STATE OF CONNECTICUT

PUBLIC UTILITIES REGULATORY AUTHORITY
OFFICE OF EDUCATION, OUTREACH, & ENFORCEMENT

DOCKET NO. 25-08-02

ANNUAL RESIDENTIAL RENEWABLE ENERGY SOLUTIONS PROGRAM REVIEW – YEAR 5

-and-

DOCKET NO. 26-08-02

ANNUAL RESIDENTIAL RENEWABLE ENERGY SOLUTIONS PROGRAM REVIEW – YEAR 6

CONTRACTOR COMPLIANCE WORKING GROUP REPORT

MARCH 31, 2026

10 Franklin Square, New Britain, CT 06051
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I. INTRODUCTION

The Contractor Compliance Working Group (CCWG) was established by the Public Utilities Regulatory Authority (Authority or PURA) in its Final Decision in Docket No. 25-08-02, dated December 17, 2025. The Authority directed the Office of Education, Outreach, and Enforcement (EOE) to facilitate and lead the CCWG and file a report in Docket No. 26-08-02 no later than March 31, 2026.

Specifically, Order No. 25 provided as follows:

> *No later than March 31, 2026, EOE shall file, on behalf of the Contractor Compliance Working Group (CCWG), a final report for review and approval in Docket No. 26-08-02 with the CCWG's recommendations regarding specific inputs, assumptions, and calculation methodologies that should be standardized across RRES project applications. At a minimum, the CCWG recommendations shall include proposals for standardizing the starting utility rate used to estimate net year one savings, annual utility rate escalation, and degradation rate. Additionally, the CCWG shall provide recommendations regarding the process and frequency of updating such inputs; the incorporation of standardized calculations and assumptions into the RRES application, Customer Disclosure Form, and annual contractor filing requirements; the process for auditing contractor compliance with standardized calculation requirements; and the date that any proposed standardized calculation requirements should take effect for installers in the RRES Program. The report should specify consensus and non-consensus proposals and include relevant participant comments. Additionally, the CCWG report shall include a recommendation for verification of the requirement for RRES contractors to provide a disclosure form before contract signing, either at the time of application or through EOE's contractor auditing process.*

Final Decision, Dec. 17, 2025, Docket No. 25-08-02, Annual Residential Renewable Energy Solutions Program Review – Year 5, p. 36. The Authority further stated that "any proposed changes to the PowerClerk application should be included in the [CCWG]'s report of recommendations" and that the CCWG should "file updated clean and redlined program documents." Id., p. 19 and n. 4 (referring to ConnSSA's Motion No. 54 in Docket No. 23-08-02RE01, requesting six fields be added to PowerClerk).

EOE invited all participants on the service lists of Docket No. 25-08-02 and Docket No. 25-08-02RE01 as well as individually invited representatives of United Illuminating (UI), Eversource, Office of Consumer Counsel (OCC), DEEP Bureau of Energy and Technology Policy (BETP), Solar Energy Industries Association (SEIA), Connecticut Solar and Storage Association (ConnSSA), and Connecticut Green Bank (CGB) to participate in the CCWG. In addition, any party that reached out to EOE to join the CCWG, whether they were directly invited or not, was allowed to join the working group.

II. WORKING GROUP PROCESS

A. MEMBERS AND MEETING SCHEDULE

There were fifteen members[1] of the CCWG, with fourteen voting and one member (DEEP BETP) opting to participate as a non-voting member. Because DEEP BETP opted to be a non-voting member, they are not included in any voting tallies throughout this report, i.e. they were not marked as abstaining. Following are the members and their voting representatives.

Org/Company	Name
CGB	Sara Pyne
CGB	Sergio Carrillo
ConnSSA	Mike Trahan
DEEP BETP	Eric Annes (non-voting)
Earthlight Technologies	Sean Riel
Eversource	Julia Danahy
Eversource	Brian Rice (optional)
GoodLeap	Jake Assael
GoodLeap	Betsy Scherzer (optional)
GoodLeap	Carlos Lozano (optional)
Ion Solar	Ed Merrick
Ion Solar Pros (ISP)	Bill Barrieau
Ion Solar Pros (ISP)	Todd Carew
OCC	Kimberly “Kim” White
SAVKAT	James “Jim” Ferrughelli
SEIA	Amir Yazdi
SunRun	Kyle Wallace
Tesla	Dominic Gatti
Tesla	Sara Hildebrand
Tesla	Ted Hart
Trinty Solar	Michael “Mike” Farrell
Trinity Solar	Chelsea Farrell
UI	Cornelius Stevenson
UI	Michael Bokowski
UI	David Hernandez
UI	Katerina Miller
UI	Dominique Moise-Johnson
UI	Alexandra Torrealba
UI	Heidi Dragonette
UI	Jacqueline Monsanto

[1] In addition to the fifteen members who participated in the CCWG, Bright Planet Solar initially joined but decided to drop out after the first meeting and did not participate further.

The CCWG held ten meetings, on Thursdays[2] from 10am-12pm ET, beginning January 22, 2026, and ending March 26, 2026. Notes for all the meetings are attached hereto as Attachment A.

Prior to the last CCWG meeting on March 26, EOE presented to the CCWG a list of all the proposals, along with the voting summaries and commentary. However, the members did not have an opportunity to review this full Report prior to EOE filing it. Therefore, EOE recommends the Authority provide participants with an opportunity to provide written comments on the Report.

B. DISCUSSION PARAMETERS AND VOTING PROCEDURES

Each CCWG member was encouraged to participate in discussions and to make proposals for discussion and voting. EOE also presented proposals for voting based on the discussions and its own recommendations. Each CCWG member was invited to vote on proposals and to provide commentary along with their vote, if desired. Members could vote "yes," "no," or abstain, and were asked to explain any "no" vote or abstention. The votes and comments were recorded in the meeting notes for each of the ten meetings. See Attachment A, meeting notes. A member's absence from a meeting was deemed consent for the purpose of voting on a proposal, with the member's absence from the meeting noted in the vote tally for each proposal.

For purposes of the CCWG, members were encouraged to consent to a proposal even if the proposal was not exactly what the member desired so long as the member was willing to accept the proposal without dissenting. Members were also advised that they could consent to more than one proposal on the same topic so long as they were willing to accept more than one of the proposals. When members preferred one proposal over another, they were encouraged to provide that commentary with their vote.

In one of the early meetings, in order to obtain a clear understanding of how CCWG members are currently calculating financial benefits and costs and production information, the eight contractor members[3] were asked to provide the inputs that each uses as well as the calculation methodologies used to create the financial and production numbers provided to customers leading up to the signing of a contract for installation. Four members provided the information to EOE, who anonymized the information before presenting it to the CCWG for discussions.

During discussions in the CCWG, contractor members shared that there are at least seven different software platforms regularly used in the industry to calculate multiple parameters including average starting utility rate (e.g. Arcadia/Genability), estimated

[2] All meetings were held on Thursdays with the exception of the meeting held on Friday, February 13, 2026, due to the state holiday on Thursday, February 12, 2026, for President Lincoln's birthday and Wednesday, March 4, 2026, due to a scheduling conflict on Thursday, March 5, 2026.

[3] The following CCWG members are referred to herein as "contractors" or "contractor members," even though some of them are more accurately categorized as developers: Earthlight Technologies, GoodLeap, Ion Solar, Ion Solar Pros, SAVKAT, SunRun, Tesla, and Trinity Solar.

annual production (e.g. Aurora, Scanify, Solo, OpenSolar), shading analysis (e.g. PVWatts), and system degradation (e.g. PV Watts).

In addition, both Eversource and UI were asked to provide, and did provide, information regarding which calculations in PowerClerk are manually input by installers and which are automatically calculated by PowerClerk based on other inputs. Only one parameter is automatically calculated by PowerClerk – Estimated Year One Production (kWh) – and that automatic calculation can be overridden with manual input. See Attachment B, PowerClerk Estimated Annual Production Calculation (detailing how PowerClerk calculates annual production).

C. SUMMARY OF PROPOSALS

Three preliminary proposals and 22 specific proposals were presented in the CCWG, with votes being taken on all but one of the proposals. Thus, the CCWG voted on 24 proposals.

The three preliminary proposals were for level-setting purposes only and were used by EOE to determine if members were opposed to or in favor of, in principle only, the Authority standardizing three inputs: starting utility rate, utility escalator rate, and photovoltaic (PV) degradation rate. There were no parameters included in these general, preliminary proposals.

Regarding the twenty-two specific proposals considered by the CCWG, the topics of the proposals can be summarized as follows:

- Standardized calculation of starting utility rate: 2 proposals[4]
- Standardized calculation of utility escalation rate: 3 proposals
- Standardized PV degradation rate: 2 proposals
- Calculating customer's annual electricity usage: 1 proposal
- Standardized calculation of estimated year one net savings: 2 proposals
- Standardized calculation of multi-year net savings: 4 proposals
- Requiring estimated multi-year net savings calculation: 1 proposal
- Changes to Customer Disclosure Forms: 7 proposals

The CCWG reached consensus on six proposals, failed to reach consensus on 17 proposals, and did not vote on one withdrawn proposal. In addition, there was overwhelming support for eight of the 17 non-consensus proposals (e.g. proposals that received at least 11 of 14 votes approving the proposals). Overall, based on the discussions and commentary that accompanied votes on the non-consensus proposals, EOE is providing recommendations that it believes align with the CCWG members' concerns. Below is a table of the proposals, with consensus proposals in **bold**:

[4] Only one of the two proposals was voted on; the second proposal was withdrawn.

Proposal	Topic	Yes	No	Abstain
Prelim 1	**Standardizing Average Starting Utility Rate, in principle (by EOE)**	**14**	**0**	**0**
Prelim 2	**Standardizing Utility Escalation Rate, in principle (by EOE)**	**13**	**0**	**1**
Prelim 3	Standardizing PV Degradation Rate (by EOE)	9	4	1
1	Standardizing calculation of Average Staring Utility Rate (by EOE)	3	10	1
2	Standardizing calculation of Utility Escalation Rate (by EOE)	6	7	1
3	**Standardizing calculation of Customer's Annual Electricity Usage (by EOE)**	**13**	**1***	**0**
4.1	Standardizing PV Degradation Rate (by EOE)	10	4	0
4.2	Standardizing PV Degradation Rate (by EOE)	11	2	1
5	Standardizing PV Degradation Rate (by SunRun)	13	1	0
6	Standardizing Average Starting Utility Rate (by SunRun)	Withdrawn without voting		
7	Standardizing calculation of Utility Escalation Rate	12	2	0
8	Standardizing calculation of Utility Escalation Rate	8	6	0
9	Standardizing calculation of Estimated Year One Net Savings (by EOE)	12	1	1
10	Standardizing calculation of Estimated Multi-Year Net Savings (by EOE)	11	3	0
11	Standardizing calculation of Estimated Year One Net Savings (by Earthlight Technologies)	11	3	0
12	Standardizing calculation of Estimated Multi-Year Net Savings (by Earthlight Technologies	11	3	0
13	Standardizing calculation of Estimated Multi-Year Net Savings (by Earthlight Technologies)	11	3	0
14	Standardizing calculation of Estimated Multi-Year Net Savings (by EOE)	11	3	0
15	Require calculation of Estimated Multi-Year Net Savings (by EOE)	7	6	1
16	**Add checkbox to CDF for Estimated Multi-Year Net Savings**	**14**	**0**	**0**
17	Add terms and definitions to the CDF (by EOE)	12	2	0
18	Add line items for Utility Savings and Solar Costs to CDFs (by EOE)	9	5	0
19	Add checkbox for Financing to CDFs (by EOE)	10	4	0
20	Removing shading information from CDFs	n/a**		
21	**Change terms used on Direct Owner CDF**	**14**	**0**	**0**
22	**Change term used on Third Party Owner CDF**	**14**	**0**	**0**

*See discussion below in Consensus Proposals regarding why this is considered a consensus proposal despite one vote against the proposal.

