25-08-02; 26-08-02

Attachment A

STATE OF CONNECTICUT

PUBLIC UTILITIES REGULATORY AUTHORITY

OFFICE OF EDUCATION, OUTREACH, & ENFORCEMENT

DOCKET NO. 25-08-02 : CONTRACTOR COMPLIANCE WORKING GROUP

MEETING NOTES

Meeting #1
Thursday, January 22, 2026
10 am – 12pm ET

Intro

The goal of the Contractor Compliance Working Group is to develop recommendations regarding specific inputs, assumptions, and calculation methodologies that should be standard across RRES project applications. The second objective is to develop a recommendation for verifying the timing of disclosure form provision, either at the time of application or through EOE's contractor auditing process.

Additionally, the working groups recommendations at minimum will include proposals for standardizing the starting utility rate used to estimate the net year one savings, annual utility rate escalation, and degradation rate. This report will also include proposed changes to PowerClerk in the report.

This working group comes out of Docket No. 25-08-02 and the final report from this working group is due March 31st in Docket No. 26-08-02. This report will identify consensus and non-consensus proposals. It is important to note that the Authority will determine which proposals to order and implement; consensus and non-consensus proposals are not guaranteed to be adopted or rejected by the Authority.

Meeting Start Time: 10:00 am

Participants

Participants: Jamie Spannhake (EOE), Alexander Torrealba (UI), Alexis Haskell (BrightOps), Athena Feola (EOE), Michael Bokowski (UI), Carlos Lozano (GoodLeap), David Hernandez UI), Dominic Gatti (Tesla), Dominique Moise- Johnson (UI), Ed Merrick, Heidi Dragonette (UI), Jacqueline Monsanto (UI), Jim Ferrughelli (SAVKAT), Katerina Miller (UI), Katherine Von Steinman (EOE/DOE), Kyle Wallace (SunRun), Michael Farrell (Trinity Solar), Mike Trahan (CT Solar & Storage Assn.), Nicole Grant (EOE), Sarah Hildebrand (Tesla), Sara Pyne (CGB), Sean Riel (Earthlight Tech), Cornelius Stevenson (UI), Todd Carew (Ion Solar Pros), Kim White (OCC), Brittany Wyman (EOE), Rocco Cimino (UI), Heather Tebbetts (UI), Betsy Scherzer (GoodLeap)

Administrative Items

- Slides will be distributed to participants following the meeting.
- Voting/Absence: Organizations may designate an alternate representative to vote in the event of an absence.

Discussion

Topic 1 Standardizing the Starting Utility Rate

Starting Utility Rate is the rate used to calculate savings based on the installation of solar. Currently used methods include the average of the past 12 months of the customer's actual utility rate, the average of the past 12 months of Standard Utility Rate, and other methods utilized by solar contractors.

There was group discussion highlighting a few different perspectives and ideas when it comes to this topic.

- Average of the customers last 12 months of actual billed rates
- Average of the last 12 months of standard service rates
- Prevailing rate at the time of proposal
- A standardized rate issued by PURA, potentially modeled on Massachusetts SMART program.

<u>Key Themes</u>

<u>Consistency versus Accuracy</u>

- Consistency is critical for consumers comparing multiple proposals.
    - Different proposal dates (June vs. July rate changes) can otherwise produce confusing and incomparable results.
- Accuracy, matching a customer's actual bill, generally requires manual review of 12 months of bills, which is prone to error and makes it difficult to review.
- Both consistency and accuracy are important, but some level of abstraction is unavoidable.

<u>Use of Software and Methodologies</u>

- Some developers used tools such as Genability, which capture tariff changes over time and reduce manual error.
- Third Party supplier rates may not always be captured.
- There was agreement that methodologies must be transparent and explainable to customers, regardless of the approach used.

Utility Perspectives

Heather Tebbetts and Katerina Miller from United Illuminating (UI) supported using the prevailing rate at the time of proposal.

- It best reflects the current market conditions
- A 12-month average may miss rate cases, temporary bond related reductions, or other recent adjustments.
- Contractors countered that single month rates fail to capture known seasonal and structural variability (summer vs. winter supply rates).

Non-Bypassable Charges (NBCs)

- Kyle Wallace raised concern that disclosure forms currently show a single utility rate, which can inflate savings if NBCs are not handled properly.
- Many proposals internally calculate savings using utility rate minus NBCs, but this distinction is not visible to customers.
- Definitions and customer communications around NBCs were identified as an unresolved issue.

Export Compensation vs. Starting Utility Rate

- David Hernandez (UI) clarified that the export compensation rate is established by PURA and does not vary by supplier.
- EOE clarified that this compensation rate is distinct from the starting utility rate used for savings projections.
- Agreement emerged that definitions must clearly distinguish these concepts to avoid confusion.

Areas of Alignment

- There is no perfect method for calculating a starting utility rate.
- Transparency about assumptions and limitations is essential.
- Customers must be able to compare proposals apples-to-apples.
- There is openness to PURA issuing standardized reference rates, similar to MA SMART.

Topic 2 Annual Utility Rate Escalation

Annual Utility Rate Escalation is the rate used to increase the starting utility rate to calculate savings over a period of time. EOE has seen escalation rates between 2% and 6%. How do companies establish these escalation rates?

Current Practices

- Most developers use around 3%, with some finance companies allowing up to 4%.
- Rates are typically based on
    - 10-16 years of historical utility rate data
    - PURA decisions
    - EIA data
- This appears to be industry standard.
- Companies avoided using recent high increased to prevent unrealistic long-term projections.

Key Themes

Basis for Escalation Rate

- Historical, long-term averages are more defensible than short-term trends.
- 3% is conservative; higher rates may be more accurate but risk overstating savings
- 3-4% aligns with the long-term expectations and finance constraints as some financial institutions will not allow a higher precent.

Role of PURA

- There was a strong sense of support for PURA establishing a standardized escalation rate or cap.
- Suggestions included:
    - PURA publishing a yearly table based on long-term historical data.
    - Higher bar for changing the rate year-to-year to avoid reacting to short term volatility.

Finance and Investor Constraints

- Escalation rates used in sales proposals differ from those used in investor underwriting.
- PURA mandated escalation rates should be understood as a standard for customer disclosure, not necessarily a requirement for financial modeling, provided transparency is maintained.

Implementation and Transitions

- Concerns were raised about:
    - Projects already in flight when rates change.
    - Need a clear transition rule (proposal date, credit approval rate).

Areas of Alignment

- Standardization (rate or cap).
- PURA-set methodology.
- Need for simplicity and customer comprehension.
- Importance of transparency and disclosure of assumptions.

Topic 3 Standardizing the Degradation Rate

Degradation rate is the rate at which the solar panels' production degrades. It is a percentage that is applied over time. Is that rate different depending on the panel? Does the rate change depending on other items such as shading, inverters used, etc.? Who determines the degradation rate?

Current Practices

- Panel spec sheets show degradation rates ranging roughly 0.25%-0.5%.
- Third-party owned (TPO) systems often default to a degradation rate of 0.5%, regardless of panel.
- Premium panels may justify lower degradation assumptions.

Key Themes

- 0.5% is widely viewed as a conservative and defensible default, particularly for investor-backed projects.
- Degradation affects production modeling more than direct financial savings, especially under PPAs.
- Tesla objected to a single mandated rate, noting real performance differences between panels.
- Betsy Scherzer (GoodLeap) proposed a standardized conservative rate for disclosures, allowing premium panels to optionally show lower degradation scenarios as a value proposition.
- Additional production factors (shading, soiling, curtailment) were noted but deferred for future discussion.

Areas of Alignment

- Transparency about assumptions is critical.
- A conservative standardized baseline may be appropriate, with flexibility for premium products.
- Further technical input may be needed.

Open Issues/Discussions

- No consensus was reached on whether the starting utility rate should be

    - A historical average, or
    - The prevailing rate at the time of proposal, or
    - A PURA-issued standardized reference rate.
- No decision was made regarding how NBCs should be displayed or incorporated on disclosure forms.
- No final determination was made for escalation rates regarding:
    - The appropriate historical lookback period,
    - Whether PURA should establish a single rate or a maximum allowable rate, or
    - How annual updates and transition timing should be implemented
- No final determinization was made on whether degradation rates should be fully standardized or presented with both conservative and panel specific alternatives.
- No determination was made regarding how additional production factors should be incorporated.

Action Items and Next Steps

- By the end of day Tuesday participants are to submit:
    - Inputs and methodologies used to calculate financial benefits, costs, and production information, and
    - Sources used in disclosure forms, financial benefit summaries, and sales proposals.
- Confidential information will be anonymized by EOE.
- EOE will compile submissions and circulate materials ahead of next meeting.
- Next Meeting: Thursday January 29th, 2026, at 10am

Proposals: N/A

Votes: N/A

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DOCKET NO. 25-08-02 : CONTRACTOR COMPLIANCE WORKING GROUP

MEETING NOTES

Meeting #2

Thursday, January 29, 2026

10 am – 12pm ET

Intro

The second CCWG meeting continued discussion from the previous meeting on Starting Utility Rates, Escalation Rates, and Degradation Rates. As well as starting the conversation on existing PowerClerk inputs, specifically which inputs and outputs are used in the customer disclosure form and whether they are manual or calculated, and the existing inputs and methodologies used to calculate financial benefits and costs and production information.

Meeting Start Time: 10 am

Participants

Jamie Spannhake (EOE), Alexander Torrealba (UI), Athena Feola (EOE), Michael Bokowski (UI), Carlos Lozano (GoodLeap), David Hernandez UI), Dominic Gatti (Tesla), Dominique Moise- Johnson (UI), Ed Merrick, Eric Annes (DEEP BETP), Heidi Dragonette (UI), Jacqueline Monsanto (UI), Jim Ferrughelli (SAVKAT), Julia Danahy (Eversource), Katerina Miller (UI), Katherine von Steinman (EOE/DOE), Michael Farrell (Trinity Solar), Nicole Grant (EOE), Sarah Hildebrand (Tesla), Sara Pyne (CGB), Sean Riel (Earthlight Tech), Cornelius Stevenson (UI), Ted Hart (Tesla), Todd Carew (Ion Solar Pros), Sergio Carrillo (CGB), Kim White (OCC), Brittany Wyman (EOE), Rocco Cimino (UI), Heather Tebbetts (UI), Betsy Scherzer (GoodLeap)

Administrative Items

- Votes taken during the meeting reflect support for concepts only and is not about a methodology for setting standardized rates.
- Silence during voting will be deemed as consent and members are encouraged to explain any objections or concerns during the meeting.

Discussion 1

Topic 1 Starting Utility Rate Methodology

Two guiding questions were brought up regarding how the starting utility rate should be derived. This could be either from the RRES Buy-All rate minus negative REC, or a historical 12-month customer all-in rate average for MPP and other payment plans similar to what the EDCs currently use.

There were concerns raised regarding:

- Reliance on third-party supplier rates due to volatility and limited contract duration.
- Use of PURA's annual IRR assumptions, which participants generally viewed as unsuitable for customer facing savings calculations.
- The timing of the starting utility rate being implemented, which was clarified that the rate would apply for a defined period of time and would not require retroactive updates for projects submitted within that period.
- Confusion surrounding the name of the starting utility rate and the standard utility rate. Is there potential to improve the customer disclosure form to reduce confusion?

<u>Areas of Alignment</u>

- Support for standardizing the approach used to determine a starting utility rate.
- Agreement that historical data is a defensible reference point.
- Recognition that customer-specific factors may need to be reflected through methodology rather than a single uniform number.
- Agreement that third-party supplier rates are not a reliable long-term benchmark.
- Potential to improve the customer disclosure form to accurately reflect the changes made form the working group.

Topic 2 Utility Escalation Rate

The guiding question for this discussion focused on validation to financial companies and investors using escalation rates that may differ from those presented to customers.

- Utility escalation assumptions used in customer facing disclosures are projections intended to support customer understanding and comparison across proposals.
- Finance companies and investors often apply separate escalation assumptions for internal validation, risk assessment, and long-term financing modeling.
- Escalation rates used by financiers may be more conservative and are not always aligned with rates presented to customers.

- Standardizing a customer facing escalation rate or cap could improve consistency across contractors, even financers continue to use different assumptions internally.
- Transparency regarding the escalation rate used in customer disclosure is important particularly where it differs from assumptions used for financing or investment purposes.

Areas of Alignment

- Customer facing escalation rates and financer/investor escalations assumptions may serve different purposes.
- A standardized escalation rate for customer disclosure could improve consistency and comparability.
- Finance companies may continue to apply independent escalation assumptions for validation.
- Clear disclosure of escalation assumptions is important for customer understanding.

Topic 3 Solar Panel Degradation Rate

The working group revisited whether degradation should be standardized and what sources should inform degradation assumptions. The main points were

- Manufacturer spec sheets and warranties
- System-level versus panel level degradation
- Empirical studies and historical performance data

The working group brought up that a single degradation rate may not adequately reflect differences in equipment, technological improvements, and real-world conditions.

Areas of Alignment

- Degradation assumptions should be credible and explainable to customers.
- Manufacturer warranties are a legitimate reference point.
- Degradation should be distinguished from other performance factors.
- Further discussion is required before adopting a standardized degradation approach.

