**Date Submitted: May 28, 2026**

**CAE-009 Q:**

Motion No. 26, Docket No. 25-08-02. Describe the company's current practice for applying non-bypassable charges, applying income-eligible and distressed municipality adders, and certifying REC eligibility for RRES Program customers with DC-coupled solar and storage systems utilizing a shared inverter.

**CAE-009 A**:

The United Illuminating Company ("UI" of the "Company") administers Residential Renewable Energy Solutions ("RRES") Program Netting projects using the Public Utilities Regulatory Authority (the "Authority" or "PURA"), approved application materials and Statement of Qualification records, the applicable Tariff vintage, available production-meter data, and the income-eligible and distressed municipality Adders and payment-beneficiary determinations made in accordance with the RRES Program Manual.[1]

For standard RRES configurations, UI applies the Solar Production Charge ("SPC"), a non-bypassable charge and applicable Netting incentive Adders as volumetric per-kilowatt-hour ("kWh") components using the production quantity available from the project metering and program records.[2] The SPC is automatically calculated in the billing SAP system and reflected on the customer's bill based on the production meter reads. Income-eligible and distressed municipality Adders are applied based on eligibility determinations established at the time of project qualification and reflected in Program records.

Motion No. 26 addresses a discrete category of direct current ("DC")-coupled solar co-

1. PURA, Interrogatories Set 1, Docket No. 26-08-02, May 11, 2026, CAE-009; Residential Renewable Energy Solutions Program Manual, Version 2026.1, effective Jan. 1, 2026, Section VI.O.
2. Residential Renewable Energy Solutions Program Manual, Version 2026.1, Section VII, Metering, and Appendix E, Terms and Conditions.

located storage projects utilizing a shared inverter, where the approved system configuration, shared inverter design, or presence of the downstream parasitic, auxiliary, or backup load may cause the production meter to record energy other than photovoltaic ("PV")-only renewable generation. For those affected configurations, UI currently relies on available metering data but has proposed, and is awaiting Authority direction on, the proxy-production methodology to address such measurement limitations for the Solar Production Charge and applicable Netting Adders. [3]

Under the approach put forth by UI, the affected-project calculation would use the approved aggregate alternating current ("AC") inverter nameplate capacity reflected in the project's RRES and interconnection application, multiplied by a PURA-approved production factor, expressed in kWh per kW-AC, and consistent with the annual Residential Tariff rate-setting framework, and allocated to billing months or billing cycles using a standard monthly production profile. [4]

Please refer to the Company's response, CAE-011, in the above-referenced docket. For RRES Program customers with DC-coupled solar and storage systems utilizing a shared inverter,

3. UI Motion No. 26, Docket No. 25-08-02, as summarized in PURA Notice of Request for Written Comments, Docket No. 26-08-02, May 11, 2026, Section 3; UI Proposed Replacement Language, Sections II.b and II.e.
4. UI Proposed Replacement Language, Sections II.b and II.f, addressing proxy production for affected DC-coupled configurations, application-year tariff vintage, and original adder qualification.

the Company does not independently determine Renewable Energy Certificate ("REC") eligibility and instead relies on the statutory and regulatory framework established by the Connecticut legislature and PURA. Pursuant to Conn. Gen. Stat. § 16-1(a)(20), only energy generated by an eligible Class I renewable resource qualifies for Connecticut Class I RECs, and energy storage systems, including batteries, are not considered Class I generation resources because they do not independently generate renewable energy. As such, while a battery may be paired with a photovoltaic system, the potential for the battery to charge from the grid or other non-eligible sources introduces uncertainty as to whether discharged energy is solely attributable to a qualifying Class I resource. Accordingly, REC eligibility for such hybrid configurations is determined exclusively through PURA's certification process. After a generator goes in service, the Company registers the generators in the New England Power Pool Generation Information System ("NEPOOL GIS"), and the Company submits a Connecticut Class I Renewable Energy Source Certification application to PURA, which evaluates technology type, fuel eligibility, metering, and operational characteristics before issuing a Final Decision explicitly stating whether the project qualifies as a Class I resource. NEPOOL GIS subsequently implements PURA's determination by updating the project status and issuing RECs consistent with that certification. The Company does not determine Class I eligibility and recognizes RECs only as designated in NEPOOL GIS pursuant to PURA's authoritative determination.