**See discussion in Other Proposals regarding how the voting and discussion was handled for this proposal.

III. CONSENSUS PROPOSALS

The CCWG reached consensus on six proposals, which are detailed below, including the language of the proposals, votes, and commentary. Two of the proposals were in principle only so do not result in any specific actionable recommendations. The actionable recommendations, detailed in Section VI: Recommendations, relate to changes to the Customer Disclosure Forms (CDFs) and calculating the customer's annual electricity usage for purposes of determining the percentage of usage estimated to be offset by the solar system.

A. STANDARDIZING STARTING UTILITY RATE: PRELIMINARY PROPOSAL 1

At the beginning of the CCWG process, EOE desired to understand whether CCWG members were, in principle, opposed to or in favor of the Authority standardizing certain inputs for use in the Customer Disclosure Forms (CDFs) and contractor compliance filings in the annual RRES contractor compliance docket, Docket No. 2X-08-02RE01, Annual Residential Renewable Energy Solutions Program Review and Rate Setting - Year 202X - Contractor Education and Enforcement. Preliminary Proposal 1 was unanimously accepted by the CCWG.

> *The Contractor Compliance Working Group supports PURA setting a standardized Starting Utility Rate.*

Votes on the proposal were as follows:

- Yes - 14 (4 absent)
- No - 0
- Abstain - 0

It is important to note that several CCWG members made clear that they were not opposed in principle to the Authority standardizing the starting utility rate; however, their future approval or disapproval would be based on the method by which this rate was being calculated or standardized. This played out in later meetings when the method for calculating and standardizing the starting utility rate was discussed and the proposal on the topic did not receive unanimous consent. See discussion of Proposal 1 below.

B. STANDARDIZING UTILITY ESCALATION RATE: PRELIMINARY PROPOSAL 2

Preliminary Proposal 2 was also a general proposal that EOE presented to determine if CCWG members were, in principle, opposed to or in favor of the Authority standardizing the utility escalation rate used in the CDFs and contractor compliance filings. Preliminary Proposal 2 was unanimously accepted by the CCWG.

> *The Contractor Compliance Working Group supports PURA setting a standardized utility rate Escalation Rate.*

Votes on the proposal were as follows:

- Yes - 13 (4 absent)
- No - 0
- Abstain - 1

Similar to comments made regarding Preliminary Proposal 1, several CCWG members made clear that they were not opposed in principle to the Authority standardizing the utility escalation rate; however, their future approval or disapproval would be based on the method by which this rate was being calculated or standardized. This also played out in later meetings when the method for calculating and standardizing the utility escalation rate was discussed and three proposals on the topic were presented, yet none of them received unanimous consent. See discussion of Proposals 2, 7, and 8 below.

C. ADD CHECKBOX FOR MULTI-YEAR NET SAVINGS TO CDFS: PROPOSAL 16

The CCWG considered whether a checkbox should be added to the CDFs to note whether a contractor is providing estimated multi-year net savings to customers. The discussion centered around the need to disclose to customers the PV degradation rate and the utility escalation rate if such multi-year net savings are calculated and provided to customers. Currently, estimated multi-year net savings are not required; they are provided at the discretion of the contractor. Many contractors believe they are necessary, especially for a direct owner solar system purchased outright by the customer without financing. However, other contractors see the multi-year net savings as too speculative and thus do not provide a calculation of such.

To address the need for transparency yet allow contractors to utilize their discretion, EOE presented the following Proposal 16 for the CCWG to consider:

Add Yes/No checkbox for "Are multi-year net savings estimates provided?" to the Direct Owned and Third-Party Owned Customer Disclosure Forms.

If yes is checked, then must include on Customer Disclosure Forms:

a. PV Degradation Rate and

*b. Utility Escalation Rate.**

**As these terms are defined by PURA as a result of the CCWG Report.*

Votes on the proposal were as follows:

- Yes - 14 (3 absent)
- No - 0
- Abstain - 0

Tesla commented with its "yes" vote that it was contingent on the assumption that providing estimated multi-year net savings remained optional. It was EOE's intent for this proposal that the calculation remain optional.

D. CHANGE OF TERMS ON DIRECT OWNER CDF: PROPOSAL 21

The CCWG unanimously voted to accept the following changes, which were proposed by EOE.

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*

Votes on the proposal were as follows:

- Yes - 14 (2 absent)
- No - 0
- Abstain - 0

No comments were made with votes. CCWG members agreed that providing annual savings was more appropriate and useful to customers than trying to calculate monthly savings, in part because it is unclear the term over which the monthly savings should be calculated, e.g. year one, the full RRES term of 20 years, or some other multi-year term.

E. CHANGE OF TERM ON THIRD PARTY OWNED CDF: PROPOSAL 22

The CCWG unanimously voted to accept the following change, which was proposed by EOE.

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 on this proposal were as follows:

- Yes - 14 (2 absent)
- No - 0
- Abstain - 0

No comments were made with votes. During discussions, CCWG members agreed that the utility escalator rate is not relevant to year one net savings; rather, it is applicable when calculating multi-year net savings when the utility escalator rate is applied to the starting utility rate to estimate savings over multiple years.

F. CALCULATING CUSTOMER'S ANNUAL ELECTRICITY USAGE: PROPOSAL 3

EOE proposed a standardized methodology for calculating a customer's annual electricity usage, which is an input used to determine the percentage of the customer's annual electricity usage the solar system is estimated to offset. Proposal 3 was drafted as follows:

To calculate the Customer's Annual Electricity Usage,

a. The following standard methodologies must be used:

i. 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.

ii. 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.

CGB commented in its approval vote that the proposal is clear yet appropriately allows for different options when a customer has less than 12 months of usage. Earthlight echoed CGB's comments and added that it specifically approved of the ability to incorporate additional electrification into the calculation of the customer's annual electricity usage. While Ion Solar and Tesla both approved this proposal, they both voiced concerns with the broad language regarding the methodology for calculating usage for

customers with less than 12-months of actual usage. Votes on Proposal 3 were as follows:

- Yes - 13 (1 absent)
- No - 1
- Abstain - 0

The only CCWG member who voted against this proposal was UI, who stated that this calculation methodology and the RRES Program Manual and "program documents" might conflict. However, UI did not identify any conflicts, and when EOE reviewed the RRES Program Manual and other RRES program documents, it did not identify any conflicts between the calculation methodology in Proposal 3 and the RRES program documents.

Furthermore, while UI did not specify the potential conflict, EOE can surmise that UI may have been concerned that the language of Proposal 3 conflicts with the RRES program requirements that speak to sizing of the system, which is also based on a customer's past usage and allowable additional electronification. However, the two calculations are for different purposes. Proposal 3 is not used to determine the size of the system, but rather to estimate the percentage of annual usage the system (whatever its size) will offset. Therefore, while the calculations are related, they are not the same or for the same purpose and thus there cannot be a conflict between Proposal 3 and the system sizing requirements as stated in the RRES program documents. See Order No. 23, Attachment 11B, RRES FAQs (Project Qualification and System Sizing), Jan. 22, 2026, Docket No. 25-08-02, Annual Residential Renewable Energy Solutions Program Review – Year 5; RRES Program Manual, version 2026.1, pp. 25-26 (Section N: Maximum Qualified System Size).

Accordingly, it is EOE's position that this Proposal 3 should be deemed a consensus proposal.

IV. NON-CONSENSUS PROPOSALS

While the CCWG did not reach consensus on the remaining proposals, eight of the proposals were close to consensus:

Proposal	Topic	Votes in Support
5	Standardizing PV Degradation Rate	13 of 14
7	Standardizing calculation of the Utility Escalation Rate	12 of 14
9	Standardizing calculation of Estimated Year One Net Savings	12 of 14
10, 12, 13, and 14	Standardizing calculation of Estimated Multi-Year Net Savings	11 of 14
17	Adding terms and definitions to the CDF	12 of 14

Even when full consensus was not reached, the discussions and commentary on the proposals have provided EOE with sufficient information to provide actionable recommendations in Section VI: Recommendations. Following is a summary of the remaining proposals, including the language of the proposals, votes, and commentary.

A. STANDARDIZED CALCULATION OF AVERAGE STARTING UTILITY RATE: PROPOSALS 1 AND 6

Two proposals were presented to the CCWG regarding standardizing the calculation of the Average Starting Utility Rate. The Average Starting Utility Rate is used to calculate savings, for year one and multiple years. Only Proposal 1 was voted on. Proposal 6 was withdrawn.

1. STANDARDIZED CALCULATION OF AVERAGE STARTING UTILITY RATE: PROPOSAL 1

Based on discussions in the CCWG, EOE proposed calculating the average starting utility rate based on the rates the Authority currently calculates for each electric distribution company (EDC) in the Annual RRES Docket No. 2X-08-02. These rates are based on an historical weighted average of all residential rates, considering the number of customers on each rate. In Docket No. 25-08-02, the rate was calculated with a look-back period of 16 years, finding that the all-in rate for 2026 for Eversource is $0.3136 and for UI is $0.3583. Final Decision, Appdx B, Residential Tariff Model, Dec. 17, 2025, Docket No. 25-08-02, Annual Residential Renewable Energy Solutions Program Review – Year 5; UI and Eversource Responses to Interrog. CAE-2, Sept. 16, 2025, Docket No. 25-08-02, Annual Residential Renewable Energy Solutions Program Review – Year 5.

The language of Proposal 1 as presented by EOE is:

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.

a. *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.*

b. This proposal does not apply to the calculation of a Customer's Average Starting Utility Rate when that customer is enrolled in LIDR.

Votes on this proposal were as follows:

- Yes - 3 (1 absent)
- No - 10
- Abstain - 1

Earthlight Technologies voted against the proposal, noting that the rate as calculated by the Authority in Docket No. 25-08-02 includes a weighted average covering the last half of the calendar year. Earthlight Technologies asserts that this results in a higher utility rate because the supply rate for electricity is higher in the winter months than in the summer months.

Ion Solar and Ion Solar Pros both voted against the proposal because of the option to provide an additional, customer-specific calculation, noting that offering more than one starting utility rate for calculations could result in customer confusion. SEIA abstained but noted the proposal could cause customer confusion since more than one starting utility rate could be used for calculations. SunRun and Trinity Solar also opposed the proposal because they believed using more than one rate would cause customer confusion.

OCC opposed the proposal, noting that the standardized rate seemed acceptable, but allowing an additional customer-specific calculation methodology may defeat the benefit of providing a standardized starting utility rate. In addition, regarding the optional customer-specific rate, OCC was concerned that calculating the rate using the average all-in utility rate over the past twelve months of actual usage based on the customer's utility bills could inflate savings projections where a customer is using a supplier at a rate higher than standard service.

SAVKAT opposed the proposal, commenting that the starting utility rate should be customer specific and based on the customer's all-in utility rate over the past twelve months of actual usage taken from the customer's utility bills. Trinity Solar and SunRun agreed, stating that customer-specific rates are more accurate. However, SunRun advocated for using the supply rate for standard service, not the customer's actual supply rate, when calculating a customer-specific starting utility rate.

SunRun opposed the proposal, noting that rates change at least twice a year, but this starting utility rate would be in effect for the entire year so it would not change when rates change. SunRun was concerned this would cause customer confusion.

Eversource and UI both opposed the proposal, noting that the starting utility rate should be based on the rates actually available to customers in the market. In discussions, UI advocated for the prevailing all-in rate at the time of contract. UI also opposed Proposal 1 on the grounds that it might conflict with the RRES Program Manual; however, UI did not identify any specific requirement with which it might conflict. In EOE's review of the RRES Program Manual, it found no reference to or usage of a starting utility

rate and thus believes there is no conflict between Proposal 1 and the RRES Program Manual.

2. Standardized Calculation of Average Starting Utility Rate: Proposal 6 (withdrawn)

Proposal 6 regarding standardizing the calculation of the average starting utility rate, presented by SunRun, was not voted on. There was confusion regarding the language of the proposal, so the proposal was withdrawn and the vote postponed until it could be revised and resubmitted for discussion and vote. The proposal was not presented again by SunRun, so no voting occurred.

The language of Proposal 6 is as follows:

The Average Starting Utility Rate used in Customer Disclosure Forms and in 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. If using the 12-month rolling average historical utility rate, the basic service supply rate must be used.