Discussion 2

Topic 1 PowerClerk Inputs and Customer Disclosure Forms

Utilities and stakeholders discussed how information in the customer disclosure form is generated, reviewed, and presented and clarified that:

- System size (DC/AC) and estimated annual year-one production are calculated in PowerClerk based on developer-provided inputs such as equipment specifications, location, and shading.
- PowerClerk does not calculate the starting utility rates, escalation rates, degradation rates, customer payments, or customer savings. These are entered by the developers.
- EDCs review PowerClerk submissions to ensure program compliance but do not calculate or validate customer savings, financing assumptions, or performance guarantees.
- Estimated production values may differ between sales proposals, disclosure forms, and financing documents due to the use of different modeling tools, assumptions regarding system losses and shading, evolving software algorithms, and independent production validation conducted by finance companies.
- Finance companies often apply conservative assumptions tied to performance guarantees, which can result in lower production estimates that those shown in sales-level modeling.
- Utilities do not have visibility into financing contracts or sales-level projections and therefore do not assess the accuracy of financial representations made to customers.

<u>Areas of Alignment</u>

- PowerClerk does not generate or verify customer savings or financial projections.
- Differences in production estimates can be technically justified but may be confusing to customers if not clearly explained.
- Transparency and consistency between sales proposals, disclosure forms, and financing assumptions is important for customer understanding.
- Customers frequently struggle to understand rate terminology, production assumptions, and savings calculations.

Open Issues/Discussions

- No consensus was reached on how to determine the starting utility rate.
    - Based on historical averages
    - Prevailing rates
    - Rate class
    - Utility specific values
    - Customer-specific methodologies
- Further discussion is needed on whether and how third-party supplier rates, LIDR, and other customer discounts should be reflected in the starting utility rate assumptions.

- There is still room for discussion for what methodology should be used to set the utility escalation rate.
- No consensus was reached on whether a single degradation rate should be used, whether rates should be tied to manufacturer warranties, or whether alternative data sources should inform degradation assumptions.
- There are still concerns regarding differences between production estimates shown in sales proposals, disclosure forms, and financing documents and how these are communicated to customers.
- Potential revision of the customer disclosure form to reduce customer confusion.
- It was flagged that there is a need to address how standardized assumptions would apply to projects that include both solar and battery storage.

Action Items and Next Steps

- EOE will distribute meeting summary and agenda for the next working group.
- Working Group Members please respond to the email sent out if you are unable to attend the next CCWG meeting because of the RE+ conference.

Proposals

1. CCWG supports PURA setting a standardized Starting Utility Rate.
2. CCWG supports PURA setting a standardized Utility Escalation Rate.
3. CCWG supports PURA setting a standardized Degradation Rate.

Votes

1. CCWG supports PURA setting a standardized Starting Utility Rate.
    a. Connecticut GreenBank- Yes
    b. ConnSSA- No Vote/Absent
    c. DEEP- No Vote/Absent
    d. Earthlight Tech- Yes
    e. Eversource- Yes
    f. GoodLeap- Yes
    g. Ion Solar- Yes
    h. Ion Solar Pros- No Vote/Absent
    i. OCC- Yes
    j. SAVKAT- Yes
    k. SunRun- No Vote/Absent
    l. Tesla- Yes
    m. Trinity Solar- Yes
    n. UI- Yes but noted that there should be clarification on the utility rate as there should be a difference between this rate and standard service, emphasizing the distribution versus supply components. This is a

standardized comparison rate and there may be challenges educating customers on this.

2. CCWG supports PURA setting a standardized Utility Escalation Rate.
    a. Connecticut GreenBank- Yes
    b. ConnSSA- No Vote/Absent
    c. DEEP- No Vote/Absent
    d. Earthlight Tech- Yes
    e. Eversource- Yes
    f. GoodLeap- Yes
    g. Ion Solar- Yes
    h. Ion Solar Pros- No Vote/Absent
    i. OCC- Yes
    j. SAVKAT- Yes
    k. SunRun- No Vote/Absent
    l. Tesla- Yes
    m. Trinity Solar- Yes
    n. UI- Abstain
3. CCWG supports PURA setting a standardized Degradation Rate.
    a. Connecticut GreenBank- Yes but wants to know the methodology and the breakdown of the rate.
    b. ConnSSA- No Vote/Absent
    c. DEEP- No Vote/Absent
    d. Earthlight Tech- No, similar reasons to CT GreenBank as they support a standardized methodology and open to discussion on how that would be introduced.
    e. Eversource- Yes but also supports a standardized rate that is by module or other methods but supports this method as well.
    f. GoodLeap- Yes but this depends on the methodology used.
    g. Ion Solar- No, they prefer a range with justification for how the rate degradation rate is calculated.
    h. Ion Solar Pros- Yes based on a set of specified equipment and not a broad range for all equipment.
    i. OCC- Yes, assumes that the concerns being presented will be addressed during the methodology process.
    j. SAVKAT- Yes
    k. SunRun- No Vote/Absent
    l. Tesla- No, on the same ground as Ion Solar, they would be interested in a by module or a range approach.
    m. Trinity Solar- No, for the same reasons as previously mentioned and the volatility of obtaining panels today, there needs to be more review.

n. UI- Abstain, needs time for internal deliberation and would like more information as to what exactly the proposal would be.

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DOCKET NO. 25-08-02 : CONTRACTOR COMPLIANCE WORKING GROUP

MEETING NOTES
Meeting #3
Thursday, February 5, 2026
10 am – 12pm ET

Intro

The third CCWG meeting continued discussion with a recap of the existing options for Starting Utility Rates that were submitted by CCWG members prior to the meeting as well as the options shared for Utility Escalation Rate by CCWG members.

Meeting Start Time: 10 am

Participants

Jamie Spannhake (EOE), Amy Heart (Sunrun), Alexander Torrealba (UI), Alex Cruz (Southern CT Gas), Athena Feola (EOE), Brian Rice (Eversource), Michael Bokowski (UI), Carlos Lozano (GoodLeap), Courtney Chester (UI), David Hernandez (UI), Dominic Gatti (Tesla), Dominique Moise- Johnson (UI), Ed Merrick (Ion Solar), Heidi Dragonette (UI), Jacqueline Monsanto (UI), Jim Ferrughelli (SAVKAT), Julia Danahy (Eversource), Mike Trahan (ConnSSA), Katerina Miller (UI), Michael Farrell (Trinity Solar), Nicole Grant (EOE), Sarah Hildebrand (Tesla), Sean Riel (Earthlight Tech), Cornelius Stevenson (UI), Ted Hart (Tesla), Kim White (OCC), Brittany Wyman (EOE), Betsy Scherzer (GoodLeap)

Administrative Items

- Silence during voting will be deemed consent and members are encouraged to explain any objections or concerns during the meeting.
- Any member can make a proposal during this meeting. Should they want to bring it up next meeting, they can send to Brittany.Wyman@ct.gov or Jamie.Spannhake@ct.gov.

Discussion 1

Topic 1 Existing Inputs for Calculating Financial Benefits and Costs and Production Information

Existing inputs for calculating Starting Utility Rate that were submitted by CCWG members included being calculated directly from the customer's historical electric bills over a 12-month period (if available) for homeowner-owned projects. For Third-Party Owned (TPO) projects, one CCWG member reports that the calculation utilizes Genability.

- One member found it interesting that the Escalation Rate came up on the TPO side since it does not affect the year one savings. Direct Ownership should include the escalator rate.
- All CCWG members who submitted information prior to the meeting concluded that 3% per year is the benchmark used for Utility Escalation Rate.
    - One member did note that they did not submit the percentage prior to the meeting, but their company used 4% as an industry standard.
- Discussion regarding a terminology change was brought up and open for comments.
- There is an understanding that the net average monthly savings on the Direct Ownership Customer Disclosure Form is asking for the net average monthly savings over the 20-year period.
- Members discussed making the TPO and Customer Disclosure Form more consistent, suggesting a "yes/no" checkbox to indicate if multi-year savings are being estimated to avoid further customer confusion.
    - This would be if a specific contract does not guarantee long-term savings.

<u>Areas of Alignment</u>

- No comments made as it pertains to the Starting Utility Rate, all seem to agree.
- No comments made as it pertains to Utility Escalation Rate as all CCWG members submitted that 3% is the benchmark that they all use.
- No comments were made regarding a term change.

Topic 2 Existing Calculation Methodologies for Financial Benefits and Costs and Production Information

Existing calculation methodologies for estimated year one net savings and multi-year net savings were discussed as well as potential terminology changes or any extra proposals.

- 5 existing Estimated Year One Net Savings Methodologies submitted prior were discussed ranging from [Baseline Bill – New Bill] to [Production x Annual Utility Rate] (if the annual usage is greater than estimated production).
- Member noted that the estimate calculated in Power Clerk is different than that which is calculated in Aurora.
- 2 existing Estimated Multi-Year Net Savings methodologies:
    - [Baseline Bill – New Bill] where the new bill incorporates the customers estimated annual bill with the proposed solar system; ensuring no negative bills.
    - Net savings over 20 years as a levelized value of cumulative benefit of solar across 240 months.
- Discussion on calculations needing to account for fixed solar payment escalators ranging from 0% - 2.99% typically.
- The Annual Electricity Consumption continues to use actual customer usage over 12 months and allows for additional electrification.
- PV Degradation Rate standard is 0.5% though some carry a rate of 0.25%
- One CCWG submitted information that Annual Solar Production Estimates use solar simulation software that is internal to the company.
    - Both commercially available information and proprietary inputs and modeling.
    - Technical specifications oof the proposed system equipment
    - Production % Customer Usage = Estimated Year 1 Production / Estimated Annual Customer Usage.

<u>Areas of Alignment</u>

- Participants emphasized that post solar utility costs must explicitly include non-bypassable charges.
- Members agreed that a standardized formula is most favored

Topic 3 Improving PowerClerk & Customer Disclosure Forms

Installers have reported that current PowerClerk generations often result in incomplete disclosure forms which require manual edits.

- One member mentions that their company built in the functionality, but the issue still remains that there are some areas that do not populate in the form.
- One member raised a question that it is their understanding that the documents generated from PowerClerk for the reports should be complete per the new program rules.

- One member sees value in adding additional fields in PowerClerk to gather specific information so when the documents are generated, it is all completed before moving onto the customer for signature.
    - Also mentioned that the goal is to standardize the disclosure form and that there is value in collecting the data points in PowerClerk.
- One member raised concerns that if the goal is to move the signatures that are on the disclosure form to the point of sale, the signature is for the customer agreeing that they have reviewed the program manuals, the educational page, etc.

<u>Areas of Alignment</u>

- Overall, the value of collecting data points in PowerClerk may streamline compliance filings, therefor making access to the data and information more readily available to EOE.

Open Issues/Discussions

- Should the TPO Customer Disclosure Form be updated to state “Electricity escalator rate used to estimate net multi-year savings”?
    - Presumably, there is no escalation rate in year one and instead it’s being used to estimate multi-year savings.
- Should the Direct Ownership Customer Disclosure Form be updated as well?
    - One CCWG member concluded that it would make the most sense to include the escalator rate because it will be an aggregate savings over 20 years divided by 240 months.
- Some members reported that Power Clerk generations can sometimes result in incomplete disclosure forms requiring manual edits after the fact.
- Discussion regarding a PV Degradation Rate of 0.5% as a default unless the installer provides specific data from a panel’s specification sheet.
    - Members asked whether this is relevant for TPO agreements with production guarantees, though it remains critical for Direct Ownership.
- Non-bypassable charges (NBC) impact year one solar savings estimates
    - Reduces the total net savings as its factored in as an additional cost that lowers the overall year-one net savings.
    - One member noted that the NBC is multiplied by the total electricity production to determine what the customer must pay.
- Consistency regarding terminology would be useful
    - Electricity Rate or Post-Solar Costs should be clearly defined as either including or excluding the non-bypassable charges to avoid further consumer confusion.

Action Items and Next Steps

- EOE will review any proposals submitted and previous discussion to formulate new proposals to bring forth at the next meeting.
- The next meeting is **Friday February 13, 2026**, not Thursday due to holiday.

Proposals

N/A

Votes

N/A

STATE OF CONNECTICUT

PUBLIC UTILITIES REGULATORY AUTHORITY

OFFICE OF EDUCATION, OUTREACH, & ENFORCEMENT

Docket NO. 25-08-02: Contractor Compliance Working Group

MEETING NOTES

Meeting #4

Thursday, February 13th, 2026

10 am – 12pm ET

Intro

The fourth CCWG meeting continued discussion from prior meetings on potential standardization of key assumptions used in customer facing solar proposals and the PURA approved customer disclosure form. Topics introduced disclosure form timing, standardized electricity rate escalator assumptions, starting utility rate methodology, annual electricity consumption inputs, and PowerClerk data processes. Terminology-related proposals were introduced but tabled pending further methodological development. Additional topics, including PV degradation rates, were deferred due to time constraints.

