STATE OF CONNECTICUT
PUBLIC UTILITIES REGULATORY AUTHORITY

ANNUAL RESIDENTIAL RENEWABLE ENERGY SOLUTIONS PROGRAM REVIEW AND RATE SETTING - YEAR 6	: :	DOCKET NO. 26-08-02 MAY 28, 2026

WRITTEN COMMENTS OF THE UNITED ILLUMINATING COMPANY

The United Illuminating Company ("UI" or "Company") provides the following Written Comments in response to the Notice of Request for Written Comments ("Notice"), issued by the Public Utilities Regulatory Authority ("PURA") on May 11, 2026, in the above-captioned docket.

I. BACKGROUND

In 2021, PURA established the Residential Tariff program, now termed the Residential Renewable Energy Solutions ("RRES") Program, in its Interim Decision dated February 10, 2021, in Docket No. 20-07-01, *PURA Implementation of Section 3 of Public Act 19-35, Renewable Energy Tariffs and Procurement Plans* ("Interim Decision"); and instituted an annual review to examine the RRES Program. On March 16, 2026, PURA initiated this Docket No. 26-08-02, *Annual Residential Renewable Energy Solutions Program Review and Rate Setting – Year 6,* to serve as the administrative record of PURA's annual program review and approval of the Year 6 RRES Program rules and other key compliance filings.

To facilitate PURA's evaluation of the RRES Program, it issued the Notice requesting that docket Participants and interested stakeholders file written comments concerning the below issues by Thursday, May 28, 2025.

COMMENTS

1. Rate setting

a. Average upfront installed system cost

The aggregated installed cost data as reported in PowerClerk was used to calculate the annual average costs below.

Table 1: Average installed costs of each program year ($/watt DC).

	2022	2023	2024	2025	2026 Q1
UI	N/A	$3.56	$4.65	$4.30	$4.28

b. *The Investment Tax Credit (ITC) and other federal incentives currently available or planned to be available in 2027*

The ITC is not expected to be available to residential owners of photovoltaic ("PV") systems installed in 2027 or later. It is important to note that the customers should always consult tax professionals regarding these types of investments.

c. *Ongoing operations and maintenance (O&M) costs*

UI does not collect data on estimated or actual O&M costs. However, given the high levels of solar deployment observed, UI does not believe O&M costs are currently a significant barrier to customers installing qualified solar energy systems. UI concurs with the methodology used to estimate O&M costs in the final rate-setting model included in Appendix B of PURA's Interim Decision in Docket No. 21-08-02, dated October 6, 2021.

d. *System performance (e.g., capacity factor) specific to residential solar photovoltaic systems in Connecticut.*

UI calculated the average capacity factor (based on the DC system size) for RRES systems with 12 consecutive months of production data, yielding an average of 11 percent.

Contractor filing requirements

e. *EOE's recommendations for standardized terminology on the customer disclosure forms and other changes to the customer disclosure forms*

At this time, UI has no additional comments beyond those included in the CCWG report.

f. *EOE's recommendations for standardized annual usage calculation, utility escalation rate, PV degradation rate, calculation methodology for estimated year one net savings, and calculation methodology for multi-year net savings*

At this time, UI has no additional comments beyond those included in the CCWG report.

g. *EOE's recommended allowable methods for determining starting utility rate, including whether the choice of starting utility rate should prioritize consistency across customers or accurately reflecting a specific customer utility rate*

UI believes the starting utility rate should be based on the utility rate in effect at the time of project submission and should not rely on third-party supplier rates. Third-party supplier rates may exceed utility rates, artificially inflating customer savings, and may vary widely depending on the customer's contract terms with that supplier.

UI also recommends PURA carefully consider allowable methods for calculating the starting utility rate for customers on the low-income discount rate (LIDR) to help bolster consumer protections for vulnerable customers.

h. *The timing of customer disclosure form presentation to customers and EOE's recommendation that completed forms be provided at the time of solar installation contract signing*

At this time, UI has no additional comments beyond those included in the CCWG report.

i. *EOE's recommended timing for implementing the recommended measures*

UI recommends allowing sufficient time for implementation in PowerClerk and for installers' internal processes, in accordance with PURA's directive. As indicated in CAE-004.

j. *How RRES contractors should be made aware of any adopted requirements*

UI recommends that developers be notified of the updated requirements via an email broadcast of the specific requirements. In addition, UI will notify upon login in PowerClerk with a banner to note changes in requirements, as was previously used for any significant changes. Further, UI will provide significant changes in the annual installer webinar for the annual RRES Program changes.

k. *Whether the Authority should adjust the Residential Tariff Model to utilize average utility escalation rate and PV degradation rate consistent with the recommendations in the CCWG Report (i.e., a 20-year average utility escalation rate and average degradation rate as determined by ISO-NE in its most recent NREL Annual Report)*

   At this time, UI has no additional comments beyond those included in the CCWG report.

l. *Any additional aspects of the report or recommended changes to contractor compliance requirements*

   At this time, UI has no additional comments beyond those included in the CCWG report.

2. Solar production measurement for DC-coupled solar and storage systems

UI does not have any additional comments beyond those in Motion 26, Docket 26-08-02.

3. Additional Comments

In addition to the above-requested comments, UI would like to highlight an additional item for PURA's consideration. The current Multi-Family Affordable Housing (MFAH) eligibility requirements do not include siting or size-to-load requirements that are specific to the MFAH market segment. The RRES Program requires that the eligible solar PV system be located on the eligible property and that the total system size be limited to meet historical usage, or up to 9 kW AC (per unit for MFAH) when historical usage is not available. Additional capacity may be eligible if the customer is pursuing eligible electrification measures. For MFAH properties, the broad

eligibility requirements can allow for a very large, commercial-scale, ground-mounted system to be eligible for the RRES Buy-all incentive rate plus income-eligible adder, totaling $0.3839/kWh. In some cases, the property is large enough that the ground-mounted system's proposed siting requires a new service at an entirely separate interconnection point from the existing building load. Such projects are less costly to construct and may be more similar to a Non-Residential Renewable Energy Solutions (NRES) or Shared Community Energy Facilities (SCEF) project than the typical RRES project. Currently, the only penalty for disallowance from participation in the RRES program is the loss of the $0.055 Income Eligible Adder, bringing the incentive to $0.3289, which is significantly higher than incentives under the NRES program. Therefore, UI recommends that these project types participate under the NRES program.

UI further requests that the Authority consider whether additional siting or adjusted sizing requirements may be necessary to focus RRES MFAH eligibility on solar PV systems located on/at the property they serve.

III. CONCLUSION

UI appreciates this opportunity to provide these comments and look forward to further discussing these issues with PURA and docket participants during the course of this proceeding.

Respectfully submitted,

THE UNITED ILLUMINATING COMPANY

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CERTIFICATION

This is to certify that on this day, May 28, 2026, the foregoing document was filed with the Public Utilities Regulatory Authority, and copies of the foregoing document were served upon each person designated on PURA's official service list in this proceeding in accordance with R.C.S.A. § 16-1-15.

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