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 on any sales or marketing materials, 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. The utility rate must use the basic service supply rate and not a third-party supplier rate for the applicable months.*

    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.*

B. STANDARDIZED CALCULATION OF UTILITY ESCALATION RATE: PROPOSALS 2, 7, AND 8

The CCWG discussed and voted on three proposals for standardizing the calculation of the utility escalation rate used in CDFs and contractor compliance filings. The utility escalation rate is used to calculate a customer's multi-year net savings and is applied to the average starting utility rate on a compounding basis over the term of years, which is generally the full RRES term of 20 years, though not all contractors use the full RRES term when calculating multi-year net savings.

1. STANDARDIZED CALCULATION OF UTILITY ESCALATION RATE: PROPOSAL 2

EOE presented the following Proposal 2 to the CCWG for consideration:

> *The Utility Escalation 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.*

In Docket No. 25-08-02, the rate was calculated based on a look-back period of 16 years, finding that the average 16-year growth rate was 2.5%. Final Decision, Appdx B, Residential Tariff Model, Dec. 17, 2025, Docket No. 25-08-02, Annual Residential Renewable Energy Solutions Program Review – Year 5; also, UI and Eversource Responses to Interrog. CAE-2, Sept. 16, 2025, Docket No. 25-08-02, Annual Residential Renewable Energy Solutions Program Review – Year 5.

Votes on the proposal were as follows:

- Yes - 6 (1 absent)
- No - 7
- Abstain - 1

Earthlight, Ion Solar, Ion Solar Pros, SunRun, and Tesla opposed the proposal, expressing concern with the 16-year historical average and stating a preference for a 20-year average to match the RRES term of 20 years. Ion Solar Pros also advocated for an EDC-specific utility escalation rate,[5] a concept with which SEIA agreed even though it abstained from voting on the proposal.

CGB supported the proposal, also noting that it was not opposed to basing the rate on a 20-year average – the full RRES term – rather than 16 years. GoodLeap supported the proposal but noted its preference for a 12-year average as opposed to 16- or 20-year average.

[5] Based on the Authority's calculations in Docket No. 25-08-02, Eversource's average escalation rate over the past 16 years is 2.6% while UI's is 2.25%. Final Decision, Appdx B, Residential Tariff Model, Dec. 17, 2025, Docket No. 25-08-02, Annual Residential Renewable Energy Solutions Program Review – Year 5.

SunRun and Tesla, who opposed the proposal, also expressed that they would like contractors to have the ability to use a lower escalation rate than that set by the Authority, noting that using a lower rate would not inflate savings or mislead customers.

Eversource supported the proposal, noting their support did not convey any expectations regarding future utility costs. UI opposed the proposal, noting that a 20-year average may not be equitable and that the utility escalation rate does not take into account many factors.

2. STANDARDIZED CALCULATION OF UTILITY ESCALATION RATE: PROPOSAL 7

SunRun presented Proposal 7, which is similar to EOE's Proposal 2, for calculating the utility escalation rate. There are two primary differences between Proposals 2 and 7: Proposal 2 mandates use of the rate as set by the Authority, which is currently based on a 16-year historical average, whereas Proposal 7 requires that the rate used "be no greater than" the rate set by the Authority and that the rate set by the Authority must be based on a 20-year historical average.

The language of Proposal 7 is as follows:

> *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.*

Votes on the proposal were as follows:

- Yes - 12 (2 absent)
- No - 2
- Abstain - 0

Ion Solar supported this proposal, noting that reliance on a 16-year historical average seems arbitrary and that the Authority has access to 20 years of historical data. See Eversource and UI Responses to Interrog. CAE-2, Sept. 16, 2025, Docket No. 25-08-02, Annual Residential Renewable Energy Solutions Program Review – Year 5. Thus, the average should be based on the same term as the RRES term, i.e. 20 years. Even though Ion Solar preferred that the proposal not include the "no greater than" clause, they nonetheless supported the proposal.

OCC opposed this proposal, stating that the calculation should be based on the Authority's calculation in the annual RRES dockets, which for Docket No. 25-08-02 was a 16-year historical average.

UI opposed this proposal, stating that looking backwards is not the same as looking forwards so it could not support the proposal.

3. STANDARDIZED UTILITY ESCALATION RATE: PROPOSAL 8

In discussions in the CCWG, four of the eight contractors in the group shared that they use a 3% utility escalation rate. Following this discussion, SunRun offered Proposal 8, which proposed a set utility escalation rate of 3% with no optionality:

> *The Utility Escalation Rate used in the Customer Disclosure Forms and in Contractor Compliance Filings must be 3%.*

Votes on this proposal were as follows:

- Yes - 8 (2 absent)
- No - 6
- Abstain - 0

Ion Solar, Tesla, and Trinity Solar opposed this proposal, preferring Proposal 7.

OCC and SEIA opposed this proposal, stating the utility escalation rate should be set annually by the Authority rather than set permanently and should take into account changing historical information.

UI opposed this proposal stating it needed more information.

C. STANDARDIZED CALCULATION OF PV DEGRADATION RATE: PRELIMINARY PROPOSAL 3, PROPOSALS 4 AND 5

The CCWG discussed and voted on one preliminary proposal and two proposals regarding standardizing the calculation methodology of the PV degradation rate on the CDFs and in contractor compliance filings. The PV degradation rate is used in conjunction with the average starting utility rate, utility escalation rate, and production numbers (in kWh) to estimate multi-year net savings and electricity costs offset by the solar system.

1. STANDARDIZING PV DEGRADATION RATE: PRELIMINARY PROPOSAL 3

Like Preliminary Proposals 1 and 2 discussed above (under Consensus Proposals), EOE presented Preliminary Proposal 3 to determine if CCWG members were, <u>in principle</u>, opposed to or in favor of the Authority standardizing the PV degradation rate used in the CDFs and contractor compliance filings. The language of Preliminary Proposal 3 is as follows:

> *The Contractor Compliance Working Group supports PURA setting a standardized Degradation Rate.*

Unlike the other preliminary proposals, there was not consensus among the CCWG members regarding standardizing the PV degradation rate. Ion Solar, Tesla, and Trinity Solar did not support this proposal because they believe a range of rates would be more appropriate, particularly to more accurately account for the range of specific

equipment degradation rates. In addition, Trinity Solar noted that the current volatility in obtaining panels, e.g. FEOC requirements,[6] could pose issues if one standardized rate is utilized across all PV panels.

While Ion Solar Pros supported this proposal in principle, they noted they would support standardization based on equipment specifics but would not support a broad range for all PV panels. Eversource supported the proposal, noting they would support a standardized rate across all PV panels as well as a methodology that allowed rates based on panel specifications.

Votes on the proposal were as follows:

- Yes - 9 (3 absent)
- No - 4
- Abstain - 1

2. STANDARDIZED PV DEGRADATION RATE: PROPOSAL 5

SunRun presented a standardized annual PV degradation rate in its Proposal 5, as follows:

> *The default PV Degradation Rate used in multi-year savings estimates is 0.5%. 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.*

Votes on the proposal were as follows:

- Yes - 13 (3 absent)
- No - 1
- Abstain - 0

Only OCC opposed Proposal 5, stating that it would be better for the Authority to set the annual PV degradation rate based on evidence as described in Proposal 4.1 below.

[6] Under the Foreign Entity of Concern (FEOC) rules, some solar projects must ensure a certain percentage of the manufactured product value comes from non-FEOC source, which means they must not come from companies owned or controlled by China, Russia, Iran, or North Korea.

3. STANDARDIZED CALCULATION OF PV DEGRADATION RATE: PROPOSALS 4.1 AND 4.2

EOE presented Proposal 4 in two parts in an effort to reach consensus, based on voting on prior proposals where CCWG members opposed a proposal because they supported one part but not another part of the proposal. Proposal 4.1 is as follows:

> *The default PV Degradation Rate to be used on Customer Disclosure Forms and in Contractor Compliance Filings will be set by PURA and 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.*

EOE references the ISO-NE NREL Annual Report in Proposal 4 as the basis for this calculation because it is the same basis the Authority utilizes in setting the PV degradation rate in the annual RRES docket. In Docket No. 25-08-02, the annual PV degradation rate was set by the Authority at 0.5%. See Final Decision, Appdx B, Residential Tariff Model, Dec. 17, 2025, Docket No. 25-08-02, Annual Residential Renewable Energy Solutions Program Review – Year 5. However, the Authority relied on the ISO-NE Final 2018 PV Forecast,[7] which is not the most recent PV degradation report from ISO-NE and NREL (National Renewable Energy Laboratory, now known as the National Laboratory of the Rockies). EOE drafted Proposal 4 to refer to the most recent ISO-NE NREL Annual Report, which is entitled "PV Lifetime Project – 2024 NREL Annual Report," wherein the average degradation rate across all panels tested was 0.46%.[8] Rounded to one decimal point, as stated in Proposal 4.1, the annual PV degradation rate would be 0.5%. This is the understanding and information upon which CCWG members determined their votes on Proposal 4.1.

Votes on Proposal 4.1 were as follows:

- Yes - 10 (3 absent)
- No - 4
- Abstain - 0

Earthlight, GoodLeap, SunRun, and Trinty Solar comprised the four votes opposing this proposal, all based on their preference for Proposal 5 (discussed above) over this proposal.

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[7] See Final Decision, Appdx B, Residential Tariff Model, Docket No. 25-08-02, Annual Residential Renewable Energy Solutions Program Review – Year 5, Inputs tab, n. 16 ("0.5% per PURA's Interim Decision in Docket No. 21-08-02. See, ISO-NE report "Final 2018 PV Forecast"; https://www.iso-ne.com/static-assets/documents/2018/03/a03-2018-pv-forecast.pdf.")

[8] The PV Lifetime Project – 2024 NREL Annual Report is available at https://docs.nlr.gov/docs/fy24osti/90651.pdf.

Proposal 4.2 starts with the exact language of Proposal 4.1, but adds optionality to the proposal in the second paragraph, as follows:

> *The default PV Degradation Rate to be used on Customer Disclosure Forms and in Contractor Compliance Filings will be set by PURA and 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.*
>
> *If a contractor wishes to provide a panel-specific PV degradation rate as an optional, additional degradation 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: (Year 1 nameplate rating – Year 25 nameplate rating)/24 years.*

Votes on Proposal 4.2 were as follows:

- Yes - 11 (3 absent)
- No - 2
- Abstain - 1

OCC abstained, noting that it did not have sufficient information to accept Proposal 4.2. Specifically, OCC noted that no one in the CCWG knew if the panel specific degradation rates aligned with the NREL rates; thus, OCC believed the accuracy of the NREL and panel specific rates needed to be determined before voting on the proposal. SunRun and Trinity Solar both opposed this proposal, stating that two different calculations are confusing and not necessary.

D. STANDARDIZED CALCULATION OF ESTIMATED YEAR ONE NET SAVINGS: PROPOSALS 9 AND 11

The CCWG discussed and voted on two proposals for standardizing the calculation of estimated year one net savings as provided on the CDFs and in contractor compliance filings.

1. STANDARDIZED CALCULATION OF ESTIMATED YEAR ONE NET SAVINGS: PROPOSAL 9

After reviewing the calculation methodologies currently used by the four CCWG contractors who provided their information for review, and discussion with the CCWG regarding these and other methodologies, EOE presented Proposal 9 for the CCWG to consider:

> *The methodology for calculating Estimated Year One Net Savings in the Customer Disclosure Form and Contractor Compliance filings will be:*

a. *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] X [Average Starting Utility Rate]*

   ii. *Post-Solar Utility Costs = ((Customer's Annual Electricity Usage – Estimated Year One Production) X Average Starting Utility Rate) + (Solar Production Charge X Estimated Year One Production)*

   iii. *Solar Cost =*

   - *For Direct Owned without financing: cost of the system*
   - *For Direct Owned with financing: total of payments in Year One*
   - *For Third-Party Owned: total of payments in Year One*

c. *Contractor must inform customer that this calculation methodology does not include the value of RECs, if any*

d. *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*

Votes on Proposal 9 were as follows:

- Yes - 12 (5 absent)
- No - 1
- Abstain - 1

This proposal was opposed by only Earthlight Technologies, who did not oppose the entire Proposal 9, but rather opposed the exclusion of the value of RECs and other performance-based incentives. Earthlight noted that the CDF identifies the direct owner of the RECs so contractors should be allowed to show that value as an additional savings for the estimated year one net savings.