Meeting Start Time: 10 am

Participants

Jamie Spannhake (EOE), Athena Feola (EOE), Katherine von Steinman (EOE/DOE Fellow), Brittany Wyman (EOE), Todd Carew (Ion Solar Pros), Dominique Moise-Johnson (UI), Michael Bokowski (UI), Sergio Carrillo (CBG), Julia Danahy (Eversource), Sara Pyne (CGB), Amir Yazdi (SEIA), Sean Riel (Earthlight), Kim White (OCC), Dominic Gatti (Tesla), Ted Hart (Tesla), Alexandra Torrealba (UI), Kyle Wallace (SunRun), Carlos Lozano (GoodLeap), Heidi Dragonette (UI), Jacqueline Monsanto (UI), Katerina Miller (UI), Cornelius Stevenson (UI), Michael Farrell (Trinity Solar), Eric Annes (DEEP)

Administrative Items

- Reminder that silence is deemed consent unless objections are raised. Members are encouraged to explain any objections of concern during the meeting.
- Absence is deemed consent, however the member's absence will be noted in the report.
- Review of prior preliminary proposal votes.
    - CCWG supports PURA setting a standardized Starting Utility Rate.

        - 100% consensus YES (4 absent)
    - CCWG supports PURA setting a standardized Utility Escalation Rate.
        - Consensus YES (4 absent), with one abstention
    - CCWG supports PURA setting a standardized Degradation Rate.
        - Non-consensus 7 YES (3 absent); 4 NO; 1 abstain

Discussion

Topic 1 Timing of the Disclosure Form Level Setting

The Authority has concluded that disclosure forms must be executed before the customer signs a solar installation contract to ensure that all customers have access to the required information and disclosures before entering into a solar installation contract. The Authority also found it preferable to adjust the timing of the existing Customer Disclosure Form rather than create a sperate form with overlapping information. However, the CCWG may submit a recommended separate pre-contract disclosure form in its report.

<u>Discussion on operational workflow</u>

- Sales proposals and contracts are typically generated through contractor systems rather than PowerClerk.
- Sales personnel generally do not have access to PowerClerk as operations teams handle interconnection applications.
- Participants emphasized that disclosure forms should be generated outside of PowerClerk and then uploaded to ensure consistency with operational processes.
- Disclosure forms may be electronically generated through CRM or DocuSign systems using existing proposal data.
- PowerClerk serves as a meeting point rather than an origin of disclosure forms.

<u>Additional clarifications</u>

- Proposals and contract stages are distinct; proposals may require minimal information, whereas contracts follow detailed system designs.
- Disclosure forms are intended to summarize key information, so customers are fully informed at the time of contract execution.
- Handwritten forms remain permissible but increase the risk of transcription errors when later entered into PowerClerk.

Areas of Alignment

- Follow the Authorities' directions to provide the PURA-approved customer disclosure form immediately prior to the contract execution.
- Contractors may generate disclosure forms outside PowerClerk provided the approved form is used without modification,
- Sales teams should not be required to access utility portals to generate disclosure forms.
- Disclosure forms function as simplified summaries of contract information for customer transparency.

Topic 2 Standardized Electricity Rate Escalator (%)

Prior discussion on this topic has centered around using either a maximum or mandatory escalator rate, how many years should be used in the historical average, and what is the basis for the 3% rate used by most of the CCWG members.

- PURA currently calculates annual electricity growth rates.
- Potential standardization approaches included:
    - Using PURA's calculated annual escalator
    - Historical average over a defined timeframe (10, 15, or 20 years)
    - EIA data (state or national)
- Participants emphasized the need for substantiating projections used in marketing and disclosures.
- Rounding methodology discussed (one decimal point)
- Debate regarding
    - Maximum vs mandatory escalation rates
    - Utility specific vs statewide rates
    - Conservatism to avoid overstating saving projections.

Areas of Alignment

- Escalation rates should be defensible and substantiated.
- Standardization could improve consistency across contractors.
- Annual updates may be appropriate.
- Transparency and clarity for customers is crucial.

Topic 3 Methodology for Determining Starting Rate

The purpose of the Starting Rate is to calculate the estimated net one year and multiyear savings. The guiding questions for this topic were

- Using either the average historical rate or using one point such as the prevailing rate. Should the actual customer rate be used when possible or a standardized

rate possibly set by PURA annually? This rate could be PURA's all-in retail electricity rate for each EDC as calculated in the annual RRES docket.
- What software is currently used?
- An all-in standardized rate or a partial standardized plus customers actual annual average for some portion of electricity costs.
- What if two options were offered/required for each customer?

Key considerations

- Customer-specific usage patterns can materially change calculated weighted rates.
- Third-party suppliers and low-income discounts introduce variability.
- Forecasted rates may not accurately reflect real-time volatility.

Discussion surrounded whether

- A standardized rate should be adopted, or
- A standardized methodology should be required instead.

Areas of Alignment

- Methodology must be transparent and explainable to customers.
- Forecasted rates may introduce risk to overstated savings.
- Customer-specific factors are important but introduce complexity.

Topic 4 Annual Electricity Consumption (kWh)

Past discussions focused on a couple of topics

- The terminology used, proposing terminology such as "customers estimated annual electricity usage? Consumption?"
- Actual customer usage over the prior 12 months based on customers utility bills and if a full 12 months of data is not available then how should estimates be made?
- Factoring in the allowable increase in annul usage from the customer based on the allowable electrification measures.
- Other changes based on discussions with customers regarding expected additions to usage.

Key discussions

- Use of actual prior 12-month usage where available
- When less than 12 months exists
    - Estimates based on available data, home characteristic, or modeling platforms

- Concerns raised regarding underestimating consumption, particularly where electrification or behavioral changes occur.

Areas of Alignment

- Actual historical usage is preferred when available.
- Standardized guidance needed for incomplete usage history.
- Behavioral and electrification impacts should be considered.

Open Issues/Discussions

- No consensus was reached on methodology for determining the starting electricity rate, including treatment of customer-specific variables and third-party supplier rates.
- Further discussion is required for standardization of electricity rate escalation assumptions, including alignment with financing assumptions and the annual update process.
- Terminology updates to customer disclosure forms were tabled pending resolution of underlying methodologies,
- Ongoing concerns regarding customer understanding of disclosure form terminology, production assumptions, and savings calculations.

Action Items and Next Steps

- Next meeting will pick up with discussion on PV degradation rates.
- Please email any topics you would like to discuss to either Jamie or Brittany for the next meeting.
- Any member can make a proposal for voting, during the meeting, or before the meeting via email to Jamie and Brittany.

Proposals

1. “CCWG supports a terminology change from ‘Starting Utility Rate’ to ‘Starting Average Electricity Rate’ in Customer Disclosure Documents (Direct Ownership & Third Part Owner) and Compliance Filing Documents in Docket No. 2X-08-02RE01.”
2. “CCWG supports a terminology change from ‘Escalator Rate’ to ‘Electricity Rate Escalator’ in Customer Disclosure Documents (Direct Ownership & Third-Party Owned) and Compliance Filing Documents in Docket No. 2X-08-02RE01.”
3. Annual Production as a % of Annual Customer Usage
    3.1 “CCWG a terminology change from ‘estimated annual utility customer usage’ to ‘customer’s estimated annual electricity usage’ in Compliance Filing Documents in Docket No. 2X-08-02RE01.”

3.2 “CCWG supports the following methodology for calculating ‘estimated year one production (kWh) as a percentage of customer’s estimated annual electricity usage (kWh)”: Estimated Year 1 Production (kWh) / Estimated Annual Electricity Usage (kWh).

These proposals were tabled for future discussion. Participants agreed that terminology updates should follow decisions on underlying methodologies to avoid adopting language that may imply a specific calculation approach prior to finalization.

Concerns raised included

- Terminology potentially signaling methodology before one is approved.
- Risk of customer confusion if terminology changes precede structural decisions.
- Need for additional review, including potential communications input.
- Desire to ensure terminology aligns with both customer-facing clarity and regulatory consistency.

Votes

No votes were conducted during this meeting.

STATE OF CONNECTICUT

PUBLIC UTILITIES REGULATORY AUTHORITY

OFFICE OF EDUCATION, OUTREACH, & ENFORCEMENT

Docket NO. 25-08-02: Contractor Compliance Working Group

MEETING NOTES

Meeting #5

Thursday, February 19th, 2026

10 am – 12pm ET

Intro

This meeting continued discussion from the prior meeting on PV degradation rate standardization, methodologies for estimating year one and muti-year net savings, and annual solar production estimates. The group also reviewed draft proposals to vote on at the next meeting.

Meeting Start Time: 10 am

Participants

Jamie Spannhake (EOE), Brittany Wyman (EOE), Nicole Grant (EOE), Katherine von Steinman (EOE/DOE Fellow), Jim Ferrughelli (SAVKAT), Todd Carew (Ion Solar Pros), Dominique Moise-Johnson (UI), Heidi Dragonette (UI), Sean Riel (Earthlight), Katerina Miller (UI), Kim White (OCC), Kyle Wallace (SunRun), Brian Rice (Eversource), Dominic Gatti (Tesla), Sara Pyne (CGB), Cornelius Stevenson (UI), Sergio Carrillo (CGB), Sara Hildebrand (Tesla), Ted Hart (Tesla), Jacqueline Monsanto (UI), Michael Bokowski (UI), Carlos Lozano (GoodLeap), Ed Merrick (Ion Solar), Julia Danahy (Eversource), David Hernandez (UI)

Administrative Items

- Reminder that silence is deemed consent unless objections are raised. Members are encouraged to explain any objections or concerns during the meeting.

Discussion

Topic 1 PV Degradation Rate

Key Discussions

- Degradation rate refers to panel-level degradation, with system production assumptions derived from panel degradation.

- Many contractors currently use 0.4%-0.5% degradation in modeling.
- Many customers owned systems often reply on the manufacturing spec sheets and warranty degradation rates.
- TPO systems frequently use standardized degradation rates tied to performance guarantees.
- Concerns were raised that listing standardized degradation rate on the customer disclosure form may create confusion if it differs from the panel specific rate selected by the customer
- Some members noted that differences between 0.4% and 0.5% degradation may not materially impact lifetime savings.
- NREL data was discussed as a potential third-party source for a standardized degradation rate.
- Questions were raised regarding whether degradation rate should appear on the customer disclosure form.
- FEOC compliance was discussed primarily as affecting panel availability rather than calculation methodology.

Areas of Alignment

- Degradation rate refers to panel degradation, not full system degradation.
- Manufacturer spec sheets generally provide the basis for panel degradation rates.
- Degradation rates primarily impact multi-year savings calculations rather than year one savings.
- Further discussion is needed before determining whether a standardized rate should be adopted.

Topic 2 Estimated Multi-Year Net Savings

Key Discussions

- Two primary calculation methods were discussed:
    - Pre-solar bill minus post-solar bill
    - Pre-solar cost minus post-solar costs plus solar costs
- The second methodology was viewed as clear because it incorporates solar payments.
- Interpretation of “estimated year one net savings” varies across contractors.
- Treatment differs depending on financing structure:
    - TPO systems may include escalators and performance guarantees.
    - Loan and cash systems may require different treatment
- For cash purchases, inclusion of total system cost may result in negative year one net savings.

- REC ownership affects calculation of net savings.
- Discussion to include whether annual savings may be more appropriate than monthly averages on the customer disclosure form.
- Potential inclusion of annual usage on the disclosure form was discussed
- Muli-year net savings are generally calculated using:
    - Year one net savings
    - Electricity escalation rate
    - PV degradation rate
    - Financing escalators (where applicable)

Areas of Alignment

- Greater clarity and consistency in methodology would improve customer comparability
- Financing structure significantly affects savings presentation.
- Annual values may be clearer for customers than monthly averages,
- Transparency regarding assumptions is important.

Topic 3 Annual Solar Production Estimates

Key Discussions

- Most contractors rely on solar simulation software (Aurora, PVWatts, proprietary tools).
- PowerClerk can calculate production estimates based on entered equipment, location, and shading.
- Production estimates depend on modeling inputs including:
    - Panel specifications
    - Location
    - Shading
    - System losses
- Financing providers may require standardized modeling inputs
- Variability may exist across software platforms and input assumptions

Areas of Alignment

- Solar production estimates are software based and reply on standard technical inputs.
- Standardizing a specific software platform may not be practical.
- Transparency regarding methodology and inputs is important

Topic 4 Proposals

EOE introduced draft proposals based on prior discussions. Voting will occur at the next meeting to allow members time to review and have internal discussions before voting.

Open Issues/Discussions

- Whether to adopt a standardized PV degradation rate or standardized mythology.
- Clarification of the definition and calculation of (Estimates Year One Net Savings)
- Potential revisions to Customer Disclosure Forms, including presentation of annual vs. monthly savings.
- Consideration of including annual usage on disclosure forms
- Determination of appropriate inputs for solar productions estimates

Action Items and Next Steps

- Members to review and consult internally regarding draft proposals
- Additional feedback submitted prior to the next meeting to Jamie and Brittany
- Voting will be held on the proposals presented at the next meeting
- Any members can make a proposal for voting, during the meeting, or before the meeting via email to Jamie and Brittany

Proposals

1. Average Starting Utility Rate
    a. The Average Starting Utility Rate ($0.00/kWh) used in the Customer Disclosure Forms and in Contractor Compliance filings will be PURA's all-in retail electricity rate for each EDC as set in the Annual RRES Docket No. 2X-08-02 for the following calendar year.
    b. If a contractor wishes to provide a customer-specific average starting utility rate to provide an optional, additional calculation of net savings, the following standard methodologies must be used:
        i. For customers with 12-months of usage, the customer-specific average starting utility rate must be the average all-in utility rate over the past twelve months of actual usage based on the customer's utility bills.
        ii. For customers with less than 12-months of usage, the contractor may use any reasonably accurate methodology and must explain in writing to the customer and in compliance filings the methodology used for calculating such rate. If software is used, the contractor must explain in writing to the customer and in compliance filings the methodology used by the software.

