August 19, 2026

Via Electronic Filing and Service

Jeffrey R. Gaudiosi
Public Utilities Regulatory Authority
10 Franklin Square
New Britain, Connecticut 06051

RE: Docket 26-08-02 Annual Residential Renewable Energy Solutions Review - Year 6 – Written Comments

Dear Mr. Gaudiosi,

Earthlight Technologies, LLC respectfully submits these written comments for filing in Docket 26-08-02. Please contact me with any questions regarding this filing.

Respectfully submitted,

/s/ Sean Riel
Sean Riel
Director of Sales Operations
Earthlight Technologies, LLC
128 West Road
Ellington, CT 06029
T: (413) 544-4292
E: sean@earthlighttech.com

STATE OF CONNECTICUT
PUBLIC UTILITIES REGULATORY AUTHORITY

Residential Renewable Energy Solutions Program	**:**	**Docket No. 26-08-02**
Review – Year 6	**:**	**August 19, 2026**

EARTHLIGHT TECHNOLOGIES, LLC WRITTEN COMMENTS IN RESPONSE TO NOTICE

Earthlight Technologies, LLC ("Earthlight") submits these written comments to the Public Utilities Regulatory Authority ("Authority") in response to the *Notice of Written Comments* issued in this docket on August 4, 2026. We appreciate the opportunity to provide these comments to inform future changes in the Residential Renewable Energy Solutions ("RRES") program.

I. Program Manual Updates

Earthlight makes no comments on this provision.

II. Application Fees

Earthlight's comments regarding application fees contend specifically with the current $25 interconnection application fee adder, as discussed in last year's final decision.[1] We respectfully urge the Authority to extend the definition of Residential Distributed Energy Resources ("Residential DER"), as set forth in 22-06-29, which defines Residential DER as "certified inverter-based systems with a nameplate capacity of 25 kW or less,"[2] to encompass multifamily affordable housing ("MFAH") projects. Since the Authority established the interconnection cost allocation policy and the $25 interconnection application fee adder,[3] a

[1] See Final Decision, 25-08-02 p. 14.
[2] See 22-06-29 Final Decision, p. 4
[3] Ibid., p. 14.

greater number of homeowners have been able to access the benefits of residential solar deployment without being subject to unpredictable costs to be incurred at a later date. MFAH projects greater than 25 kW nameplate capacity have been required to pay this same fee adder; however, such projects have not been afforded the opportunity to benefit from the program that the fee adder supports.

We respectfully submit the following points for the Authority's consideration.

The decision in 26-06-29 establishing the definition of Residential DER was issued on December 20, 2023. The Authority did not formalize a pathway for MFAH participation within the RRES program until July 10, 2024.

The Authority now sets the interconnection application fee adder, originally established in the 22-06-29 decision, within the RRES program docket, thereby making the socialization of transformer upgrade costs an integral component of the RRES program's structure. Because MFAH projects fall within the scope of the RRES program and are required to contribute to this fund, such projects should be permitted to access its associated benefits.

To exclude MFAH projects from the benefits made possible by the fee adder would contravene the fifth Program Objective, which is to "encourage increased inclusivity overall, as well as program participation by low- and moderate-income (LMI) customers and customers in environmental justice communities." Such exclusion would run counter to the Authority's stated commitment to inclusivity and to expanded participation among low-and moderate-income customers and customers residing in environmental justice communities.

III. Multi-Family Affordable Housing Eligibility Requirements

We urge the Authority to reject the Electric Distribution Companies' ("EDCs'") suggestion to introduce additional complexity into the MFAH segment of the RRES program. In

particular, Earthlight asks the Authority to reject the EDCs' central argument that MFAH projects are indistinguishable from Non-Residential Renewable Energy Solutions ("NRES") or Shared Community Energy Facilities ("SCEF") projects.[4] What the EDCs characterize as a large project, whether ground-mounted or roof-mounted, would likely qualify as a small or medium NRES project. Such small projects would never materialize as SCEF projects. Unlike small or medium NRES projects, MFAH RRES projects require the system owner to share a percentage of the Buy-all revenue, either through the distribution of 20% of the revenue amount tenants in an individually-metered configuration, or through the allocation of at least 25% of the net present value of the revenues to qualified building upgrades in a master-metered configuration, As a further distinction from NRES projects, MFAH RRES projects are designed to benefit underserved ratepayers.

Should the Authority elect to lower compensation rates for these project types, such action would directly reduce incentive billing credits afforded to low-income customers, assuming developers and system owners elected to proceed with such systems at all.

Should the Authority require installers to utilize separate points of interconnection for each individual building, as Eversource suggested during the technical meeting,[5] Earthlight fails to understand what problem would be resolved. These solar arrays are already sized to the aggregate load of the tenant meters in accordance with RRES guidelines. Where a system is oversized relative to tenant load, the program manual provides that the EDCs will reject the application. The imposition of multiple points of interconnection would needlessly increase costs

[4] See Eversource Comments, May 8, 2026, pp. 7-8l UI Comments, May 28, 2026, pp. 4-5

[5] See Technical Meeting, 26-08-02, August 18, 2026.

through additional interconnection applications, meters, and other electrical equipment, likely making safe-harbored projects and future projects cost-prohibitive.

IV. Conclusion

Earthlight appreciates the opportunity to provide these written comments to the Authority for the 26-08-02 Annual Review.

Respectfully submitted,
Earthlight Technologies, LLC

/s/ Sean Riel
Sean Riel
Director of Sales Operations
Earthlight Technologies, LLC
128 West Road
Ellington, CT 06029
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E: sean@earthlighttech.com