Eversource and UI supported the proposal but noted that this calculation methodology does not include the customer charge. Eversource explained that for the purposes of this calculation, excluding the customer charge does not negatively affect the net savings since it is excluded from both the pre-solar and post-solar installation costs. However, if contractors are providing an estimate of expected gross costs ($), then the customer charge will need to be included in the calculations.

SEIA, who abstained, and Tesla, who supported the proposal, both noted that this calculation methodology could deter customers from purchasing a system outright without financing since the estimated year one net "savings" would show as a significant financial loss.

2. STANDARDIZED CALCULATION OF ESTIMATED YEAR ONE NET SAVINGS: PROPOSAL 11

Proposal 11 was presented to the CCWG by Earthlight Technologies. It is identical to EOE's Proposal 9, except that it allows contractors to include "applicable performance-based incentives" in the calculation of estimated year one net savings. Proposal 11 is as follows:

> *The methodology for calculating Estimated Year One Net Savings in the Customer Disclosure Form and Contractor Compliance filings will be:*
>
> *a. 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]*
>
> *ii. 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 =*
>
> - *For Direct Owned without financing: cost of the system*
> - *For Direct Owned with financing: total of payments in Year One*
> - *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.***

Votes on Proposal 11 were as follows:

- Yes - 11 (3 absent)
- No - 3
- Abstain - 0

Eversource and UI opposed this proposal, noting they believe that RECs should be the only adders allowed in this calculation rather than all "performance-based

incentives," which would include other adders and incentives for storage (ESS) as well as solar (RRES). OCC echoed this concern. Tesla opposed the proposal, sharing concerns that the language regarding incentives needed to be refined and highlighting that the term "directly" could prohibit some incentives paid to customers through various arrangements from being included in the calculation.

Ion Solar and Trinity Solar both supported the proposal but noted concerns with the term "performance-based incentives" and suggested the language needed further refinement and clarity to ensure the methodology is correct. SunRun also supported the proposal for including solar performance-based incentives but noted concerns with including ESS incentives.

E. Standardized Calculation of Estimated Multi-Year Net Savings: Proposals 10, 12, 13, and 14

The CCWG considered four proposals regarding how to standardize the calculation of estimated multi-year net savings.

1. Standardized Calculation of Estimated Multi-Year Net Savings: Proposal 10

EOE presented the following Proposal 10 to the CCWG for a standardized calculation methodology for estimating multi-year net savings:

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

The "defined" rates in the proposal refer to the standardized rates that the Authority will set as a result of this Report, if the Authority accepts the recommendations herein. Votes on this proposal were as follows:

- Yes - 11 (4 absent)
- No - 3
- Abstain - 0

Eversource and UI opposed this proposal because they preferred that the length of the term be standardized by the Authority rather than allowing contractors to provide multi-year savings for a term of "up to" 20 years. Ion Solar echoed this concern, voting against the proposal and adding that the term should be set at 20 years. OCC also noted that it believes the term should be standardized to allow customers to compare offers from solar providers.

SAVKAT approved this proposal but noted that it would prefer a term of "up to 25 years" to match the financing term of many solar financial products. However, Trinity Solar, who approved this proposal, noted that it would be opposed to a term beyond 20 years.

SEIA approved this proposal but noted that it would also approve a standard term set at 20 years. SEIA also added that any calculation should include the full costs of the customer's financial products, such as loans, leases, and PPAs, even if those payments (such as end-of-term balloon payments) are not due within the multi-year term for which the contractor is providing estimated multi-year net savings.[9]

2. STANDARDIZED CALCULATION OF ESTIMATED MULTI-YEAR NET SAVINGS: PROPOSAL 14

EOE submitted Proposal 14 to the CCWG, which is identical to its Proposal 10, except that it mandates the term of years over which the multi-year net savings must be calculated – at 20 years (the RRES term):

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

[9] For example, to address SEIA's concern regarding Proposal 10, if a contractor provided estimated multi-year net savings for a period of 10 years, they would need to include any balloon payments due in, e.g. year 15, and any increases in payment amounts, e.g. when payments increase by a percentage annually, even though those payments and increases are not due within the 10-year time period.

Like in Proposal 10, the "defined" rates refer to the standardized rates that the Authority will set as a result of this Report, if the Authority accepts the recommendations herein. Votes on this Proposal 14 were as follows:

- Yes - 11 (3 absent)
- No - 3
- Abstain - 0

Tesla did not support this proposal because it opposes setting the term at 20 years, instead preferring the flexibility to provide multi-year net savings at terms less than 20 years. Tesla also opposed the exclusion of performance-based incentives from the calculation. While Ion Solar and SAVKAT supported setting the term at 20 years, they opposed this proposal because they believe performance-based incentives should be included in estimated multi-year net savings (as in Proposal 13 below). SunRun and Trinity Solar also prefer to include performance-based incentives as provided in Proposal 13; however, they nevertheless support Proposal 14.

3. STANDARDIZED CALCULATION OF ESTIMATED MULTI-YEAR NET SAVINGS: PROPOSAL 12

Earthlight Technologies submitted Proposal 12 to the CCWG, which includes the language identical to EOE's Proposal 10 and adds language related to "applicable performance-based incentives":

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

Like in Proposal 10, the "defined" rates refer to the standardized rates that the Authority will set as a result of this Report, if the Authority accepts the recommendations herein.

Votes on Proposal 12 were as follows:

- Yes - 11 (3 absent)
- No - 3
- Abstain - 0

CGB supported the proposal but noted that it preferred that the term be set at 20 years, rather than being defined as "up to 20 years." Ion Solar supported this proposal but noted concerns with the variable nature of the term ("up to 20 years") as well as lack of clarity for the terms "directly" and "performance-based incentives." Tesla echoed the concerns with the same terms and opposed the proposal even though it supports the flexibility of the term of "up to 20 years."

Eversource and UI opposed this proposal because they believe the term should be set at 20 years rather than being variable at "up to 20 years." UI also noted concerns with the language regarding "performance-based incentives," stating that the term needs clarification. OCC echoed the concerns of both Eversource and UI.

4. STANDARDIZED CALCULATION OF ESTIMATED MULTI-YEAR NET SAVINGS: PROPOSAL 13

Earthlight Technologies also submitted Proposal 13 to the CCWG, in which the language is identical to its Proposal 12 except that it mandates the term of years over which the multi-year net savings must be calculated – at 20 years (the RRES term):

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

Like in Proposal 12, the "defined" rates refer to the standardized rates that the Authority will set as a result of this Report, if the Authority accepts the recommendations herein. Votes on this proposal were as follows:

- Yes - 11 (3 absent)
- No - 3
- Abstain - 0

CGB and Ion Solar both supported this proposal because they believe incentives should be included in savings calculations and setting the term at 20 years aligns with the RRES term. SEIA supported this proposal but raised the same concerns raised in response to Proposal 10: any net savings calculation should include the full costs of the customer's financial products, such as loans, leases, and PPAs, even if those payments (such as end-of-term balloon payments) are not due within the multi-year term for which the contractor is providing estimated multi-year net savings.[10]

Eversource and UI opposed this proposal; while they agree with the term being set at 20 years, they believe that only solar specific incentives should be included in these calculations, and the language as drafted would include storage and other performance-based incentives. OCC echoed the concerns of both Eversource and UI. Tesla also voted against this proposal, even though they agree with the inclusion of performance-based incentives, because they prefer the flexibility in Proposal 13, i.e. the term of "up to 20 years."

F. REQUIRING CALCULATION OF ESTIMATED MULTI-YEAR NET SAVINGS: PROPOSAL 15

EOE presented Proposal 15 to the CCWG, which requires that contractors must provide a multi-year net savings calculation to every customer. Currently, it is up to the contractor whether they provide a multi-year savings calculation. Most contractors estimate multi-year net savings for their customers, especially for customers who are purchasing a system outright (without financing) as the first several years usually result in a financial loss rather than savings. However, some contractors believe multi-year net savings cannot be calculated sufficiently accurately and are too speculative; thus, they do not provide estimates of multi-year net savings to their customers.

Proposal 15 states:

> *Contractors must provide Multi-Year Net Savings* to every customer in their Customer Disclosure Forms** and to PURA in their Compliance Filings.*
>
> ** The methodology for calculating Multi-Year Net Savings will be determined by PURA.*

[10] For example, to address SEIA's concern regarding Proposal 13, if a contractor provided estimated multi-year net savings for the defined period of years, they would need to include any balloon payments due in years 21-25 of the financing term as well as any increases in payment amounts, e.g. when payments increase by a percentage annually, even though those payments and increases are not due within the 20-year time period.

***Provided that PURA includes in the Customer Disclosure Forms a line-item for Multi-Year Net Savings (which currently is not included).*

Votes on the proposal were as follows:

- Yes - 7 (3 absent)
- No - 6
- Abstain - 1

Six of the seven contractors present during the vote on this proposal opposed it: Earthlight Technologies, GoodLeap, Ion Solar, SunRun, Tesla, and Trinity Solar all opposed on the grounds that multi-year net savings should be optional, not required. Earthlight Technologies noted there can be a benefit to showing multi-yet net savings for direct ownership, but it is not necessarily beneficial to show to third party owned projects. GoodLeap, Ion Solar and SunRun were not necessarily opposed to requiring multi-year net savings for solar-only projects, or for the solar portion of projects, but opposed this proposal because it would include solar plus storage projects and the storage portion of those projects. Further, because requiring multi-year savings for only some projects (solar only) or some portion of projects (solar portion of solar and storage projects), Ion Solar expressed concerns this would confuse customers.

SAVKAT, CGB, Eversource, and UI all supported this proposal. SAVKAT noted that it preferred that the calculation be limited to solar-only projects or the solar portion of solar plus storage projects. OCC stated it believes multi-year savings should be required so that all solar contractors provide the same information to customers. SEIA abstained, deferring to the contractors.

G. ADD DEFINITIONS/TERMS TO CDFS: PROPOSAL 17

EOE presented Proposal 17 to the CCWG that would add a section to the CDFs for terms and definitions as well as a fillable text box for alternate calculations, if such calculations are approved by the Authority as a result of this Report. The language of the proposal is:

Add Definitions/Terms section to the Direct Owned and Third-Party Owned Customer Disclosure Forms that will include the following:*

a. Average Starting Utility Rate ($0.0/kWh)

b. Utility Escalation Rate (%)

c. PV Degradation Rate (%)

d. Estimated Year One Net Savings ($)

e. Estimated Multi-Year Net Savings ($)

f. Estimated Year One Production (kWh)

*g. Fillable text box to detail Software Calculations and/or Alternate or Non-standard Calculation Methodologies, if allowed by PURA***

** All terms and definitions will be based on PURA's decision on those terms and definitions.*

*** If PURA determines that alternate or non-standard calculations are not allowed this would not be included in the Definitions/Terms section of the CDFs.*

Votes on Proposal 17 were as follows:

- Yes - 12 (3 absent)
- No - 2
- Abstain - 0

Both Eversource and UI opposed this proposal, not because they oppose definitions and terms, but because they believe the CDFs are long and adding this information will increase the length of the forms. They proposed providing this information elsewhere, such as on their respective websites or in another communication with customers (e.g. in an email). OCC countered that, while it understands the EDCs' concerns, the financial transaction for a solar system is significant, such as equivalent to or greater than purchasing a car, and that documentation for significant financial transactions require more than a simple piece of paper; i.e. OCC was not concerned that the CDF is becoming too long.

All contractors present for this vote supported this proposal, with some comments. Earthlight, GoodLeap, and Trinity Solar supported the proposal as presented. Ion Solar, SunRun, and Telsa agreed with the EDCs' concern that the CDF is already long and this will make it longer; however, they supported the proposal nonetheless. SAVKAT and Tesla supported the proposal but preferred that a "fillable text box" not be included in the CDF as proposed; Tesla further noted that the "fillable text box" could be acceptable if it were only used for showing the calculation of the customer's estimated annual electricity usage when there is less than 12 months of usage.