2. Utility Escalation Rate
    a. The Utility Rate used in the Customer Disclosure Forms and in Contractor Compliance filings will be the retail electricity escalation rate set by PURA in the Annual RRES Docket No. 2X-08-02 for the following calendar year.
3. Customers Annual Electricity Usage
    a. To calculate the Customer's Annual Electricity Usage,
        i. The following standard methodologies must be used:
        ii. For customers with 12-months of usage at the property at which the system is being installed, it is the customer's actual usage over the prior 12 months based on the customer's utility bills.
        iii. For customers with less than 12-months of usage at the property at which the system is being installed, the contractor may use any reasonably accurate methodology and must explain in writing to the customer and in compliance filings the methodology used for calculating. If software is used, the contractor must explain in writing to the customer and in compliance filings the methodology used by the software.
    b. PLUS, any allowable additional electrification measures as provided for in the RRES Program Manual for the applicable year in which the Customer Disclosure Form is generated and signed.
        i. E.g. 1 Electric Vehicle: 3285 kWh; 2 Electric Vehicles: 6570 kWh; etc.

Votes

Votes will be taken during the next meeting.

STATE OF CONNECTICUT

PUBLIC UTILITIES REGULATORY AUTHORITY

OFFICE OF EDUCATION, OUTREACH, & ENFORCEMENT

Docket NO. 25-08-02: Contractor Compliance Working Group

MEETING NOTES

Meeting #6

Thursday, February 26th, 2026

10 am – 12pm ET

Intro

This meeting focused on the proposals presented at the last meeting where members were able to cast their votes and voice any concerns they had. These proposals included the Average Starting Utility Rate, the Utility Escalation Rate, and the Customers Annual Electricity Usage. There were also additional proposals introduced by SunRun and other members for potential voting at the next meeting.

Meeting Start Time: 10 am

Participants

Jamie Spannhake (EOE), Brittany Wyman (EOE), Nicole Grant (EOE), Katherine von Steinman (EOE/DOE Fellow), Kim White (OCC), Dominique Moise-Johnson (UI), Jim Ferrughelli (SAVKAT), Michael Farrell (Trinity Solar), Eric Annes (DEEP), Todd Carew (Ion Solar Pros), Cornelius Stevenson (UI), Sara Pyne (CGB), Ted Hart (Tesla), Sara Hildebrand (Tesla), Ed Merrick (Ion Solar), Dominic Gatti (Tesla), Sergio Carrillo (CGB), Brian Rice (Eversource), Michael Bokowski (UI), Chelsae Farrell (Trinity Solar), Sean Riel (Earthlight), Kyle Wallace (SunRun), Margie Ramirez (Eversource), Jacqueline Monsanto (UI), Heidi Dragonette (UI), Alexandra Torrealba (UI), Carlos Lozano (GoodLeap), Amir Yazdi (SEIA), David Hernandez (UI), Katerina Miller (UI)

Administrative Items

- Reminder that silence is deemed consent unless objections are raised.
- Members are responsible for voicing objections and concerns during discussion.
- Voting conducted publicly in alphabetical order (Yes/No/Abstain, with explanation for no or abstain votes)

Discussion on Proposals for Voting

Topic 1 Average Starting Utility Rate

Key Discussions

- Clarification that the standardized rate would be PURA's all-in retail electricity rate as set by PURA in the Annual RRES Docket.
- Purpose of standardization: allow customers to compare proposals using consistent assumptions.
- Optional customer-specific calculations may be provided outside the standardized disclosure form.
- Clarification that standardized rate would appear on Customer Disclosure Form; optional calculation may be included separately.

Areas of Concern

- Use of supplier-specific rates
- Risk of inflated savings projections
- Potential customer confusion with multiple rate figures
- Administrative burden of compliance
- Alignment with RRES Program Manual

Areas of Alignment

- General agreement that consistency and transparency are important.
- Recognition that supplier specific rates may introduce variability and risk.
- Agreement that Customer Disclosure Form should not be misleading.

Topic 2 Utility Escalation Rate

Key Discussions

- Proposed escalation rate: PURA-set retail electricity escalation rate (currently 2.5%)
- Discussion regarding 16-year lookback period used in current calculation.
- Clarified that current proposal reflects PURA's existing methodology.

Areas of Concern

- Preference for 20-year historical term (align with RRES term)
- Whether escalation should be utility specific
- Whether EIA data should be considered
- Rate drivers over time and equity concerns

Areas of Alignment

- Recognition that escalation rate should be based on historical data.
- Agreement that multi-year savings require consistent escalation assumptions.
- Several members expressed openness to modifying lookback period.

Topic 3 Customer's Annual Electricity Usage

Key Discussions

- Proposal requires use of actual 12-month historical usage when available.
- If less than 12 months is available, contractor must use a reasonably accurate methodology and disclose the calculation method.
- Allowable additional electrification measures may be included per RRES Program Manual
- Minor concerns raised regarding interpretation of "reasonably accurate methodology."

Areas of Alignment

- Broad agreement that 12-month historical usage is appropriate baseline.
- Agreement that electrification adders should remain aligned with RRES Manual.
- General support for clarity of proposal structure.

Open Issues/Discussions

- 16-years vs. 20-year escalation methodology
- Blended vs. utility-specific escalation rates
- Standardized vs. customer specific rate tension
- Treatment of non-bypassable charges
- Disclosure form alignment with RRES Manual
- Definition of "reasonably accurate methodology"

Action Items and Next Steps

- Members to submit alternative escalation methodology proposals.
- Earthlight to provide 20-year historical data references.
- EOE to prepare refinements to degradation and savings methodologies.
- Voting on PV Degradation Rate and additional proposals scheduled for next meeting.
- SunRun to submit any changes to their current proposals.

Proposals from EOE for Voting this Meeting

1. Average Starting Utility Rate
    a. The Average Starting Utility Rate ($0.00/kWh) used in the Customer Disclosure Forms and in Contractor Compliance filings will be PURA's all-in retail electricity rate for each EDC as set in the Annual RRES Docket No. 2X-08-02 for the following calendar year.
    b. If a contractor wishes to provide a customer-specific average starting utility rate to provide an optional, additional calculation of net savings, the following standard methodologies must be used:
        i. For customers with 12-months of usage, the customer-specific average starting utility rate must be the average all-in utility rate over the past twelve months of actual usage based on the customer's utility bills.
        ii. For customers with less than 12-months of usage, the contractor may use any reasonably accurate methodology and must explain in writing to the customer and in compliance filings the methodology used for calculating such rate. If software is used, the contractor must explain in writing to the customer and in compliance filings the methodology used by the software.
2. Utility Escalation Rate
    a. The Utility Rate used in the Customer Disclosure Forms and in Contractor Compliance filings will be the retail electricity escalation rate set by PURA in the Annual RRES Docket No. 2X-08-02 for the following calendar year.
3. Customers Annual Electricity Usage
    a. To calculate the Customer's Annual Electricity Usage,
        i. The following standard methodologies must be used:
        ii. For customers with 12-months of usage at the property at which the system is being installed, it is the customer's actual usage over the prior 12 months based on the customer's utility bills.
        iii. For customers with less than 12-months of usage at the property at which the system is being installed, the contractor may use any reasonably accurate methodology and must explain in writing to the customer and in compliance filings the methodology used for calculating. If software is used, the contractor must explain in writing to the customer and in compliance filings the methodology used by the software.
    b. PLUS, any allowable additional electrification measures as provided for in the RRES Program Manual for the applicable year in which the Customer Disclosure Form is generated and signed.

i. E.g. 1 Electric Vehicle: 3285 kWh; 2 Electric Vehicles: 6570 kWh; etc.

Proposal from EOE for Voting at Next Meeting

4. PV degradation Rate (%)
    a. The default PV degradation rate to be used on Customer Disclosure Forms and in Contractor Compliance Filings will be the average degradation rate as determined by ISO-NE in its most recent NREL Annual Report with its most recent analysis of PV lifetime performance, to one decimal point.
        i. Currently, the ISO-NE most recent report is PV Lifetime Project - 2024 NREL Annual Report, which finds an average degradation rate of 0.46% across all panels it tested.
        ii. Rounded to one decimal point, the current default PV degradation rate is 0.5% 2.
    b. If a contractor wishes to provide a panel-specific PV degradation rate as an optional, additional rate, the panel specification sheet and associated warranty for the panel selected by the customer may be used so long as the degradation rate is calculated from the linear power output of the panel as stated in the specification sheet & associated warranty as follows:
        i. (Year 1 nameplate rating – Year 25 nameplate rating)/24 years

Additional Proposals from SunRun and Others

1. The Average Starting Utility Rate used in Customer Disclosure Forms and in the Contractor Compliance filings will be a 12-month average historical utility rate for the utility or the average historical utility rate for the prior calendar year.
    a. Contractors may choose to display the Average Starting Utility Rate with the non- bypassable charge subtracted from the utility rate to display the “avoided cost of power” provided by the solar system.
    b. Regardless of whether the contractor subtracts the non-bypassable charge from the starting utility rate, the non-bypassable charge must be included in the calculation of net savings for the customer.
    c. If the contractor wishes to provide a customer-specific average starting utility rate to provide an optional, additional calculation of net savings, the following standard methodologies must be used:
        i. For customers with 12 months of usage, the customer-specific average starting utility rate must be the average all-in utility rate over the past twelve months of actual usage based on the customer’s utility bills.

ii. For customers with less than 12 months of usage, the contractor may use any reasonably accurate methodology and must explain in writing to the customer and in compliance filings the methodology used for calculating such rate. If software is used, the contractor must explain in writing to the customer and in compliance filings the methodology used by the software.

2. The utility escalation rate used in the Customer Disclosure Forms and in Contractor Compliance filings may be no greater than the 20-year historical compound annual growth rate for Connecticut based on EIA data (or EDC reported data that is used for PURA's annual review).
    a. Alternate Proposal: The utility escalation rate used in the Customer Disclosure Form and in Contractor Compliance Filings must be 3%.
3. The default PV degradation rate used in multi-year savings estimates is .5%. If a contractor wants to use an alternative degradation rate then it must be substantiated by the manufacturer's data sheet, explained in writing to the customer and in the Contractor Compliance filing in the Financial Benefits Narrative document.

Proposals from EOE for Discussion

1. Estimated Year One Net Savings stated in the Customer Disclosure Form and Contractor Compliance filings will be calculated as follows:
    a. [Pre-Solar Utility Costs] - [Post-Solar Utility Costs] + [Solar Cost] = Estimated Year One Net Savings
    b. Pre-Solar Utility Costs = [Customer's Annual Electricity Usage] * [Average Starting Utility Rate]
    c. Post-Solar Utility Costs = [Customer's Annual Electricity Usage – Estimated Year One Production] * [Average Starting Utility Rate + Solar Production Charge]
    d. Solar Cost =
        i. For Direct Owned without financing: cost of the system
        ii. For Direct Owned with financing: total of payments in Year One
        iii. For Third-Party Owned: total of payments in Year One
    e. Note to customer that this does not include the value of RECs, if any
2. (Estimated Multi-Year Net Savings are not required.) If a contractor provides estimated multi-year net savings, it must be calculated as follows:
    a. Start with Estimated Year One Net Savings
    b. Adjust the estimated year one net savings over the years by the default PV degradation rate and the default utility escalation rate.
    c. For financed and third-party owned systems, also include any escalations of payments and other financial terms over the years.

Votes

1. Average Starting Utility Rate
    a. CT Green Bank- Yes
    b. ConnSSA- Absent
    c. DEEP- Not Voting
    d. Earthlight Tech- No
    e. Eversource- No
    f. GoodLeap- No
    g. Ion Solar- No
    h. Ion Solar Pros- No
    i. OCC- No
    j. SAVKAT- No
    k. SEIA- Abstain
    l. SunRun- No
    m. Tesla- Yes
    n. Trinity Solar- No
    o. UI- No

<u>Concerns Raised</u>

- Concerns that supplier-specific rates may inflate savings projections.
- Concern that allowing customer specific calculations undermines standardization.
- Risk of customer confusion from multiple rate figures.
- Questions about methodology (seasonal weighting, real-time accuracy).
- Potential misalignment with RRES Program Manual.

2. Utility Escalation Rate
    a. CT Green Bank- Yes
    b. ConnSSA- Absent
    c. DEEP- Not Voting
    d. Earthlight Tech- No
    e. Eversource- Yes
    f. GoodLeap- Yes
    g. Ion Solar - No
    h. Ion Solar Pros- No
    i. OCC- Yes
    j. SAVKAT- Yes
    k. SEIA- Abstain
    l. SunRun- No

m. Tesla- No
n. UI- No

Concerns Raise

- Objection to 16-year lookback; preference for 20-year alignment with RRES term.
- Concern over blended vs. utility-specific escalation rates.
- Questions about historical data sources and methodology.
- Desire for flexibility to use lower escalation rates.

3. Customer's Annual Electricity Usage
    a. CT Green Bank- Yes
    b. ConnSSA- Absent
    c. DEEP- Not Voting
    d. Earthlight Tech- Yes
    e. Eversource- Yes
    f. GoodLeap- Yes
    g. Ion Solar- Yes
    h. Ion Solar Pros- Yes
    i. OCC- Yes
    j. SAVKAT- Yes
    k. SEIA- Yes
    l. SunRun- Yes
    m. Tesla- Yes
    n. Trinity Solar- Yes
    o. UI- No

Concerns Raised

- Clarification requested on "reasonably accurate methodology."
- Concern regarding how utilities would review and accept alternative methods.

