STATE OF CONNECTICUT
PUBLIC UTILITIES REGULATORY AUTHORITY

RE: IMPLEMENTATION OF CLEAN	**:**	**DOCKET NO. 26-06-04**
ENERGY SUCCESSOR PROGRAMS	**:**	
	:	**AUGUST 25, 2026**

COMMENTS ON BEHALF OF THE NATURE CONSERVANCY

The Nature Conservancy (TNC) appreciates the opportunity to provide comments in response to the Public Utilities Regulatory Authority (PURA) Notice of Request for Briefs, dated July 20, 2026, in Docket No 26-06-04. Both the **Non-Residential Renewable Energy Solutions (NRES)** and **Shared Clean Energy Facility (SCEF)** programs have been active and expanding in Connecticut, with evidence of tangible results in renewable energy deployment and equitable access. We believe that with careful consideration of stakeholder input, successor programs to NRES and SCEF will continue to grow and provide multiple benefits to Connecticut residents.

This docket seeks information on whether Public Act No. 26-127 allows for PURA to utilize a standard-offer compensation framework to successor programs for the NRES and SCEF Programs. Both programs currently offer competitive offer pricing for solar projects that fit program requirements. A standard-offer compensation framework would allow PURA to administer a non-competitive procurement process and to "replace the current competitive solicitation process with a 'walk-up' approach where projects are awarded standard-offer tariffs upon meeting maturity requirements (e.g., site control, permits, and interconnection agreements)."

We believe that both methods, competitive offer and standard offer, can be part of successor program procedures. This would allow for the state to be flexible in determining the optimal solutions for solar buildout in the state that benefits the communities in which those projects will be built. Briefs submitted by various stakeholders support the idea that both methods could be part of successor program processes, but ambiguity in language should be corrected.

Competitive bidding procurement programs favor large developers for large projects. This type of bidding is cost-effective for ratepayers, but crowd out smaller projects, often located in vulnerable communities, which may lack the resources and infrastructure to compete. Standard-offer procurement allows the State to select projects it has an interest in supporting with multiple benefits to communities that would not otherwise have an opportunity to host solar projects.

Competitive procurement remains a good model for larger-scale projects, and larger project developers can harness economies of scale to inform their bids. **Overall**, this method is more transparent, has better cost control, and allows for higher-quality proposals. We believe this should remain in effect for successor programs.

However, for smaller or more complex projects, we believe that a standard offer model can be extremely beneficial. Standard offer is simpler, faster, allows for smaller projects to move forward, and avoids the complexity of competitive bidding. To incorporate standard offer procedures, PURA would need to

utilize regulatory tools to preserve cost competitiveness, while also considering and giving value to the multitude of benefits received from solar installations. We believe that this could be done and should be integrated into successor program development.

In summation, both competitive offer and standard offer can be incorporated into the NRES and SCEF successor programs and we urge PURA to adopt a more flexible framework for these programs based on specific criteria. We thank you for the opportunity to provide comments regarding this docket on behalf of The Nature Conservancy.