H. ADD UTILITY SAVINGS AND SOLAR COSTS LINE ITEMS TO CDFS: PROPOSAL 18

In order to provide transparency to customers regarding how their net savings (first year and multi-year) are calculated, EOE presented Proposal 18 to the CCWG to add two line-items to the CDFs, as follows:

Add two line-items for Utility Savings and Solar Costs to the Direct Owned and Third-Party Owned Customer Disclosure Forms.*

**As these terms are defined by PURA as a result of the CCWG.*

Votes on this proposal were as follows:

- Yes - 9 (3 absent)
- No - 5
- Abstain - 0

CGB, Eversource, GoodLeap, SAVKAT, SEIA, and UI supported this proposal without comments. Earthlight Technologies, Ion Solar, SunRun, Tesla, and Trinity Solar all opposed this proposal because they believed this information was redundant and would be confusing to customers. SunRun noted that adding a line item for "utility savings" could be helpful, but, ultimately, opposed adding both terms.

I. ADD CHECKBOX FOR FINANCING TO CDFS: PROPOSAL 19

EOE proposed the following change to the CDFs:

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?"

If yes, then must include on the CDFs the financial escalation terms, including any balloon payments.

Votes are this proposal were as follows:

- Yes - 10 (2 absent)
- No - 4
- Abstain - 0

CGB, Earthlight Technologies, Eversource, GoodLeap, OCC, SAVKAT, SunRun, and UI supported this proposal without commentary, except that SunRun noted that the proposed checkbox and language would not be relevant to third party owned systems. Ion Solar and Trinity Solar opposed the proposal, stating that this information is already provided to the customer. SEIA opposed, noting that financing agreements come from the lender so this could confuse the customer. Tesla opposed because they believed the language was imprecise, noting that more precise language would allow them to support this proposal.

After considering the discussions in the CCWG, EOE agrees that some of the financial terms may be beyond the scope of the contractor's knowledge when the financing option is obtained from a source not provided or introduced by the contractor. In addition, because the terms of financing are controlled by the financing company in financing documents, adding the specific financing terms to the CDF could create confusion and conflicting information. Therefore, EOE believes the checkbox should be added but the financing terms should not be added to the Customer Owned CDF.

V. OTHER PROPOSALS AND DISCUSSION TOPICS

A. TIMING OF PRESENTING CUSTOMER DISCLOSURE FORMS TO CUSTOMERS

The CCWG discussion regarding the timing of presenting the CDFs to customers was complex and lengthy and did not ultimately lead to consensus. While all CCWG members agreed that the CDF should be presented to customers prior to signing a contract for solar installation, there was not consensus between contractors, on the one hand, and consumer advocates, on the other hand, regarding how far in advance of contract signing it should be presented.

The position of the CCWG contractor members and SEIA was that the CDF and the contract should be presented contemporaneously such that the customer is reviewing both the CDF and the contract at the same time. In other words, the CDF would be signed immediately prior to signing the contract. The contractors advocated for this position in part because the CDF and the contract contain the same terms, so they believe it makes sense that the CDF is presented as a kind of summary of the contract terms, or the "front page" of the contract, at the same time as the contract. Contractors made clear that their position is that CDFs are intended to summarize key information so customers are fully informed *at the time of contract execution*.

In addition, during this discussion, the contractors focused on the practical aspects of the timing and how their businesses operate in the field, clarifying that proposal and contract stages are distinct, with proposals requiring minimal and general information as compared to contracts that provide detailed system designs and financing terms, if applicable. As contractors noted, the CDF is not completed at the initial stages of meeting with a customer because the contractor may not have all the necessary information at this initial stage. For example, a shading analysis may not be completed or financing arrangements may not be confirmed at the initial stages of meeting with a potential customer.

When discussing how their companies operate in the field, some contractors represented that they present and close a majority of their sales transactions in a single visit, with documents created and signed during this one visit. Other contractors represented that they begin with an initial contact from a sales representative, who sets up a future meeting with a person who has the requisite installation and contract expertise. At the follow-up meeting, this person presents the customer-specific proposal and then continues to the CDF and contract (if the customer is interested in proceeding). In these scenarios, the contractors state that it would not be possible to provide the CDF in advance as there is no time between proposal and contract closing, unless the customer asks for more time, which would require an additional in-person or virtual visit for CDF and contract signing. In other words, the CDF can be provided more than immediately in advance of the contract only when the customer requests to delay signing the contract. Presumably, the argument goes, if the customer doesn't request additional time, then none is needed.

While these practical aspects are not necessarily contrary to customer interests, they focus more on efficiency of process and how efficiency itself supports a positive customer experience. The CCWG contractor members also pointed out that, even in these scenarios, their contracts for solar installation have a three-day rescission period, which provides customers with the time needed to re-review the CDF and cancel the contract if they choose to do so.

In contrast to the position taken by the contractors, OCC focused more on ensuring that customers had sufficient time to review the information in advance of signing a contract for installation as well as the opportunity to compare offers from more than one contractor. However, if solar contractors are proposing and closing on contracts in a single visit, there is no opportunity for comparing offers across multiple contractors. Nevertheless, not all transactions are closed in a single visit; thus, for customers who wish to compare offers, they need information sufficiently in advance of contract signing in order to do so.

In an effort to find common ground between the position of the contractors on one side and the position of OCC on the other, as well as comply with the Authority's position as stated in Docket No. 25-08-02,[11] EOE ascertained from the CCWG members relevant technical information about the sales process. CCWG members shared that sales proposals and contracts are typically generated through contractor systems rather than through PowerClerk, whereas the CDF is preferably generated in PowerClerk. However, sales personnel, who are usually the first point of contact with a consumer, generally do not have access to PowerClerk. Rather, operations teams input information into PowerClerk as part of interconnection applications, which is a process that occurs *after* a contract is signed.

Thus, in order for CDFs to be presented prior to or contemporaneously with installation contracts, the CDFs must be generated outside of PowerClerk, e.g. in a duplicate electronic version in the contractor's CRM that can be filled in and signed electronically, or printed from PowerClerk and filled in manually and wet-signed by hand. Then the completed form is uploaded to PowerClerk. While this process allows for creation of the CDF prior to submitting an interconnection application in PowerClerk, it also increases the risk of transcription errors when the information is entered into PowerClerk.[12]

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[11] "The Authority also concurs with EOE and other stakeholders that customers should be provided with complete financial and production documentation before the customer signs an installation contract." Final Decision, Dec. 17, 2025, Docket No. 25-08-02, Annual Residential Renewable Energy Solutions Program Review – Year 5, p. 20.

[12] The CCWG also discussed submitting an interconnection application in PowerClerk earlier in the process, e.g. at the proposal stage and well before contract signing, so that the CDF could be fully generated through PowerClerk. This was ultimately an unworkable solution for several reasons, with the primary one being that Clean Power Research charges the EDCs a fee per interconnection application in PowerClerk, and this early application process would likely result in many abandoned applications for which the EDCs were charged a fee (which ultimately is a cost passed on to ratepayers and/or other interconnection applicants).

In an attempt to formulate ideas that could lead to a proposal that might receive broad acceptance by the CCWG, EOE suggested that the CDF be sent via email ahead of the visit to the customer in which the contract would be signed. This seemed reasonable to EOE, much like mortgage documents when purchasing a house are sent to the consumer in advance of the transaction, even if they will require further changes before signing. However, as discussed above, several contractors noted that their current business practices do not align with this concept and do not provide for even one day between proposal and contract signing, and that oftentimes all the information required on the CDF is not available until the contract is drafted and ready for signature.

Lastly, it was noted in discussions that the later in the sales process the CDF is presented to a customer, the more accurate it is likely to be. Thus, the timing of the presentation of the CDF to the customer is also a balance between early enough for customer understanding and transparency while late enough to accurately reflect the terms of the transaction.

B. REMOVING SHADING INFORMATION FROM THE CDFS: PROPOSAL 20

EOE presented Proposal 20 regarding removing shading analysis from the CDFs. The CDFs currently contain two line-items regarding shading: (1) a yes/no checkbox asking if a shading analysis has been completed for the property; and (2) a question asking how much production is expected to be lost due to shading (%).

The language of Proposal 20 is as follows:

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

Rather than straight voting, i.e., yes, no, or abstain, EOE suggested that members could instead state their preferences, in part because the proposal encompasses two line-items on the CDF and some CCWG members expressed they had differing opinions regarding the two items. For purposes of tallying the votes, any member who stated only a preference without a yes/no vote was marked as abstaining. This proposal could be deemed a consensus proposal because there were not any dissenting votes; however, in the interest of fairness, it is not being categorized as a consensus vote since some members expressed confusion regarding the voting process.

Votes on this proposal were as follows:

- Yes - 9 (3 absent)
- No - 0
- Abstain - 5

Earthlight Technologies, Ion Solar, SAVKAT, SunRun, and Trinity Solar supported the proposal in full. Ion Solar noted that the shading analysis information could be included in the estimated year one production (kWh). SAVKAT and Trinity Solar noted

that the definition for estimated production (if one were added) could include a statement that shading was considered.

CGB and UI were in favor of removing the checkbox but were against removing the question regarding the amount of production expected to be lost due to shading. Similarly, GoodLeap was in favor of removing the checkbox, stating that there is always a shade analysis, but advocated for including a line item regarding the percentage of shade expected. Tesla, however, advocated for the exact opposite: in favor of keeping the checkbox but removing the question regarding the amount of production expected to be lost due to shading.

Eversource stated it would support removing the two shading line items but only if they were replaced with a single, new line item to confirm that shading was considered in the production estimates.

SEIA believed the two line-items could be removed because they provide insufficiently nuanced information regarding shading. SEIA proposed that shading information should be provided in a definition (in some customer-facing document such as the CDFs) so that it is fully explained to customers. UI also supported including the shading information in the definitions.

VI. RECOMMENDATIONS

Based on the Proposals, votes, discussions, and commentary, EOE makes the following recommendations.

A. RECOMMENDED STANDARDIZED TERMINOLOGY

Throughout the CCWG, EOE and members iterated on the exact terminology to be used in the CDFs and contractor compliance filings. Thus, some of the proposals use different terminology for the same terms. By the end of the CCWG, though formal votes were not taken, EOE believes the CCWG agreed on the appropriate terms to be used; or, at least, members were not opposed to the use of certain standardized terms. Accordingly, EOE recommends that the following terminology be used consistently throughout the CDFs and contractor compliance filings.

- Average Starting Utility Rate ($0.0/kWh)
- Utility Escalation Rate (%)
- PV Degradation Rate (%)
- Estimated Year One Net Savings ($)
- Estimated Multi-Year Net Savings ($)
- Estimated Year One Production (kWh)

B. RECOMMENDED CHANGES TO CDFS: PROPOSALS 16, 17, 19, 21, AND 22

EOE recommends that the Authority implement consensus Proposals 16, 21, and 22, and Proposals 17 and 19 (in part), all of which propose changes to certain line items

on the CDFs. Taking into account the standardized terms recommended above, the recommended changes to the CDFs are described below and in the redlines of the CDFs, attached hereto as Attachments C (Direct Owner CDF) and D (Third Party Owner CDF).

1. Multi-Year Net Savings Checkbox: Consensus Proposal 16

As a result of consensus Proposal 16, EOE recommends adding a line item to the CDFs (both Direct Owner and Third Party Owner) with a Yes/No checkbox for "Are multi-year net savings estimates provided?" As a part of this addition, language denoting that if "yes" is checked, the line items for PV Degradation Rate and Utility Escalation Rate must be completed on the CDF. While it was not explicitly voted on as part of this proposal, inherent in this recommendation is the need to add a line item to the CDFs for the PV Degradation Rate.

EOE recommends that this change to the CDFs be made as soon as possible, but no later than July 1, 2026. EOE also recommends that these changes to the CDFs be carried over to the RRES successor program.