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OFFICE OF EDUCATION, OUTREACH, & ENFORCEMENT

Docket NO. 25-08-02: Contractor Compliance Working Group

MEETING NOTES

Meeting #7

Wednesday March 4th, 2026

1 pm – 3 pm ET

Intro

This meeting is being held to review the proposals set forth by EOE and CCWG members from the previous meeting (Meeting #6) and to continue discussions of other issues. The voting will occur during this time, and you may vote yes to multiple proposals on the same topic as we are putting forth all proposals to the Authority.

Meeting Start Time: 1 pm

Participants

Jamie Spannhake (EOE), Brittany Wyman (EOE), Athena Feola (EOE), Kim White (OCC), Dominique Moise-Johnson (UI), Jim Ferrughelli (SAVKAT), Michael Farrell (Trinity Solar), Eric Annes (DEEP), Sara Pyne (CGB), Sara Hildebrand (Tesla), Ed Merrick (Ion Solar), Sergio Carrillo (CGB), Michael Bokowski (UI), Sean Riel (Earthlight), Kyle Wallace (SunRun), Jacqueline Monsanto (UI), Heidi Dragonette (UI), Alexandra Torrealba (UI), Amir Yazdi (SEIA), David Hernandez (UI), Katerina Miller (UI), Heather Tebbetts (UI), Betsy Scherzer (GoodLeap), Julia Danahy (Eversource), Josh Kaplan (EOE)

Administrative Items

- Reminder that silence is deemed consent unless objections are raised.
- Members are responsible for voicing objections and concerns during discussion.
- Voting conducted publicly in alphabetical order (Yes/No/Abstain, with explanation for no or abstain votes)

Discussion on Proposals for Voting

Topic 1 PV Degradation Rate – Customer Disclosure Forms and Contractor Compliance Filings

Key Discussions

- No questions, comments, or concerns were raised by members on this topic.

Topic 2 PV Degradation - Add Additional Language to Above Proposal

Key Discussions

- No questions, comments, or concerns were raised by members on this topic.

Topic 3 PV Degradation Rate – Used in Multi-Year Savings Estimates

Key Discussions

- Presented and discussed by SunRun.
- This proposal is to use 0.5% as a default.
- If a contractor wanted to use a different rate, they could, however it would replace the 0.5% and not be in addition.
- No questions, comments, or concerns were raised by members on this topic.

Topic 4 Average Starting Utility Rate (%)

Key Discussions

- Presented and discussed by SunRun and Earthlight.
- Same proposal as Meeting #6 by EOE, however it clarified that the basic service supply rate would be used and not supplier specific rates.

Areas of Concern

- One member raised a question about what the weighted average rate would be and why it is weighted.
- Many members were confused with the terminology used and how the non-bypassable charge being separate played a role.

Areas of Alignment

- All members agreed to table this proposal for future consideration once specific language is worked through and/or changed.

Topic 5 Utility Escalation Rate (Years)

Key Discussions

- Presented and discussed by SunRun.
- This would be set by PURA not something the contractors would calculate.
- The difference between Meeting 6 proposal is that this is for 20 years and has the language of no greater than.
- The 20 years were chosen to match the RRES Tariff term.

Areas of Alignment

- No questions, comments, or concerns were raised by members on this topic.

Topic 6 Utility Escalation Rate (%)

Key Discussions

- No questions, comments, or concerns were raised by members on this topic.

Open Issues Listed in the Meeting Slides

- Annual Solar Production
- Changes to Customer Disclosure Forms
    - Add Yes/No checkbox for “Are multi-year savings estimates provided?”
    - TPO Customer Disclosure Form, change “Escalator rate used to estimate net ***year one*** savings” to “***Utility*** escalator rate used to estimate net ***multi-year*** savings”.
    - For Direct Ownership Customer Disclosure Form, change:
        - “Estimated net ***average monthly*** savings ($)” to “Estimated ***Year One*** Customer Net Savings”
        - “Starting Utility rates used to estimate net ***average monthly*** savings” to “Starting utility rate used to estimate ***Year One*** Customer Net Savings”
        - “Escalator rate used to estimate net ***average monthly*** savings” to “***Utility*** escalator rate used to estimate net ***multi-year*** savings”.
    - Add Definitions/Terms section, or footnotes with explanations for calculation methodologies
- Changes to PowerClerk

Additional Issues Discussed

- Timing of presentation of Customer Disclosure Form to customers

    - Best approach is to have it be a part of the contract and/or presented along with the contract.
- Energy storage program disclosure forms and calculations
- Successor program(s) to RRES

Action Items and Next Steps

- Members to submit any additional proposals for discussion.
- All members should remember to review the proposals on the agenda distributed before the meeting.

Proposals from EOE for Voting this Meeting

4.1 PV Degradation Rate – Customer Disclosure Forms and Contractor Compliance Filings

a. The rate to be used on Customer Disclosure Forms and in Contractor Compliance Filings will be set by PURA.

i. Will be determined by ISO-NE in its most recent NREL Annual Report with its most recent analysis of PV lifetime performance, to one decimal point (tenths).

4.2 PV Degradation Rate – Additional Language to be added to Proposal 4.1

a. A contractor may wish to provide a panel-specific PV degradation rate as an optional, additional degradation rate.

i. The panel specification sheet and associated warranty for the panel selected by the customer may be used so long as the degradation rate is calculated from the linear power output of the panel as stated in the specification sheet and associated warranty:

$$\frac{(Year\ 1\ Nameplate\ Rating - Year\ 25\ Nameplate\ Rating)}{24\ Years}$$

Proposals from SunRun and Other CCWG Member(s) for Voting this Meeting

5. PV Degradation Rate – Multi-Year Savings Estimates

a. The default PV degradation rate used in multi-year savings estimates is 0.5%

i. If a contractor wants to use an alternative rate, it must be:

1. Substantiated by the manufacturer's data sheet
2. Explained in writing to the customer
3. Explained in the Contractor Compliance filing within the Financial Benefits Narrative Document.

6. Average Starting Utility Rate (%)
    a. The average starting utility rate used in the Customer Disclosure Forms and the Contractor Compliance filings will be either a 12-month rolling average historical utility rate at the time the disclosure form is completed **or** the average historical utility rate for the prior calendar year that is set by PURA in the Annual Review Docket 2X-08-02.
        i. Contractors may display the rate with the non-bypassable charge subtracted from the utility rate to show the "avoided cost of power" provided by the solar system.
        ii. The non-bypassable charge **must** be included in the calculation of net savings to the customer.
        iii. Contractors that provide a customer-specific average starting utility rate to provide an optional, additional calculation of netsavings on any sales or marketing materials **must** follow the standard methodologies:
            1. For customers with 12 months of usage, the customer specific average starting utility rate must be the average all-in utility rate over the past twelve months of actual usage base don the customer's utility bills. The utility rate must use the basic service supply rate and not a third-party supplier rate for the applicable months.
            2. For customer with less than 12 months of usage, the contractor may use any reasonably accurate methodology and must explain in writing to the customer and in compliance filings the methodology used for calculating such a rate. If software is used, the contractor must explain in writing to the customer and in compliance filings the methodology used by the software.
7. Utility Escalation Rate (%)
    a. The utility escalation rate used in the Customer Disclosure Forms and in Contractor Compliance filings may be **no greater** than the 20-year historical compound annual growth rate for Connecticut set by PURA in the Annual Review Docket 2X-08-02, based on the EDC reported data.
8. Utility Escalation Rate (%)
    a. The utility escalation rate used in the Customer Disclosure Forms and in Contractor Compliance filings **must** be 3%.

Proposals from EOE for Discussion and/or Voting at Next Meeting

1. Estimated Year One Net Savings stated in the Customer Disclosure Form and Contractor Compliance filings will be calculated as follows:

a. [Pre-Solar Utility Costs] - [Post-Solar Utility Costs] + [Solar Cost] = Estimated Year One Net Savings
    i. Pre-Solar Utility Costs = [Customer's Annual Electricity Usage] * [Average Starting Utility Rate]
    ii. Post-Solar Utility Costs = [Customer's Annual Electricity Usage – Estimated Year One Production] * [Average Starting Utility Rate + Solar Production Charge]
    iii. Solar Cost =
    iv. For Direct Owned without financing: cost of the system
    v. For Direct Owned with financing: total of payments in Year One
    vi. For Third-Party Owned: total of payments in Year One
    vii. Note to customers that this does not include the value of RECs, if any
2. (Estimated Multi-Year Net Savings are not currently required.) If a contractor provides estimated multi-year net savings, it must be calculated as follows:
    a. Start with Estimated Year One Net Savings
    b. Adjust the estimated year one net savings over the years by the default PV degradation rate and the default utility escalation rate.
    c. For financed and third-party owned systems, also include any escalations of payments and other financial terms over the years.

Discussion on EOE Proposals

1. Estimated Year One Net Savings
    - One member suggests there should be a distinction made for customer types who would directly benefit from the value of the RECs to be able to show customers this as a part of their savings (i.e., incentive groups).
    - One member expressed concern that calculating estimated year one net savings by including solar costs when a customer purchases the system outright would result in showing a large loss in year one, which could deter people from purchasing systems. In this scenario, it might be better to not include solar costs in the calculations, or to ensure that a multi-year net savings is provided to customers who purchase their solar system outright.
        - For year one it may look like Pre Solar Utility Cost – Post Solar Utility Cost.
        - For the lifetime of the system, the solar cost would be included in the calculations of net savings.
    - Another member mentioned that the Post Solar Utility Cost calculation needed to be adjusted as it is essentially assessed on total production, not on net usage – production.

    - May be better reflected as the [Electricity Usage – Production] * Utility Rate + [Estimated Production * Solar Production Charge].
- One member state that the battery would be at “no cost,” yet this point was clarified to state that the battery costs would need to be included in the net savings calculations.
- The language of this proposal to be worked on to prepare for voting in the coming meetings.

2. Should Estimated Multi-Year Net Savings be required? For Direct Owned (with and/or without financing) and/or TPO?
    - Most members think that multi-year net savings should be required, some pointing out that they cannot imagine selling solar without multi-year savings being present.
    - One member requested that the last bullet (“For financed and third-party owned systems, also include any escalations of payments and other financial terms over the years,” slide 17) be expanded to include that balloon payments must be clearly laid out.
        - There was worry that the balloon or significant payments would not be presented accurately in this scenario without explicitly expanding the bulleted language to include it.

Votes

Proposal 4.1: PV Degradation Rate (%)

a. CT Green Bank - Yes
b. ConnSSA - Absent
c. DEEP - Not Voting
d. Earthlight Tech - No; there is a proposal they support more in this case
e. Eversource - Yes
f. GoodLeap - No; there is a proposal they support more in this case
g. Ion Solar - Yes
h. Ion Solar Pros - Absent
i. OCC - Yes
j. SAVKAT - Yes
k. SEIA - Absent
l. SunRun - No; there is a proposal they support more in this case
m. Tesla - Yes
n. Trinity Solar - No; there is a proposal they support more in this case
o. UI - Yes

Concerns Raised

- No concerns were raised besides there being other proposals that certain groups supported more

Proposal 4.2: PV Degradation Rate (%) – Additional Language

a. CT Green Bank - Yes
b. ConnSSA - Absent
c. DEEP - Not Voting
d. Earthlight Tech - Yes
e. Eversource - Yes
f. GoodLeap - Yes
g. Ion Solar – Yes
h. Ion Solar Pros- Absent
i. OCC - Abstain[1]; they do not believe we have sufficient information
j. SAVKAT - Yes
k. SEIA - Absent
l. SunRun - No; they believe two options are too much for this input
m. Tesla - Yes
n. Trinity Solar – No; they believe two options are too much for this input
o. UI - Yes

Concerns Raised

- Some members believe two options may be too much for this input.
- One member believes we do not have sufficient information to proceed.

Proposal 5: PV Degradation Rate – Multi-Year Savings Estimate

a. CT Green Bank - Yes; their read is that the degradation rate may change annually and instead this solidifies the number
b. ConnSSA - Absent
c. DEEP - Not Voting
d. Earthlight Tech - Yes
e. Eversource - Yes
f. GoodLeap - Yes
g. Ion Solar - Yes
h. Ion Solar Pros - Absent

[1] The Office of Consumer Counsel (OCC) submitted their votes via email due to a scheduling conflict.

i. OCC - No[1]; they believe it would be better for PURA to set the degradation rate based on evidence in the docket as indicated in Proposal 4.1.
j. SAVKAT – Yes
k. SEIA – Absent
l. SunRun – Yes
m. Tesla – Yes
n. Trinity Solar – Yes
o. UI – Yes

Concerns Raised

- One member raised concern that the degradation rate should be set by PURA based on evidence in the docket

Proposal 6: Average Starting Utility Rate

a. There were no votes on this proposal as the CCWG agreed to table the vote until after the proposal was revised and resubmitted.

