CAE-008 Q:

CCWG Report, p. 59. Which of the CCWG's proposed changes to the customer disclosure forms would require changes in PowerClerk? Discuss the feasibility of adding standardized rates in the PowerClerk RRES application, with the option for users to override the default standardized rate when allowed to do so. If PowerClerk changes are required, provide an estimated cost and timeline for implementation.

CAE-008 A:

The United Illuminating Company ("UI" of the "Company") has reviewed the Contractor Compliance Working Group ("CCWG") Report and the current Residential Renewable Energy Solutions ("RRES") Program PowerClerk functionality. The proposed Customer Disclosure Form ("CDF") changes that would require PowerClerk configuration are those that alter data fields, form labels, conditional fields, validations, generated forms, or compliance reporting within the RRES application. To the extent ordered by the Public Utilities Regulatory Authority ("PURA" or the "Authority") and required to be captured in PowerClerk, those changes may include standardized fields for Average Starting Utility Rate, Utility Escalation Rate, and photovoltaic ("PV") Degradation Rate; authorized override and explanation fields; the multi-year savings checkbox and related escalation/degradation fields; revised Direct Owner and Third Party Owned disclosure terminology; any ordered definitions, financing, or compliance-reporting fields; and any related workflow or form-template mapping.[1]

Adding standardized rates in PowerClerk with an override option, where allowed by the Authority, can be achieved, provided that final specifications are established by the Authority. PowerClerk is already used for RRES application intake and project lifecycle tracking. The

[1] PURA, Interrogatories Set 1, Docket No. 26-08-02, May 11, 2026, CAE-008; EOE, Contractor Compliance Working Group Report, Docket Nos. 25-08-02 and 26-08-02, March 31, 2026, Section VI.B and Section VI.J.

CCWG Report notes that Estimated Year One Production is currently the only PowerClerk-calculated value and that it can be manually overridden with appropriate controls. The CCWG Report also identifies standardized rates as potential PowerClerk application fields with manual override capability where allowed.[2]

UI cannot provide a rigorous estimate or an implementation timeline until PURA issues a final decision that defines the required full and final specifications for the Program. These specifications include, but are not limited to, Program rules, CDF revisions, standardized-rate values, update frequency, override rules, audit controls, and reporting requirements. The Company cannot estimate the cost without engaging a third-party PowerClerk system vendor, which will require the final specification of Program rules. These considerations are essential to ensure that any PowerClerk design delivers measurable benefits without imposing undue costs on ratepayers. Once those specifications are known, implementation would require business requirements, functional specifications, vendor design/configuration, form-template updates, validation and reporting logic, software developer functional and unit testing, UI user acceptance testing, defect remediation, deployment planning, production rollout, and post-production validation.

If contractors are permitted to generate completed CDFs outside PowerClerk and upload them following customer execution, PowerClerk system modification may be limited to

[2] EOE, Contractor Compliance Working Group Report, March 31, 2026, Section II.C and Section VI.J; Attachment B, PowerClerk Estimated Annual Production Calculation; UI Residential Renewable Energy Solutions public program materials describing use of UI's PowerClerk Renewable Energy Solutions Portal for application submission and lifecycle tracking.

functionality supporting document upload, review workflows, checklist verification, and reporting. However, if PowerClerk is required to generate or populate the CDFs, additional system enhancements would be necessary, including changes to forms, data fields, validation rules, user permissions, reporting capabilities, and workflow processes. Any expenditures required by these changes would need to be evaluated upon finalization of the program scope and cannot be reasonably estimated at this time. The Company further notes that such costs should be eligible for appropriate cost recovery, as these enhancements are being implemented as part of Program administration and in compliance with PURA-established Program rules.