2. Adding Terms & Definitions: Proposal 17

EOE recommends adding a terms and definitions section to the CDFs as provided in Proposal 17. The proposal was opposed by only Eversource and UI, both expressing concerns that the CDFs are currently very long and should not be made longer. However, EOE agrees with OCC's position, which is that customers need transparent and explicit information when making a significant purchase; thus, the minimally increased length is not a sufficient reason to avoid transparency. Accordingly, EOE recommends that the following terms with definitions be added to the CDFs:

a. *Average Starting Utility Rate ($0.0/kWh): This rate is the average rate paid per kWh in the past for electricity. The standardized rate is set annually by the Authority for each electric distribution company (EDC) based on the EDCs' historical retail electricity rate data. The standardized rate is a weighted average of all rate classes and may not reflect the customer's actual average utility rate. The rate may also be calculated by (i) averaging the customer's all-in utility rate over the past 12 months of actual usage utilizing the customer's utility bills, or (ii) utilizing software designed to make this calculation. If either of these non-standardized methods are used, contractor must detail all parameters of the methodology and any parameters that are not included in the methodology. The parameters that must be explained include distribution rate, transmission rate, supply rate, non-bypassable charges, discounts (including LIDR), sources of the information, and a statement of whether the customer's rate is different than the current standard service rate.*

b. *Utility Escalation Rate (%): The Utility Escalation Rate is the percentage at which the utility rate is estimated to increase in the future, which is*

currently [#.#]%. It is set by the Authority annually based on the 20-year historical compound annual growth rate derived from data provided by the electric distribution companies (EDCs). It is the maximum rate that a contractor can use to estimate multi-year net savings.

c. *PV Degradation Rate (%): Photovoltaic (PV) Degradation Rate is the annual percentage decline in a solar panel's power output. The Authority sets a standardized PV Degradation Rate based on NREL's most recent analysis of PV lifetime performance, to one decimal point, which is 0.5%. A contractor may apply a different PV Degradation Rate so long as it is substantiated by the manufacturer's data sheet for the specific panels chosen by the customer.*

d. *Estimated Year One Net Savings ($): Estimated Year One Net Savings = [Pre-Solar Utility Costs] - [Post-Solar Utility Costs] + [Solar Cost].*

   Pre-Solar Utility Costs = [Customer's Annual Electricity Usage] X [Average Starting Utility Rate]

   Post-Solar Utility Costs = ((Customer's Annual Electricity Usage – Estimated Year One Production) X Average Starting Utility Rate) + (Solar Production Charge X Estimated Year One Production)

   Solar Cost for Direct Owner without financing = cost of the system

   Solar Cost for Direct Owner with financing = total of payments in Year One

   Solar Cost for Third-Party Owner = total of payments in Year One

   This calculation does not include the value of RECs, if any.

e. *Estimated Multi-Year Net Savings ($): These savings are calculated by starting with the Estimated Year One Net Savings and, over the RRES term of 20 years, (i) increasing the utility rate by the Utility Escalation Rate; (ii) decreasing the annual production by the PV Degradation Rate; and (iii) if the system is financed (loan, lease, or PPA), adjusting the financing payments by the applicable financial escalations, including any balloon payments, even if those costs will occur in years 21-25 of the financing arrangement.*

f. *Estimated Year One Production (kWh): This number is the number of kilowatt hours (kWh) your installed solar system is estimated to produce in the first year it is operational. It is calculated based on all or of some of the following variables: equipment, irradiance data of location, weather data for location, temperature losses, losses for DC wiring and mismatch, shading, tilt, azimuth, DC/AC conversion losses, and inverter efficiency. If PowerClerk was used to calculate Estimated Year One*

Production, it was calculated as described in "PowerClerk Estimated Annual Production Calculation" by Clean Power Research (attached). If it was calculated by the solar contractor, the method by which the Estimated Year One Production was calculated must be described in writing in the fillable textbox of this CDF.

g. *Fillable text box to detail Software Calculations and/or Alternate or Non-standard Calculation Methodologies*

h. *Customer's Annual Electricity Usage:*[13] *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, PLUS, any allowable additional electrification measures as provided for in the RRES Program Manual for the applicable year. For customers with less than 12 months of usage at the property at which the system is being installed, the contractor must explain in writing to the customer in the CDF the methodology used for calculating this usage, including the methodology used by any software.*

EOE recommends that the definitions and term section be added to the CDFs as soon as possible, but no later than July 1, 2026. EOE also recommends that these changes to the CDFs be carried over to the RRES successor program.

3. Adding a Checkbox to the Direct Owner CDF regarding Financing: Proposal 19

As a result of Proposal 19, and based on the analysis above, EOE recommends that the first portion of the proposal be implemented as an addition to the Direct Owner CDF. Specifically, EOE recommends the following language:

> *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? If yes, contractor confirms the financing terms have been discussed with customer."*

However, because the terms of financing are controlled by the financing company in financing documents, EOE does not recommend requiring on the CDF that contractors also provide the financial escalation terms, including any balloon payments. Because this information will be included in the Estimated Year One and Multi-Year Net Savings, including them here is not necessary. The last portion of the proposed language – "contractor confirms the financing terms have been discussed with customer" – was not included in the proposal voted on by CCWG members, but is necessary to ensure transparency in financing terms.

[13] This was not part of Proposal 17. However, the methodology for calculating the customer's annual electricity usage was voted on and accepted in Proposal 3.

EOE recommends that this change to the CDF be made as soon as possible, but no later than July 1, 2026. EOE also recommends that this change to the CDF be carried over to the RRES successor program.

4. Replacing Average Monthly Savings on Direct Owner CDF: Consensus Proposal 21

As a result of consensus Proposal 21, EOE recommends the following changes to the Direct Owner CDF:

From (currently on the CDF)	*To (recommended change to CDF)*
Estimated net average monthly savings ($)	*Customer Estimated Year One Net Savings*
Starting Utility rates used to estimate net average monthly savings	*Starting Utility Rate used to estimate Customer Year One Net Savings*
Escalator rate used to estimate net average monthly savings	*Utility Escalator Rate used to estimate Multi-Year Net Savings*

EOE recommends that these changes to the CDF be made as soon as possible, but no later than July 1, 2026. EOE also recommends that these changes to the CDF be carried over to the RRES successor program.

5. Terminology Change to Third Party Owner CDF: Consensus Proposal 22

As a result of consensus Proposal 22, EOE recommends the following change to the Third Party Owner CDF:

From (currently on the CDF)	*To (recommended change to CDF)*
Escalator rate used to estimate net year one savings	*Utility Escalator Rate used to estimate Multi-Year Net Savings*

EOE recommends that this change to the CDF be made as soon as possible, but no later than July 1, 2026. EOE also recommends that this change to the CDF be carried over to the RRES successor program.

6. Removing Shading Analysis from the CDFs: Proposal 20

At this time, given the lack of consensus and clear solution for how to ensure customers clearly understand whether a shading analysis was conducted and the effect on their expected annual production, EOE does not recommend removing the two line-items regarding shading from the CDFs. Thus, EOE recommends that both the following line-items remain in the CDFs: (1) yes/no checkbox asking if a shading analysis has been completed for the property; and (2) question asking how much production is expected to be lost due to shading (%).

C. RECOMMENDATION FOR CALCULATING CUSTOMER'S ANNUAL ELECTRICITY USAGE: CONSENSUS PROPOSAL 3

As a result of consensus[14] Proposal 3, EOE recommends that the methodology for calculating a customer's annual electricity usage for the purpose of determining the percentage of the customer's usage the installed solar system is estimated to offset, should be standardized as stated below.

To calculate the Customer's Annual Electricity Usage,

a. The following standard methodologies must be used:

i. 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.

ii. 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.

EOE recommends that the standardized calculation methodology for Customer's Annual Electricity Usage take effect no later than January 1, 2027. EOE also recommends that this standardized calculation methodology be carried over to the RRES successor program.

D. RECOMMENDATION FOR CALCULATING UTILITY ESCALATION RATE: PROPOSAL 7

EOE recommends that the Authority standardize the Utility Escalation Rate used in the CDFs and contractor compliance filings based on the language of Proposal 7. Of the three proposals for this input, Proposal 7 was approved by 12 of 14 CCWG members

[14] As noted above in the detailed description of Proposal 3, UI did not support this proposal. However, for the reasons discussed above – namely that UI was opposed based on a conflict that EOE confirmed does not exist – EOE recommends that this proposal be treated as a consensus proposal. See Section III above.

(compared to Proposal 2, which was approved by 6 members, and Proposal 8, which was approved by 8 members).

The Utility Escalation Rate is used by contractors to calculate a customer's multi-year net savings and is applied to the starting utility rate on a compounding basis over the term of years, which is generally the full RRES term of 20 years.

In order to standardize the Utility Escalation Rate, EOE recommends that the Authority set the rate in its annual RRES docket, No. 2X-08-02, based on the 20-year historical compound annual growth rate derived from the data provided by the EDCs in that docket. In Docket No. 25-08-02, that would be the data provided by the EDCs in response to Interrogatory CAE-2. See Eversource and UI Responses to Interrog. CAE-2, Sept. 16, 2025, Docket No. 25-08-02, Annual Residential Renewable Energy Solutions Program Review – Year 5. Because the RRES term is 20 years, it seems reasonable that the Utility Escalation Rate would also be based on an historical 20 years, a conclusion with which all contractors in the CCWG agreed.

EOE recognizes that this may require the Authority to calculate two different escalation rates given that the Authority most recently made its calculation for its Residential Tariff Model based on a 16-year historical period rather than 20 years; i.e. the Authority would calculate an escalation rate utilized in its Residential Tariff Model (presumably based on 16 years) and a second rate based on 20 years to be used by solar contractors for this standardized Utility Escalation Rate.

EOE recommends that the standardized Utility Escalation Rate be rounded to one decimal point and that the same Utility Escalation Rate apply to both Eversource and UI for the sake of simplicity and because the rates between the two EDCs vary by only 0.3% (based on the historical 16-year average calculated in Docket No. 25-08-02). See Final Decision, Appdx B, Residential Tariff Model, Dec. 17, 2025, Annual Residential Renewable Energy Solutions Program Review – Year 5 (Eversource's average escalation rate is 2.6% while UI's is 2.3%).

Final Decision, Appdx B, Residential Tariff Model, Tab "EDC Rates"

	Eversource CAE-2 average rate per year			UI CAE-2 average rate per year						
	Year	Rate 1	Rate 5	Rate 7	Year	Rate R	Rate RT				
	2009	20.3102	19.3579	19.4043	2009	0.24139	0.2238	2009	-1.07%	-6.22%	
	2010	19.0467	18.1599	18.1393	2010	0.23881	0.21913	2010	-3.56%	-7.16%	
	2011	17.6836	16.825	16.7338	2011	0.2303	0.21126	2011	-5.84%	-6.10%	
	2012	16.6045	15.7245	15.6506	2012	0.21686	0.1975	2012	0.84%	-2.10%	
	2013	16.2555	15.352	15.3316	2013	0.21867	0.19471	2013	5.98%	14.18%	
	2014	18.5601	17.668	17.6148	2014	0.23175	0.2077	2014	10.80%	5.40%	
	2015	19.5629	18.6232	18.4544	2015	0.25679	0.22986	2015	-7.85%	-0.82%	
	2016	19.4025	18.1884	18.2193	2016	0.23663	0.20984	2016	6.48%	1.04%	
	2017	19.605	18.3644	18.4368	2017	0.25196	0.21836	2017	6.58%	4.30%	
	2018	20.4481	19.2806	19.4265	2018	0.26852	0.2343	2018	1.05%	4.98%	
	2019	21.4654	20.3229	20.521	2019	0.27135	0.23408	2019	1.60%	3.53%	
	2020	22.2233	20.9581	21.255	2020	0.27569	0.24154	2020	-4.58%	-2.44%	
	2021	21.6811	20.3613	20.6931	2021	0.26307	0.22917	2021	4.99%	19.75%	
	2022	25.9628	24.5704	24.9743	2022	0.2762	0.24172	2022	23.01%	23.46%	
	2023	32.055	30.668	31.1043	2023	0.33975	0.30963	2023	5.21%	-6.68%	
	2024	29.9136	28.3369	28.8397	2024	0.35745	0.32126	2024	-2.18%	2.31%	
weighted average[1] ->	2025	30.6057	28.8775	29.5102	2025	0.34966	0.31468				
forecast[2] ->	2026	0.31357			2026	0.35825			2.59%	2.96%	2.78%
		2.6%	2.5%	2.7%		2.3%	2.2%			2.5%	Avg. 16-Year Growth Rate

[1]Averages Jan-June 2025 rates with rates effective July 1, 2025 and September 1, 2025 to calculate full year average
[2]Applies 16-year growth rate to 2025 retail rates to estimate 2026 rates

When utilizing the standardized Utility Escalation Rate for calculations of a customers' estimated multi-year net savings, contractors may use a rate "no greater than" the standardized rate set by the Authority, as stated in Proposal 7. Thus, if a contractor wishes to provide a more conservative estimate of multi-year net savings, it may use a Utility Escalation Rate less than that set by the Authority, but it may not inflate savings by using a Utility Escalation Rate greater than the standardized rate set by the Authority.