Concerns Raised

- CCWG members pulling this proposal back to make changes and give concrete examples before voting.
- Tabling his proposal for future meeting

Proposal 7: Utility Escalation Rate (No Greater than 20 Years)

a. CT Green Bank - Yes
b. ConnSSA - Absent
c. DEEP - Not Voting
d. Earthlight Tech - Yes
e. Eversource - Yes
f. GoodLeap - Yes
g. Ion Solar - Yes; they believe 16 years was a random number and think there should not be a “no greater than” clause
h. Ion Solar Pros - Absent
i. OCC - No[1]; It is their understanding that PURA used a 16-year look back. More information is needed in this scenario
j. SAVKAT - Yes
k. SEIA - Yes
l. SunRun - Yes
m. Tesla - Yes

n. Trinity Solar - Yes
o. UI - No; looking backwards is not the same as looking forward and they need more information to make the determination

Concerns Raised

- One member added a caveat to their yes; they believe 16 years is too random and they would rather it equal the 20-year historical growth rate instead of “no greater than”.
- Some members believe that more information is needed to make the determination for the rate.

Proposal 8: Utility Escalation Rate (3%)

a. CT Green Bank - Yes
b. ConnSSA - Absent
c. DEEP - Not Voting
d. Earthlight Tech - Yes
e. Eversource - Yes
f. GoodLeap - Yes
g. Ion Solar - No; only due to the fact that they prefer the prior proposal 7 methodology
h. Ion Solar Pros - Absent
i. OCC - No[1]; They believe the utility escalation rate should be permitted the flexibility of being determined in a PURA proceeding rather than set permanently
j. SAVKAT - Yes
k. SEIA - No; these rates need to reflect the past trends and not just simplicity over one set rate. The number presented needs to be taking into account all historical information
l. SunRun - Yes
m. Tesla - No; they prefer proposal 7 methodology instead
n. Trinity Solar - No; prefer proposal 7 methodology instead
o. UI - No; believes more information is needed

Concerns Raised

- Most members voted No on the basis that they prefer proposal 7 methodologies more, noting that one member says it is beneficial to take into account historical information instead of one set percentage for a specific amount of time.
- Another member voted No stating the flexibility should be determined by PURA in a proceeding.

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OFFICE OF EDUCATION, OUTREACH, & ENFORCEMENT

Docket NO. 25-08-02: Contractor Compliance Working Group

MEETING NOTES

Meeting #8

Thursday, March 12th, 2026

10 am – 12pm ET

Intro

The eighth Contractor Compliance Working Group meeting focuses on voting on proposals regarding the estimated year one net savings and multi-year savings. EOE also presented proposals for discussion on changes to the customer compliance forms. Other discussions centered on if changes to PowerClerk would be required to implement certain proposals, timing of Customer Disclosure Forms, how to include battery storage program calculations, and any discussions on the successor programs to RRES.

Meeting Start Time: 10 am

Participants

Jamie Spannhake (EOE), Brittany Wyman (EOE), Nicole Grant (EOE), Athena Feola (EOE), Katherine von Steinman (EOE/DOE Fellow), Kim White (OCC), Jim Ferrughilli (SAVKAT), Sara Pyne (CGB), Cornelius Stevenson (UI), Jacqueline Monsanto (UI), Sean Riel (Earthlight), Heidi Dragonette (UI), Ed Merrick (Ion Solar), Chelsae Farrell (Trinity Solar), Alexandra Torrealba (UI), Edward Kranich (CGB), David Hernandez (UI), Sergio Carrillo (CGB), Julia Danahy (Eversource), Dominic Gatti (Tesla), Katerina Miller (UI), Michael Farrell (Trinity Solar), Carlos Lozano (GoodLeap), Heather Tebbetts (UI), Amir Yazdi (SEIA), Ted Hart (Tesla), Michael Bokowski (UI), Dominique Moise-Johnson (UI), Marianne Checkoski (SCG), Alex Cruz (SCG), Joshua Kaplan (EOE), Rebecca Adams (EOE)

Administrative Items

- Reminder that silence is deemed consent unless objections are raised.
- Members are responsible for voicing objections and concerns during discussion.
- Voting conducted publicly in alphabetical order (Yes/No/Abstain, with explanation for no or abstain votes)

Discussion on Proposals for Voting

Topic 1 Proposal 9: Estimated Year One Net Savings

Key Discussions

- Created a standardized calculation methodology
    - Pre-Solar Utility Costs – Post-Solar Utility Costs + Solar Cost
- Solar cost treatment differs by ownership structure (cash, financiers, TPO)
- REC values are excluded from the calculation but are an optional additional calculation for contractors.
- Cash purchases will show negative Year One savings, which accurately reflect the terms of their purchase.
- Multi-year savings can still be provided separately to show long-term benefits.
- Questions raised on whether REC value should be included directly in the required calculation.
- Clarification that the Average Starting Utility Rate us still pending PURA determination.

Areas of Concern

- The year one calculation may misrepresent value for cash purchases (large upfront negative cost), but people purchasing a system with cash are aware of this.
- Exclusion of REC value may understate benefits customers are eligible for.
- Customer charge is not reflected in the utility cost comparison.
- There is potential confusion if customers compare different ownership structures.

Areas of Alignment

- General support for a standardized and transparent methodology.
- Agreement that methodology should reflect the actual financial structure differences.
- Recognition that additional calculations may be useful.

Topic 2 Proposal 10: Estimated Multi-Year Net Savings

Key Discussions

- This builds off Year One Net Savings and applies over time:
    - Utility escalation rate
    - PV degradation rate
    - Financing escalations (if applicable)
- Term defined as “up to 20 years” (aligned with RRES program).
    - Should the term be a fixed 20 years or flexible

    - Alignment with PPA/loan terms (often 25+ years)
    - Whether full financing costs (total loan/lease cost) should be used vs. an annualized approach
- Contractors should only include financing escalation if they provide financing.
- External financing (bank/HELOC) is not included.

Areas of Concern

- Lack of standardization on the term length (20 years vs. longer financing terms).
- Misalignment between the RRES 20-year structure and the industry 25-year contracts.
- Complexity in calculating the full financing costs across varying structures.
- Uncertainty on handling edge cases (i.e. short-term loans or balloon payments).

Areas of Alignment

- There is support for a standardized methodology framework.
- Agreement that escalation and degradation should be incorporated.
- General support for a 20-year baseline, with openness to additional calculations.

Topic 3 Customer Disclosure Form Changes

Key Discussions

- Add a checkbox for multi-year savings provided (and require escalation + degradation if yes)
- Add a definitions/terms section for transparency in calculations.
- Break out net savings into:
    - Utility savings
    - Solar costs
- Add a checkbox for financing and require disclosure of escalation/balloon terms.
- Add a fillable text box for alternative methodologies (i.e. less than 12 months of usage).
- Remove shading line items (viewed as low value to customers).
- Rename fields to align with:
    - “Estimated Year One Customer Net Savings”
    - “Starting utility rate used to estimate Year one Customer Net Savings”
    - “Utility escalator rate used to estimate multi-year savings”
- Group discussion focused on:
    - Multi-year savings should remain optional, not required.
    - Strong support for improving clarity and customer understanding
    - Concern about increasing form length vs. improving transparency.

Areas of Concern

- Should multi-year net savings remain optional or should they be required on the CDFs.
- Potential for increased complexity and length of the form with the added definitions, fields, and explanations.
- Risks that additional detail may overwhelm or confuse customers rather than improving understanding.
- Uncertainty around situations with incomplete data.
- Concerns about requiring additional disclosures increasing administrative burden.

Areas of Alignment

- There is strong support for improving clarity and transparency on the CDFs.
- Agreement that terminology should align with year one and multi-year framing.
- General agreement that shading line items provide limited value.
- Support for adding explanations of the calculation methodologies.

Open Issues/Discussions

- Whether multi-year net savings should be required vs. optional.
- Standardization of the term lengths for multi-year savings (20 vs 25+).
- If REC values should be included in standard calculation and if so how.
- Guidance or when revised CDFs are required.
- Potential thresholds for requiring updated forms.
- Lack of standardization for annual solar production modeling due to software variability.
- Whether PowerClerk updates are needed to support additional CDF fields.
- How to incorporate battery storage calculations into savings methodologies.
- Considerations for aligning with the successor program to RRES.

Action Items and Next Steps

- Any member can make a proposal for voting during the meeting or before the meeting via email to Jamie and Brittany.
- Please send any proposals or questions to Brittany this week, as Jamie is out of office.

Proposals for Voting this Meeting

1. Proposal 9: Estimated Year One Net Savings
    a. The methodology for calculating Estimated Year One Net Savings in the Customer Disclosure Form and Contractor Compliance filings will be:
        i. Estimated Year One Net Savings = [Pre-Solar Utility Costs] - [Post-Solar Utility Costs] + [Solar Cost]
    b. Terms defined and calculated as follows:
        i. Pre-Solar Utility Costs = Customer's Annual Electricity Usage * Average Starting Utility Rate • Post-Solar Utility Costs = ((Customer's Annual Electricity Usage – Estimated Year One Production) * Average Starting Utility Rate) + (Solar Production Charge * Estimated Year One Production)
        ii. Solar Cost =
            1. For Direct Owned without financing: cost of the system
            2. For Direct Owned with financing: total of payments in Year One
            3. For Third-Party Owned: total of payments in Year One
        iii. Contractor must inform customer that this calculation methodology does not include the value of RECs, if any
        iv. Contractor may provide an additional calculation based on the above methodology that adds the estimated value of RECs if the customer will receive the value of RECs
2. Proposal 10: Estimated Multi-Year Net Savings
    a. The methodology for calculating Estimated Multi-Year Net Savings in the Customer Disclosure Form and Contractor Compliance filings will:
        i. Start with the Estimated Year One Net Savings and over the term of years (up to 20 years)
            1. (a) increase the utility rate by the defined utility escalation rate;
            2. (b) decrease the annual production by the defined PV degradation rate; and
            3. (c) if the system is financed (loan, lease, or PPA), adjust the financing payments by

Proposal for Voting at Next Meeting

3. Proposal 11: Estimated Year One Net Savings (from Earthlight Technologies)
    a. Same Proposal as 9 except for the last bullet point
    b. The methodology for calculating Estimated Year One Net Savings in the Customer Disclosure Form and Contractor Compliance filings will be:
        i. Estimated Year One Net Savings = [Pre-Solar Utility Costs] - [Post-Solar Utility Costs] + [Solar Cost]

ii. Terms defined and calculated as follows:
    1. Pre-Solar Utility Costs = Customer's Annual Electricity Usage * Average Starting Utility Rate
    2. Post-Solar Utility Costs = ((Customer's Annual Electricity Usage – Estimated Year One Production) * Average Starting Utility Rate) + (Solar Production Charge * Estimated Year One Production)
iii. Solar Cost =
    1. For Direct Owned without financing: cost of the system
    2. For Direct Owned with financing: total of payments in Year One
    3. For Third-Party Owned: total of payments in Year One
iv. Contractors may include the value of RECs in this calculation methodology, if any

Proposals for Discussion from EOE

1. Changes to Customer Disclosure Forms
    a. <u>Both DO and TPO CDFs</u>
        i. Add Yes/No checkbox for "Are multi-year net savings estimates provided?" If yes is checked, then must include on CDF:
            1. PV Degradation Rate and
            2. Utility Escalation Rate.
        ii. Add Definitions/Terms section, or footnotes with explanations for calculation methodologies (see next slide).
        iii. Add break out of Net Savings to two line items: Utility Savings and Solar Costs.
            1. For Multi-Year?
            2. For Year One?
        iv. Add Yes/No checkbox for "Is the system being financed?" If yes, then must include on the CDF the financial escalation terms, including any balloon payments.
        v. Add fillable text box to explain calculations when the standard cannot be used (e.g. when a customer does not have 12 months of actual usage to determine past kWh usage) and allowed alternate calculation methodologies (e.g. calculations made by software).
        vi. Remove shading line items.
    b. <u>Direct Owner CDFs</u>
        i. Change "Estimated net average monthly savings ($)" to "Estimated Year One Customer Net Savings".

ii. “Starting Utility rates used to estimate net average monthly savings” to “Starting utility rate used to estimate Year One Customer Net Savings”.
iii. “Escalator rate used to estimate net average monthly savings” to “Utility escalator rate used to estimate net multi-year savings”.

c. Third Party Owned CDFs
   i. Change “Escalator rate used to estimate net year one savings” to “Utility escalator rate used to estimate net multi-year savings”.

Votes

1. Proposal 9- Estimated Year One Net Savings
    a. CT Green Bank- Yes
    b. ConnSSA- Absent
    c. DEEP- Absent
    d. Earthlight Tech- No, regards to the second to last bullet point; believe that the customer disclosure form
    e. Eversource- Yes, it is important to note that the customer charge is not included in the calculation.
    f. GoodLeap- Yes
    g. Ion Solar- Yes
    h. Ion Solar Pros- Absent
    i. OCC- Absent
    j. SAVKAT- Yes
    k. SEIA- Abstain, subtracting the total cost of the system if you aren't using a loan for year 1 can make other options look more appealing to the customers.
    l. SunRun- Absent
    m. Tesla- Yes, mirroring note by SEIA
    n. UI- Yes, same as Eversource
2. Proposal 10- Estimated Multi-Year Net Savings
    a. CT Green Bank- Yes, 20 years to align with RRES terms, no opposed to a follow up for beyond the 20.
    b. ConnSSA- Absent
    c. DEEP- Not voting
    d. Earthlight Tech- Yes
    e. Eversource- No, yes on methodology but some standardization would be preferred.
    f. GoodLeap- Yes
    g. Ion Solar- No, set at 20 years
    h. Ion Solar Pros- Absent
    i. OCC- Absent
    j. SAVKAT- Yes, stronger for up to 25 years but this is fine as well
    k. SEIA- Yes, alternate proposal for just 20 years as the standard and then can provide other years, calculation of the cost of financial products, subtract the total cost of the loan of lease
    l. SunRun- Absent
    m. Tesla- Yes
    n. Trinity Solar- Yes, wouldn't be opposed to alternate proposal to discuss the term beyond 20.

o. UI- No, 20 years same as Eversource.

