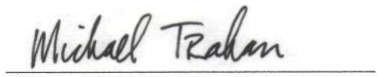
Make no mistake. CONNSSA respects the effort by the Office of Education, Outreach, and Enforcement ("EOE") to identify and restrict program participants who repeatedly break the rules. Still, CONNSSA believes a broader discussion is warranted regarding which components of this annual compliance package should be carried forward into the successor program. With respect to marketing materials, CONNSSA recommends that EOE move away from requiring annual filings of marketing materials and sales scripts and instead develop a rubric identifying the characteristics of deceptive marketing. EOE's efforts in this regard could be informed by, and coordinated with, the complementary work already underway at the Office of Consumer Counsel ("OCC") to develop a handbook governing home solicitation sales.[11]

More generally, CONNSSA urges PURA to focus compliance efforts on correcting installer behavior rather than defaulting to strikes and other punitive measures. In education, for example, teachers commonly develop rubrics illustrating both strong and weak examples of student work. Such rubrics allow an educator to grade with greater consistency, and they also show a student what excellent work looks like before an assignment is ever submitted.

---

[10]Docket No. 26-08-02, Annual Residential Renewable Energy Solutions Program Review and Rate Setting, Year 6.
[11]Public Act No. 26-16.

Under the current RRES program, strikes and warnings have been administered inconsistently, and PURA has not published installer-facing material explaining the circumstances under which marketing materials would result in a strike. CONNSSA recommends that the Authority take a lesson from the education field and develop clear rubrics, together with genuine remediation procedures, before assigning strikes to contractors in the successor program.



Michael Trahan
Executive Director
Connecticut Solar & Storage Association
P.O. Box 515
Higganum, CT 06441
860-256-1698
miket@connssa.org www.connssa.org