EOE recommends that the standardized Utility Escalation Rate take effect no later than January 1, 2027, and that it be set annually by the Authority in Docket No. 2X-08-02, to be effective January 1 to December 31 of the following year. EOE also recommends that this standardized rate be carried over to the RRES successor program.

E. RECOMMENDATION FOR CALCULATING PV DEGRADATION RATE: PROPOSALS 4 AND 5

EOE recommends that the Authority standardize the PV Degradation Rate by combining Proposals 4 and 5. Based on the votes and discussions regarding PV Degradation Rate, CCWG members were nearly unanimously in favor of setting the PV Degradation Rate at 0.5% provided that contractors were also allowed to instead use the degradation rate of specific panels based on the manufacturer's data sheet. This was evidenced by the votes on Proposal 5. However, OCC opposed Proposal 5 because it preferred that the degradation rate be set based on data rather than in a manner that seemed arbitrary. EOE agrees.

In addition, each of the contractors who opposed Proposal 4.1 did so not because they opposed the use of data proposed as the basis for setting the PV degradation rate, but because they preferred having the option to utilize the degradation rate of specific panels. The opposition to Proposal 4.1 was thus based on the lack of optionality, and the

opposition to Proposal 4.2 was based on the language requiring two calculations. See the votes and comments on Proposals 4.1, 4.2, and 5 in Section IV.C. above.

Therefore, EOE recommends that the Authority set the standardized PV Degradation Rate based on the analysis of "ISO-NE in its most recent NREL Annual Report with its most recent analysis of PV lifetime performance, to one decimal point." See Proposal 4.1. Currently, that rate is 0.5%. See PV Lifetime Project – 2024 NREL Annual Report, available at https://docs.nlr.gov/docs/fy24osti/90651.pdf.

Degradation Rate: PV Lifetime Project-2024 NREL Annual Report

Median	Average
0.15	0.5
0.22	0.55
0.23	0.36
0.24	0.43
0.32	0.32
0.34	0.42
0.36	0.15
0.39	0.22
0.42	0.39
0.43	0.34
0.5	1.86
0.55	0.23
1.86	0.24
	0.46

Table 2. Overall change in performance [%] over the deployment period

Manufacturer	Module type	Year deployed	Pmp Median [Annual %/yr]	Pmp Median	Voc Median	Isc Median	FF Median
Jinko	JKM260	10/2016	-0.50	-3.92	-1.27	-2.30	-0.26
Jinko	JKM265	10/2016	-0.55	-4.06	-1.10	-1.95	-1.05
Trina	TSM255	10/2016	-0.36	-2.55	-0.71	-0.84	-1.04
Trina	TSM260	10/2016	-0.43	-3.25	-0.74	-1.40	-1.17
Q-Cells	Qplus280	10/2017	-0.32	-1.97	-0.72	0.31	-1.58
Q-Cells	Qpeak290	10/2017	-0.42	-2.76	-1.31	-0.81	-0.71
Mission Solar	MSE360	12/2018	-0.15	-0.73	-0.08	-0.27	-0.65
LG	LG320N1K	8/2018	-0.22	-1.44	-0.52	-0.21	-0.39
Canadian Solar	CS6K-300MS	8/2018	-0.39	-1.83	-1.53	0.18	-0.52
Panasonic	VBHN330	6/2018	-0.34	-2.06	-1.50	0.43	-0.63
SunPreme	HxB-400	3/2019	-1.86	-7.88	-1.63	-6.52	-0.26
LONGi	LR6-72BP-360M	11/2020	-0.23	-0.62	-0.11	-0.43	-0.13
LONGi	LR6-72PH-365M	11/2020	-0.24	-1.08	-0.39	-0.07	-0.51

Again, EOE recognizes that this may require the Authority to calculate two different PV degradation rates given that the Authority has continued to rely on the degradation rate determined in its Interim Decision in Docket No. 21-08-02, which relied on an older version of the ISO-NE NREL report (from 2018). Nevertheless, EOE believes the most recent data provides a more accurate degradation rate given changing technology.

In addition, as allowed in Proposal 5, EOE recommends that contractors be allowed to use an alternative degradation rate, in lieu of the standardized PV Degradation Rate, provided it is substantiated by the manufacturer's data sheet for the specific panels chosen by the customer, and it is explained in writing to the customer and in the contractor compliance filings documents. To be clear, EOE recommends that only one PV Degradation Rate be used to avoid consumer confusion (either the standardized PV Degradation Rate or the degradation rate for the specific panels based on the manufacturer's data sheet).

EOE recommends that the standardized PV Degradation Rate and alternate methodology take effect no later than January 1, 2027. Regarding the standardized PV Degradation Rate, EOE recommends that it be set annually by the Authority in Docket No. 2X-08-02, to be effective January 1 to December 31 of the following year. EOE also recommends that this standardized rate be carried over to the RRES successor program.

F. RECOMMENDATION FOR CALCULATING ESTIMATED YEAR ONE NET SAVINGS: PROPOSAL 9

EOE recommends adopting in full the language of Proposal 9 as the standardized methodology for calculating Year One Net Savings. Proposal 9 was supported nearly unanimously by the CCWG members, with one member (Earthlight Technologies) opposing only the last portion of the proposal, which stated that the value of RECs, if any, would not be included in the calculation. Proposal 9 does, however, allow a contractor to provide an additional calculation that includes the value of RECs if they wish to provide a second calculation.

Thus, EOE recommends the Authority standardize the methodology for calculating Estimated Year One Net Savings in the Customer Disclosure Form and Contractor Compliance filings as follows:

a. *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] X [Average Starting Utility Rate]*

   ii. *Post-Solar Utility Costs = ((Customer's Annual Electricity Usage – Estimated Year One Production) X Average Starting Utility Rate) + (Solar Production Charge X Estimated Year One Production)*

   iii. *Solar Cost =*

      - *For Direct Owned without financing: cost of the system*
      - *For Direct Owned with financing: total of payments in Year One*
      - *For Third-Party Owned: total of payments in Year One*

c. *Contractor must inform customer that this calculation methodology does not include the value of RECs, if any*

d. *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*

This methodology avoids the confusion expressed by CCWG members in comments about including "performance-based incentives" in the Estimated Year One Net Savings, as provided in Proposal 11, and the unclear meaning of that phrase. This methodology also does not prevent contractors from providing an additional calculation if they believe including RECs would provide a more accurate calculation of the customer's Estimated Year One Net Savings. However, EOE also recommends that, if the Authority

allows contractors to provide an additional calculation that includes the value of RECs, contractors must note that the value of and receipt of RECs is speculative and not fully known at the time of contract.

If the Authority adopts this standardized calculation methodology for Estimated Year One Net Savings, EOE believes that the changes to the CDFs provided in Proposals 18 and 19[15] are unnecessary and duplicative given the transparency provided by this standardized calculation methodology.

EOE recommends that the standardized calculation methodology for Estimated Year One Net Savings take effect no later than January 1, 2027. EOE also recommends that this standardized calculation methodology be carried over to the RRES successor program.

G. Recommendation for Calculating Estimated Multi-Year Net Savings: Proposals 14 and 15

EOE does not recommend that Estimated Multi-Year Net Savings be required, as provided in Proposal 15. Rather, EOE recommends that if contractors choose to provide Estimated Multi-Year Net Savings, they must provide it over the full RRES term of 20 years and that RECs and other performance-based incentives not be included in the calculation.

Regarding making the provision of Estimated Multi-Year Net Savings mandatory, EOE appreciates the viewpoints shared by various CCWG members against requiring it. First, many contractors identified an issue with providing complicated multi-year net savings in projects that are solar plus storage, as the multi-year savings are generally calculated based only on the solar portion of the project, in part because installing storage is often not a decision made with an expectation of saving money. There are other benefits, such as resiliency and reliability, for installing storage as part of a solar project. This creates an issue as to how to calculate savings; for example, would multi-year net savings be required only for solar projects? Or only for the solar portion of solar plus storage projects? The CCWG was focused on RRES solar projects, not the ESS program and storage projects; thus, the questions raised could not be sufficiently answered to make a recommendation on how to calculate multi-year savings in projects that include storage. In addition, for customers who are purchasing only a solar system outright without financing, many contractors want to provide multi-year net savings to show the customer their "break even" point where they recoup their initial outlay of funds. In this scenario, mandating the calculation has no practical effect as it is already being provided.

Given the focus of the CCWG, at this time EOE does not recommend mandating contractors provide Estimated Multi-Year Net Savings. If contractors wish to provide

[15] Proposal 18 sought to add to the CDFs new line items for utility savings and solar costs. Proposal 19 sought to add a checkbox regarding financing (which is not relevant to the Third Party Owner CDF) as well as line items for financial escalation terms, which are arguably beyond the scope of the contractor's knowledge and should be provided by the financing company.

Estimated Multi-Year Net Savings, EOE recommends the Authority adopt Proposal 14 as the standardized calculation methodology:

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

The four proposals for Estimated Multi-Year Net Savings each received the same numbers of votes in favor (11) and opposed (3). Proposal 14 was opposed by Tesla in part because they believed the term should be flexible, preferring the "up to 20 years" language in Proposals 10 and 12. Because providing multi-year net savings is not required, contractors have the ability to not provide a multi-year net savings calculation if they do not want to provide net savings based on the full RRES term of 20 years, as required in Proposal 14.

In addition, Proposal 14 was opposed by Tesla, Ion Solar, and SAVKAT, and was not preferred by SunRun and Trinity Solar, because the proposal does not include "performance-based incentives" in the calculation methodology. Thus, only Tesla was opposed to setting the term at 20 years (as opposed to "up to 20 years") and other CCWG members – CBG, OCC, SEIA, Eversource, and UI – all preferred defining the term at 20 years.

Furthermore, as discussed above regarding the calculation methodology for Estimated Year One Net Savings, the methodology provided in Proposal 14 avoids the confusion expressed by CCWG members in comments about including "performance-based incentives" in this calculation and the unclear meaning of that phrase.

EOE recommends one addition to Proposal 14 that was not voted on in the CCWG, but that was raised by several members and stated clearly by SEIA in its comments when voting on Proposal 13: any net savings calculation should include the full costs of the customer's financial products, such as loans, leases, and PPAs, even if those payments (such as end-of-term balloon payments) are not due within the 20-year term. This issue arises because many solar financing agreements have a 25-year term, which is longer than the 20-year RRES term. Therefore, EOE recommends that in addition to the language of Proposal 14, the Authority require an additional bottom line calculation (i.e. it need not be broken down by year like the 20-year net savings) that reflects the full costs of the customer's financial product.

If the Authority adopts this standardized calculation methodology for Estimated Multi-Year Net Savings, EOE believes that the changes to the CDFs provided in Proposals 18 and 19[16] are unnecessary and duplicative given the transparency provided by this standardized calculation methodology.

EOE recommends that the standardized calculation methodology for Estimated Multi-Year Net Savings take effect no later than January 1, 2027. EOE also recommends that this standardized calculation methodology be carried over to the RRES successor program.