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OFFICE OF EDUCATION, OUTREACH, & ENFORCEMENT

Docket No. 25-08-02: Contractor Compliance Working Group

MEETING NOTES

Meeting #9

Thursday, March 19th, 2026

10 am – 12pm ET

Intro

The ninth Contractor Compliance Working Group was the last meeting for proposals and voting on proposals. This meeting focused on gathering any input and concerns that members may have about any of the proposals and wrapping up the working group. There was also discussion on what the final steps of the working group will be and what members can expect at the next meeting.

Meeting Start Time: 10 am

Participants

Brittany Wyman (EOE), Athena Feola (EOE), Katherine von Steinman (EOE/DOE Fellow), Julia Danahy (Eversource), Michael Bokowski (UI), Jim Ferrughelli (SAVKAT), Sara Hildebrand (Tesla), Alexandra Torrealba (UI), Dominique Moise-Johnson (UI), Sean Riel (Earthlight Tech), Sara Pyne (CBG), Dominic Gatti (Tesla), Ted Hart (Tesla), Chelsea Farrell (Trinity Solar), Katerina Miller (UI), Jacqueline Monsanto (UI), Cornelius Stevenson (UI), Amir Yazdi (SEIA), Kyle Wallace (SunRun), Carlos Lozano (GoodLeap), Ed Merrick (Ion Solar)

Administrative Items

- Jamie is out of office until next week, Brittany will be running this week's meeting.
- Reminder that silence is deemed consent unless objections are raised.
- Members are responsible for voicing objections and concerns during discussion.
- Voting conducted publicly in alphabetical order (Yes/No/Abstain, with explanation for no or abstain votes)

Discussion on Proposals for Voting

Topic 1 Proposal 11: Estimated Year One Net Savings (from Earthlight Technologies)

Key Discussions

- Inclusion of performance-based incentives in Year One Savings.
- Clarified that incentives may include adders and other programs.
- There was discussion on direct vs. indirect receipt of incentives.

Areas of Concern

- Ambiguity in “directly” receiving incentives.
- Scope of non-solar incentives.
- Potential inconsistency should be included if clearly defined.

Areas of Alignment

- General support for including customer financial benefits.
- Agreement that incentives should be included if clearly defined.

Topic 2 Proposal 12: Estimated Year One Net Savings (from Earthlight Technologies)

Key Discussions

- Adding PV degradation to performance-based incentives overtime.
- Clarification that incentives tied to production should decline annually.

Areas of Concern

- Continued ambiguity in “performance-based” and “directly”.
- Confusion on applying PV degradation to incentives.
- Disagreement on “up to 20 years” v. a fixed term.

Areas of Alignment

- Agreement that degradation should apply to production-based incentives.
- General Support for including incentives in multi-year calculations.

Topic 3 Proposal 13: Estimated Multi-Year Net Savings (from Earthlight Technologies)

Key Discussions

- Establishing a fixed 20-year term for savings.
- Alignment with the RRES program duration.
- Discussion on uncertainty beyond 20 years.

Areas of Concern

- A lack of flexibility for financing terms beyond 20 years.
- Ongoing concerns with incentive language (bullet point d).
- Potential mismatch between financing and savings timeframes.

Areas of Alignment

- Strong support for 20-year standardization.
- Agreement reflects the program structure and reduces speculations.

Topic 4 Proposal 14: Estimated Multi-Year Net Savings (from EOE)

Key Discussions

- Removal of the incentive component (bullet point d).
- Clarification of 20-year savings vs. financing duration.

Areas of Concern

- How to reflect payments beyond 20 years.
- Customers understanding of remaining financial obligations.
- Preference for including incentives from proposal 13.

Areas of Alignment

- Agreement that savings reflect program terms, and not the system lifetime.
- Financing details are handled outside of the savings calculations.

Topic 5 Proposal 15: Estimated Multi-Year Net Savings (from EOE)

Key Discussions

- Whether multi-year savings should be required.
- Contractors noted many only provide year one savings.
- Challenges with battery/storage integration.

Areas of Concern

- Required multi-year savings may be misleading.
- There could be difficulty incorporating battery storage economics.
- It is not standard practice across contractors.
- Challenges separating solar vs. storage incentives.

Areas of Alignment

- Multi-year savings can be useful.
- Preference toward this being optional rather than required.

Topic 6 Proposal 16: Changes/Additions to Customer Disclosure Forms (from EOE)

Key Discussions

- Add a checkbox for multi-year savings provided.
- Require the inclusion of PV degradation + escalation rates if yes.

Areas of Concern

- Dependent on whether multi-year savings are required vs. optional.

Areas of Alignment

- Strong support for the checkbox approach.
- Improves flexibility and transparency.

Topic 7 Proposal 17: Changes/Additions to Customer Disclosure Forms (from EOE)

Key Discussions

- Add definitions/terms sheet.
- Add a fillable text box for non-standard calculations.
- Clarified intent is for limited scenarios.

Areas of Concern

- Text box (bullet 7) is too broad.
- Risk of customer confusion if there is too much technical detail.
- Potential exposure of proprietary methods.
- Adds length to already complex forms.

Areas of Alignment

- Definitions improve clarity and transparency.
- Support for explanations in limited, non-standard cases only.
- Alternative placement (website/email) may be better so customers are not overwhelmed with a large disclosure form.

Topic 8 Proposal 18: Changes/Additions to Customer Disclosure Forms (from EOE)

Key Discussions

- Add item lines for utility savings and solar costs.
- The goal is to improve transparency of calculations.

Areas of Concern

- Duplication of existing forms.

- Increased form complexity and confusion.
- Difficulty reflecting solar costs across financing types.

Areas of Alignment

- Transparent in calculating breakdowns is valuable.
- This helps the customers understand the components of savings.

Topic 9 Proposal 19: Changes/Additions to Customer Disclosure Forms (from EOE)

Key Discussions

- Add a checkbox for whether the system is financed or not.
- Require disclosure of the financing terms if applicable.

Areas of Concern

- Duplication with loan disclosures.
- Contractors may lack full financing details.
- Mixing separate agreements (loan vs. solar contract).
- Consumer finance regulatory concerns.

Areas of Alignment

- Financing impacts customer savings and should be transparent.
- Disagreement on where/how to disclose this.

Topic 10 Proposal 20: Changes/Additions to Customer Disclosure Forms (from EOE)

Key Discussions

- Proposal discussion shifted from formal voting to open feedback and preference gathering.
- Members were asked to provide input, suggested changes, and their preferences rather than a straight yes or no.
- Discussion focused on the overall structure, clarity, and usability of the disclosure forms.

Areas of Concern

- Lack of clear voting structure or outcome created some confusion.
- Difficulty evaluating the proposal in isolation without the full form context.
- Forms are becoming too long and complex.
- Risk of overwhelming customers.
- Adding fields without removing others.

- Uncertainty about how feedback would be incorporated into the final recommendations as there was no live editing of the proposal or any future voting.

Areas of Alignment

- Need for clear, consumer-friendly disclosures.
- Simplicity and usability are important.
- General agreement is that additional review and refinement is needed.
- Support for incorporating stakeholder feedback into the final report to PURA.

Topic 11 & 12 Proposals 21 & 22: Changes/Additions to Customer Disclosure Forms (from EOE)

Key Discussions

- Limited discussion on each proposal individually.
- Treated as a part of broader disclosure form updates.
- Focus on overall clarity, usability, and structure of the forms.
- Recognition that proposals should be viewed collectively rather than in isolation.

Areas of Concern

- Concern about increasing the form length and complexity.
- Risk of overloading customers with too much information.
- Need to balance transparency with simplicity and usability.

Areas of Alignment

- General agreement on clarity and transparency for customers.
- Support for making disclosure forms more user-friendly and understandable.
- Agreement that the final decision should reflect an overall form design, not individual changes alone.

Action Items and Next Steps

- The last meeting is Thursday, March 26, 2026, 10am-12pm
- Review of proposals voted on during the CCWG meetings.
- There will be no new proposals at the next meeting.
- This is the last opportunity to share any comments to be included in the report to the Authority, which EOE will file with the Authority on March 31, 2026.

Proposals for Voting this Meeting

Proposal 11: Estimated Year One Net Savings

a. The methodology for calculating Estimated Year One Net Savings in the Customer Disclosure Form and Contractor Compliance filings will be:
    i. Estimated Year One Net Savings = [Pre-Solar Utility Costs] - [Post-Solar Utility Costs] + [Solar Cost]
    ii. Terms defined and calculated as follows:
        1. Pre-Solar Utility Costs = [Customer's Annual Electricity Usage] * [Average Starting Utility Rate]
        2. Post-Solar Utility Costs = ((Customer's Annual Electricity Usage – Estimated Year One Production) * Average Starting Utility Rate) + (Solar Production Charge * Estimated Year One Production)
b. Solar Cost =
    i. For Direct Owned without financing: cost of the system
    ii. For Direct Owned with financing: total of payments in Year One
    iii. For Third-Party Owned: total of payments in Year One
c. Contractors may include the value of any applicable performance-based incentives in this calculation methodology if the customer is directly receiving the incentives.

Proposal 12: Estimated Multi-Year Net Savings

d. The methodology for calculating Estimated Multi-Year Net Savings in the Customer Disclosure Form and Contractor Compliance filings will:
    i. Start with the Estimated Year One Net Savings and over the term of years (up to 20 years)
        1. Increase the utility rate by the defined utility escalation rate;
        2. Decrease the annual production by the defined PV degradation rate;
        3. If the system is financed (loan, lease, or PPA), adjust the financing payments by the applicable financial escalations, including any balloon payments; and
        4. If the customer is eligible to directly receive the value of any applicable performance-based incentives, decrease the annual performance-based incentive by the defined PV degradation rate.

Proposal 13: Estimated Multi-Year Net Savings

a. The methodology for calculating Estimated Multi-Year Net Savings in the Customer Disclosure Form and Contractor Compliance filings will:
    i. Start with the Estimated Year One Net Savings and over the term of years (20 years)
        1. Increase the utility rate by the defined utility escalation rate;
        2. Decrease the annual production by the defined PV degradation rate;
        3. If the system is financed (loan, lease, or PPA), adjust the financing payments by the applicable financial escalations, including any balloon payments; and
        4. If the customer is eligible to directly receive the value of any applicable performance-based incentives, decrease the annual performance-based incentive by the defined PV degradation rate.

Proposal 14: Estimated Multi-Year Net Savings

a. The methodology for calculating Estimated Multi-Year Net Savings in the Customer Disclosure Form and Contractor Compliance filings will:
    i. Start with the Estimated Year One Net Savings and over the term of years (20 years)
        1. Increase the utility rate by the defined utility escalation rate;
        2. decrease the annual production by the defined PV degradation rate; and
        3. if the system is financed (loan, lease, or PPA), adjust the financing payments by the applicable financial escalations, including any balloon payments.

Proposal 15: Estimated Multi-Year Net Savings

a. Contractors Must provide Multi-Year Net Savings* to every customer in their Customer Disclosure Forms** and to PURA in their Compliance Filings.
    i. * The methodology for calculating Multi-Year Net Savings will be determined by PURA
    ii. **Provided that PURA includes in the Customer Disclosure Forms a line-item for Multi-Year Net Savings (Which are not currently included).

Proposal 16: Changes/Additions to Customer Disclosure Forms

a. Contractors must provide Multi-Year Net Savings* to every customer in their Customer Disclosure Forms** and to PURA in their Compliance Filings.
b. Add Yes/No checkbox for “Are multi-year net savings estimates provided?” to the Direct Owned and Third-Party Owned Customer Disclosure Forms.
    i. If yes is checked, then must include on Customer Disclosure Forms:
    ii. PV Degradation Rate and
    iii. Utility Escalation Rate.*
        1. *As these terms are defined by PURA as a result of the CCWG Report.

Proposal 17: Changes/Additions to Customer Disclosure Forms

a. Add Definitions/Terms section to the Direct Owned and Third-Party Owned Customer Disclosure Forms that will include the following:
    i. Average Starting Utility Rate ($0.0/kWh)
    ii. Utility Escalation Rate (%)
    iii. PV Degradation Rate (%)
    iv. Estimated Year One Net Savings ($)
    v. Estimated Multi-Year Net Savings ($)
    vi. Estimated Year One Production (kWh)
    vii. Fillable text box to detail Software Calculations and/or Alternate or Non-standard Calculation Methodologies, if allowed by PURA*
        1. All terms and definitions will be based on PURA’s decision on those terms and definitions.
        2. * If PURA determines that alternate or non-standard calculations are not allowed with would not be included in the Definitions/Terms section of the CDFs.