H. RECOMMENDATIONS REGARDING THE AVERAGE STARTING UTILITY RATE

Setting the starting utility rate by which to calculate Estimated Year One Net Savings, and then Multi-Year Net Savings, was the most challenging topic discussed in the CCWG, with no consensus reached. There are several methodologies that could reasonably be used to standardize the Average Starting Utility Rate, and each of them provides benefits and drawbacks.

The two main methodologies discussed by the CCWG are both historical and can be described as (1) the calculation of an average rate across all customers, or some subset of customers, and (2) a customer-specific calculation based on each customer's actual rates. The benefit of an average rate calculated historically is that the same rate can be applied to all similarly-situated customers and there is no opportunity for error in calculating the rate as it would be defined, presumably by the Authority on a periodic basis. The drawback is that it may not reflect a customer's actual electricity costs, especially if the customer uses a third-party supplier or if actual rates change and the average rate does not, e.g. when rates change annually on July 1.

While a customer-specific calculation could more accurately reflect a customer's actual electricity costs, this methodology requires review and calculation, sometimes manually, of a customer's electric bills, which provides opportunity for error. In addition, savings calculations can be skewed and compounded over multiple years, especially where a customer is paying more through a third-party supplier than the standard service supply rate. In this scenario, the customer would save on their electricity costs without installing solar, and those savings should not be included in their savings estimates tied to the installation of a solar system.

In addition to these two overarching methodologies for standardizing the Average Starting Utility Rate, one must consider whether to calculate an all-in rate or break out various components of the rate, for example utilizing the customer's actual costs for

[16] Proposal 18 sought to add to the CDFs new line items for utility savings and solar costs. Proposal 19 sought to add a checkbox regarding financing (which is not relevant to the Third Party Owner CDF) as well as line items for financial escalation terms, which are arguably beyond the scope of the contractor's knowledge and should be provided by the financing company.

distribution and transmission but applying the standard supply rate to account for any customers who are overpaying because of a contract with a third-party supplier.

One could also reject the historical approach and instead use the prevailing rate at the time of proposal or contract, which would not provide an historical average at all, but would be the most accurate method for calculating current electricity costs.

Whatever method is used to calculate the Average Starting Utility Rate, one must also consider how to account for and calculate non-bypassable and other charges, how to handle discount rates such as LIDR, whether to use one rate for both EDCs and all rate classes or differentiate, and how often to update the rate, e.g. annually or bi-annually on January 1 and July 1 to reflect regular rate changes.

Lastly, there are third-party sources for calculating an average starting utility rate, such as the U.S. Energy Information Administration (EIA) that provides state-level average electricity prices. In addition, many solar software programs aggregate data and provide an historical average rate for the customer's location. For example, at least one CCWG contractor member uses Genability, which is a software platform that provides a comprehensive database of electricity tariffs and a rate engine that can be used to calculate an average all-in electricity rate based on EDC and location.

Ultimately, it seems the most important determination is whether the Authority wishes to focus more on consistency across customers or accuracy specific to each customer, as each of the options is more heavily weighted toward one or the other, but not both.

The methodology provided in Proposal 1 provides the highest level of consistency of any of the methods discussed in the CCWG. It provides that the Average Starting Utility Rate will be the "*all-in retail electricity rate for each EDC as set in the Annual RRES Docket No. 2X-08-02 for the following calendar year*," which for 2026 is $0.31 for Eversource and $0.36 for UI. As the Authority is aware, these calculations are based on significant historical retail electricity rate data provided by the EDCs, "calculated as a weighted average, at a monthly resolution from 2005 through 2025, including the number of customers on each rate during each year and the average supply rate for such customers. . . [and] the total retail rate, as well as the supply and distribution portions of each rate." See Interrogatory CAE-2. The comprehensive data sets provided by the EDCs provide an Average Starting Utility Rate that is consistent and accurate across all ratepayers; however, it is not necessarily accurate as to a specific customer.

The methodology provided as an optional calculation in Proposal 1 provides the highest level of accuracy as to each specific customer who has at least 12 months of usage at the property at which the solar system will be installed: "*the average all-in utility rate over the past twelve months of actual usage based on the customer's utility bills.*" However, as noted above, even though this is historically accurate, it does not necessarily mean projected future savings will be accurate, in particular where a customer is using a third-party supplier.

Because the CCWG could not reach consensus on a methodology for calculating the Average Starting Utility Rate, the better path forward may be to focus on transparency rather than standardized methodology. For example, the Authority could authorize several methodologies for calculating the Average Starting Utility Rate and mandate that contractors transparently describe the method of calculation in writing to customers (presumably on the CDFs) and in their contractor compliance filings.

EOE recommends that the Authority authorize the following methodologies for calculating the Average Starting Utility Rate:

1. Standardized Rates Set in the Authority's Annual RRES Docket

These are the annual rates the Authority calculates based on the information provided by the EDCs in the Annual RRES Dockets. They are per-EDC rates forecast for the following calendar year and are also used as the Netting Tariff Retail Rates ($/kWh). The rates would be set annually in the Final Decision, to take effect on January 1 of the following year and to remain in effect through December 31 of that year.

2. Customer Specific 12-Month Historical Average

Contractors may calculate a customer-specific Average Starting Utility Rate based on the all-in utility rate over the past 12 months of actual usage utilizing the customer's utility bills. If a customer is using a third-party supplier, contractors must explain to the customer how that rate, especially if it is higher than the standard service supply rate, will affect calculations of net savings.

3. Software Calculation Methodology

Contractors may use any accurate methodology utilized by software designed to calculate a reasonably accurate Average Starting Utility Rate for the customer based on their location and usage history.

To ensure transparency given that the methodology itself is not being standardized, EOE recommends the following additional requirements:

a. If a contractor utilizes the Authority's standardized rates (option 1 above), no explanation other than the source of the rate is required. In other words, the contractor must state that the rate is the standardized Average Starting Utility Rate provided by the Authority for the specific EDC for the calendar year and is based on the EDCs' historical retail electricity rate data.

b. If a contractor utilizes either the customer-specific or software methodology (options 2 and 3 above), they must explain in writing to the customer and in their compliance filings the methodology used, including detailing all parameters of the methodology and any parameters that are not included in the methodology. The parameters that must be explained include distribution rate, transmission rate, supply rate, non-bypassable charges, discounts (including LIDR), sources of the information, and a statement of

whether the customer's rate is different than the current standard service rate.

EOE recommends that this information be provided in the proposed new Terms & Definitions section of the CDFs, in the proposed fillable textbox. See Section VI.B.2. above.

Further, EOE recommends that the standardized calculation methodologies for the Average Starting Utility Rate take effect no later than January 1, 2027, and that the Authority set the rate annually in Docket No. 2X-08-02, for the following year starting on January 1 and ending on December 31. EOE also recommends that these standardized calculation methodologies be carried over to the RRES successor program.

I. RECOMMENDATION ON TIMING OF PRESENTING THE CDF TO CUSTOMERS

All CCWG contractors agreed that the CDF should be presented to customers immediately prior to and contemporaneously with the solar contract. While a formal proposal was not presented on the timing of the presentation of the CDF, one can speculate, based on the discussions in the CCWG, that all contractors would have voted accordingly. Of the CCWG members, only OCC (and EOE) advocated for giving customers additional time to review the CDF. Ultimately, the issue comes down to the purpose of the CDF, which, in the words of the CCWG contractors, is to provide transparency and clarity to the customer *at the time of contract signing*.

To the contrary, EOE and OCC believe it would be better for customers to receive the CDF days in advance of contract signing, which would give customers the chance to review thoroughly and formulate questions as well as compare offers from other contractors based on the same information. Unfortunately, it appears to EOE that the earlier presentation of the CDF is not practical.

Given that the CCWG opted to discuss timing of the CDF, as opposed to a new disclosure document, as was also supported by the Authority, CCWG members did not reach consensus on complying with the Authority and EOE's position that the CDF be provided to customers in advance of contract signing. See Final Decision, Dec. 17, 2026, Docket No. 25-08-02, Annual Residential Renewable Energy Solutions Program Review – Year 5, p. 20. Rather, the CCWG contractor members suggested that the most reasonable recommendation at this time would be to require contractors to present to customers fully completed CDFs immediately prior to and contemporaneously with solar contracts. While this will not result in customers receiving the CDF far in advance of contract signing, it will nonetheless be an improvement over current practice. Currently, most contractors have been presenting the CDF to customers *after* contract signing because they have been generating the CDF in PowerClerk with the interconnection application. Requiring the CDF to be presented to customers immediately prior to and contemporaneously with the contract will provide customers with clarity and transparency *at the time of contract*.

Accordingly, EOE leaves the decision regarding the timing of presentation of the CDF to customers to the discretion of the Authority, based on the above analysis and information obtained in the CCWG.

J. Recommendations for Compliance and Proposed Changes to PowerClerk

Following are EOE's recommendations for (1) ensuring contractors comply with requirements to provide certain information in writing to customers and in compliance filings, (2) verifying that the CDF is provided to customers prior to contract signing, and (3) possible changes to PowerClerk.

1. Requirement to Provide Information in Writing to Customers and in Compliance Filings

Regarding ensuring contractors comply with the recommendations and new standards proposed herein, as discussed above in the various recommendations, whenever a contractor is required to provide information in writing to the customer, that information must be provided on the CDF. This includes:

- Calculation of Average Starting Utility Rate based on a customer's past 12 months of actual usage
- Calculation of Average Starting Utility Rate using software
- Use of a Utility Escalation Rate lower than the standardized rate set by the Authority
- Use of a PV Degradation Rate different than the standardized rate set by the Authority
- Use of an Estimated Year One Production (kWh) other than that calculated by PowerClerk
- Calculation of Customer's Annual Electricity Usage

In addition to providing the above information in writing on the CDF to the customer, contractors must include the above information in the compliance filings, in the Financial Benefits Sheet Narrative (Narrative). EOE will audit the CDFs and the Narrative in the annual contractor compliance docket, Docket No. 2X-08-02RE01 to ensure compliance.

2. Requirement to Provide the CDF to Customer Before Contract Signing

In order to ensure contractors are providing the CDF to customers prior to or contemporaneously with their contract, EOE proposes that the following additional language be added to the confirmation by installer representatives on CDFs: "that this form was provided to and reviewed with the customer prior to the customer's signature on any contract for purchase, installation, or financing of the system."

3. CHANGES TO POWERCLERK

Regarding changes to PowerClerk, EOE believes that minimal changes will be needed, and that those changes arise from (1) the proposed changes to the CDFs, and (2) the standardized rates. For the proposed changes to the CDFs that may require changes to PowerClerk, see the redlined CDFS, attached hereto as Attachments C and D. In addition, if the Authority desires and the EDCs are able, the following standardized rates could be included in the PowerClerk application, with the ability to override manually when a contractor is allowed to do so:

- Standardized Average Starting Utility Rate
- Standardized Utility Escalation Rate
- Standardized PV Degradation Rate

During CCWG discussions, the EDCs represented that the changes to PowerClerk likely would be minimal. However, EOE understands that the EDCs may wish to reassess and respond once the recommendations are clearly specified and adopted by the Authority. Therefore, EOE requests the Authority seek information from the EDCs regarding which proposed changes to the CDFs will require changes in PowerClerk.

VII. CONCLUSION

EOE wishes to thank the CCWG members for their time and energy during this process. The meetings were time intensive and on a compressed schedule, yet each member participated respectfully and with good faith together. EOE also appreciates the Authority's consideration of the recommendations stated herein.

Sincerely,

/s/ Thomas Lopez

Thomas Lopez, EOE Director

/s/ Jamie Spannhake

Jamie Spannhake, Staff Attorney

/s/ Brittany Wyman

Brittany Wyman, Staff Attorney

PUBLIC UTILITIES REGULATORY AUTHORITY
Office of Education, Outreach, and Enforcement

Attachments:

-Attachment A, CCWG Meeting Notes

-Attachment B, PowerClerk Estimated Annual Production Calculation

-Attachment C-1, Direct Owner Customer Disclosure Form, redline with proposed changes

-Attachment C-2, Direct Owner Customer Disclosure Form, clean

-Attachment D-1, Third Party Owner Customer Disclosure Form, redline with proposed changes

-Attachment D-2, Third Party Owner Customer Disclosure Form, clean