Proposal 18: Changes/Additions to Customer Disclosure Forms

a. Add two line-items for Utility Savings and Solar Costs* to the Direct Owned and Third-Party Owned Customer Disclosure Forms.
    i. The purpose of this proposal is to provide transparency to customers regarding how the net savings (first-year and multi-year) are calculated. It is particularly important for customers who buy their systems outright.
        1. *As these terms are defined by PURA as a result of the CCWG.

Proposal 19: Changes/Additions to Customer Disclosure Forms

a. Add Yes/No checkbox to the Direct Owned and Third-Party Owned Customer Disclosure Forms (CDFs) for “Is the system being financed through a financing option provided by the contractor/developer?”
    i. If yes, then must include on the CDFs the financial escalation terms, including any balloon payments.

Proposal 20: Changes/Additions to Customer Disclosure Forms

a. Remove shading information from the Direct Owned and Third-Party Owned Customer Disclosure Forms.

Proposal 21: Changes/Additions to Customer Disclosure Forms

a. On the Direct Owner Customer Disclosure Form make the following changes:

From (currently on the CDF)	To (proposed change to CDF)
Estimated net average monthly savings ($)	Estimated Year One Customer Net Savings
Starting Utility rates used to estimate net average monthly savings	Starting utility rate used to estimate Year One Customer Net Savings
Escalator rate used to estimate net average monthly savings	Utility escalator rate used to estimate net multi-year savings

Proposal 22: Changes/Additions to Customer Disclosure Forms

a. On the Third Party Owned Customer Disclosure Form make the following change:

From (currently on the CDF)	To (proposed change to CDF)
Escalator rate used to estimate net year one savings	Utility escalator rate used to estimate net multi-year savings

Votes

Proposal 11- Estimated Year One Net Savings

a. CT Green Bank- Yes, if language is tweaked okay with that too
b. ConnSSA- Absent
c. DEEP- Non-voting
d. Earthlight Tech- Yes
e. Eversource- No, Performance based meant rec, but if others are included then it's a no
f. GoodLeap- Yes
g. Ion Solar- Yes, Incentive language is stated, direct or indirect incentives are important
h. Ion Solar Pros- Absent
i. OCC- Absent
j. SAVKAT- Yes
k. SEIA- Yes
l. SunRun- Yes, concern about ESS piece, RRES adders should be included for the customer
m. Tesla- No, previous points, go to rec to PURA with notes on refining this language
n. Trinity Solar- Yes, Similar concerns to tweak language
o. UI- No, agree with the statement from Eversource

Proposal 12- Estimated Multi-Year Net Savings

a. CT Green Bank- Yes, understand the directly, doesn't understand UP TO 20 years, do think proposal 13 is clearer
b. ConnSSA- Absent
c. DEEP- Non-voting
d. Earthlight Tech- Yes
e. Eversource- No, primarily because of the variable term
f. GoodLeap- Yes
g. Ion Solar- Yes, concerns about the 20-year term and how directly is defined and the performance-based incentives
h. Ion Solar Pros-Absent
i. OCC- Absent
j. SAVKAT- Yes
k. SEIA- Yes
l. SunRun- Yes
m. Tesla- No, the term directly and performance based. They do support flexibility of up to 20 years

n. Trinity Solar- Yes
o. UI- No, up to 20 years, and item D needs to be more defined

Proposal 13- Estimated Multi-Year Net Savings

a. CT Green Bank- Yes, RRES is 20 years, so this aligns
b. ConnSSA- Absent
c. DEEP- Non-voting
d. Earthlight Tech- Yes
e. Eversource- No, appreciate the 20-year term and would be okay with d if it were solar specific incentives.
f. GoodLeap- Yes
g. Ion Solar- Yes Choice voting, preferences over some over others, language in d needs to be improved. Like the 20-year term
h. Ion Solar Pros- Absent
i. OCC- Absent
j. SAVKAT- Yes
k. SEIA- Yes, note on c about loans
l. SunRun- Yes
m. Tesla- No, prefer a flexible contract term and d
n. Trinity Solar- Yes
o. UI- No, same as Eversource

Proposal 14- Estimated Multi-Year Net Savings

a. CT Green Bank- Yes, understand that there should be something related to the incentives
b. ConnSSA- Absent
c. DEEP- Non-voting
d. Earthlight Tech- Yes
e. Eversource- Yes
f. GoodLeap- Yes
g. Ion Solar- No, because voted yes on previous and prefers language about incentives
h. Ion Solar Pros- Absent
i. OCC- Absent
j. SAVKAT- No, prefers proposal 13
k. SEIA- Yes
l. SunRun- Yes, prefers previous one
m. Tesla- No, 20-year term and point back to d in previous ones
n. Trinity Solar-Yes, preference to 13
o. UI-Yes

Proposal 15- Estimated Multi-Year Net Savings

a. CT Green Bank- Yes
b. ConnSSA- Absent
c. DEEP- Non-voting
d. Earthlight Tech- No, prefer the optionality, merits to showing savings on direct ownership but third party is a different conversation
e. Eversource- Yes
f. GoodLeap- No, because of the wording, would prefer to see it say solar only savings, not to include the battery component.
g. Ion Solar- No, battery component, not opposed to solar only, but it has to be a solar only project, but can see how this will cause confusion
h. Ion Solar Pros-Absent
i. OCC- Absent
j. SAVKAT- Yes, prefer solar only language
k. SEIA- Abstain, refer to the solar companies opinions
l. SunRun- No, don't think it should be required, would support solar only
m. Tesla- No, would prefer multiyear optional, and now adding more length and not taking any lines off
n. Trinity Solar- No, don't agree with the language of must provide multi-year savings.
o. UI- Yes

Proposal 16- Changes/Additions to Customer Disclosure Forms

a. CT Green Bank- Yes
b. ConnSSA- Absent
c. DEEP- Non-voting
d. Earthlight Tech- Yes
e. Eversource- Yes
f. GoodLeap- Yes
g. Ion Solar- Yes
h. Ion Solar Pros- Absent
i. OCC- Absent
j. SAVKAT- Yes
k. SEIA- Yes
l. SunRun- Yes
m. Tesla- Yes, assuming the check box means there is optionality
n. Trinity Solar- Yes
o. UI- Yes

Proposal 17- Changes/Additions to customer Disclosure Forms

a. CT Green Bank- Yes
b. ConnSSA- Absent
c. DEEP- Non-voting
d. Earthlight Tech- Yes
e. Eversource- No, not opposed to providing this info but the form is already very long and adding it there may not be the most effective way to get the info to customers. This info could be put on the website or in an email.
f. GoodLeap- Yes
g. Ion Solar- Yes, prefer a two pager with this being on the back, and Julias point
h. Ion Solar Pros- Absent
i. OCC- Absent
j. SAVKAT- Yes, without number 7
k. SEIA- Yes, with the caveat of 7 and making it clear that it is with the non-standard estimates of usage
l. SunRun- Yes, support of Eversource's recommendations
m. Tesla- Yes, Number 7 If it was narrowed to when there are not 12 months of usage, preferably to fully eliminate this as well. Also, Eversource's comments
n. Trinity Solar- Yes
o. UI- No, similar to Eversource

Proposal 18- Changes/Additions to Customer Disclosure Forms

a. CT Green Bank- Yes
b. ConnSSA- Absent
c. DEEP- Non-voting
d. Earthlight Tech- No, looking at redundancy and information, causing analysis paralysis
e. Eversource- Yes
f. GoodLeap- Yes
g. Ion Solar- No, reasons previously stated
h. Ion Solar Pros- Absent
i. OCC- Absent
j. SAVKAT- Yes
k. SEIA- Yes
l. SunRun- No, the duplicative piece, doesn't want to see year one payments and additionally the solar cost. Adding a lot of things that may be confusing. Just adding Utility savings could be a yes.

m. Tesla- No, Same as SunRun, soft no understanding that these are things elsewhere in the form. Could see the advantage when comparing but won't be effective for the average consumer going solar. In total this is not helpful
n. Trinity Solar- No and echoes what Tesla said.
o. UI- Yes

Proposal 19- Changes/Additions to Customer Disclosure Forms

a. CT Green Bank- Yes
b. ConnSSA- Absent
c. DEEP- Non-voting
d. Earthlight Tech- Yes
e. Eversource- Yes
f. GoodLeap- Yes
g. Ion Solar- No, already provided in the agreements to the homeowner by the Law or the PPA
h. Ion Solar Pros- Absent
i. OCC- Absent
j. SAVKAT- Yes
k. SEIA- No as drafted, these agreements come from the lender not the contractor, they are not an expert for this information. Could end up confusing the customer.
l. SunRun- Yes, but this isn't relevant to the TPO disclosure form
m. Tesla- No, needs specifically the loose explanations about introductions and having TPO in here, if it was stricter they would be in support.
n. Trinity Solar- No, in line with Ion Solar's comments.
o. UI- Yes

Proposal 20- Changes/Additions to Customer Disclosure Forms (note that some participants provided preferences as directed rather than straight yes or no votes)

a. CT Green Bank- In favor of removing has the shading analysis been completed, suggest how much production is expected to be lost should stay. This is helpful for developers and on the admin side if customers are confused.
b. ConnSSA- Absent
c. DEEP- Non-voting
d. Earthlight Tech- Okay with getting rid of both, a full yes.
e. Eversource- Only comfortable removing both if it was replaced by a checkbox that says shading was considered in the production estimates.

Okay with putting it in the language of the requirements but less preference for that.

f. GoodLeap- Remove the checkbox because it is a given, prefer to add a specific shade or solar access percentage.
g. Ion Solar- Yes, could include shading into estimated year on production in the definitions. Also noted the amount of data that this would collect and how do they get that information over in an easy way.
h. Ion Solar Pros- Absent
i. OCC- Absent
j. SAVKAT- Yes, adding it to a definition saying shading was considered.
k. SEIA- A definition because the field is too nuanced to be put into a checkbox.
l. SunRun- Yes
m. Tesla- Generally yes on consolidating the fields. Supports a checkbox as most people aren't going to stop and ask about each line on the form, a checkbox would bring attention to it to have a conversation about it.
n. Trinity Solar- Yes, definition is fine over a checkbox
o. UI- Yes for the checkbox and included in the definitions as well

Proposal 21- Changes/Additions to Customer Disclosure Forms

a. CT Green Bank- Yes
b. ConnSSA- Absent
c. DEEP- Non-voting
d. Earthlight Tech- Yes
e. Eversource- Yes
f. GoodLeap- Yes
g. Ion Solar- Yes
h. Ion Solar Pros- Absent
i. OCC- Absent
j. SAVKAT- Yes
k. SEIA- Yes
l. SunRun- Yes
m. Tesla- Yes
n. Trinity Solar- Yes
o. UI- Yes

Proposal 22- Changes/Additions to Customer Disclosure Forms

a. CT Green Bank- Yes
b. ConnSSA- Absent
c. DEEP- Non-voting

d. Earthlight Tech- Yes
e. Eversource- Yes
f. GoodLeap- Yes
g. Ion Solar- Yes
h. Ion Solar Pros- Absent
i. OCC- Absent
j. SAVKAT- Yes
k. SEIA- Yes
l. SunRun- Yes
m. Tesla- Yes
n. Trinity Solar- Yes
o. UI- Yes

STATE OF CONNECTICUT

PUBLIC UTILITIES REGULATORY AUTHORITY

OFFICE OF EDUCATION, OUTREACH, & ENFORCEMENT

Docket No. 25-08-02: Contractor Compliance Working Group

MEETING NOTES

Meeting #10

Thursday, March 26th, 2026

10 am – 12pm ET

Intro

The tenth Contractor Compliance Working Group meeting focused on wrapping up the working group. The participants were given the opportunity to review the proposals one final time and provide any questions, comments, or concerns to the Office of Education, Outreach, and Enforcement before the final report is submitted to PURA.

Meeting Start Time: 10 am

Participants

Jamie Spannhake (EOE), Brittany Wyman (EOE), Athena Feola (EOE), Sean Riel (Earthlight Tech), Dominique Moise-Johnson (UI), Micheal Farrell (Trinity Solar), Sara Pyne (CGB), Jacqueline Monsanto (UI), Sara Hildebrand (Tesla), Dominic Gatti (Tesla), Chelsea Farrell (Trinity Solar), Carlos Lozano (Goodleap), Heidi Dragonette (UI), Alexandra Torrealba (UI), Kyle Wallace (SunRun), David Hernandez (UI), Ed Merrick (Ion Solar), Katerina Miller (UI)

Administrative Items

- Reminder that silence is deemed consent unless objections are raised.
- Members are responsible for voicing objections and concerns during discussion.
- There is a total of 14 voting members (not including DEEP who participated as a non-voting member).
- Absence was deemed consent during this working group.

Discussion on Proposals for Voting

Open Call for Final Question or Comments

Key Discussions

- Whether battery storage should be included in incentive modeling or savings modeling in the RRES program is something to be considered for the successor programs.
- The final report language and how EOE will submit the final report to PURA.
- Earthlight noted their commentary on Proposal 1 should include that winter months have a higher supply rate than summer months and that the all-in rate for 2025 is weighted more heavily for the winter months.

Action Items and Next Steps

- EOE will submit the final report from the CCWG directly to PURA within Docket No. 25-08-02.
- As a reminder PURA will be making the final decision. This report is a set of recommendations for PURA to consider.
- EOE stated that it will request that PURA allow members to file comments on the final report after it has been submitted.