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CONNECTICUT GREEN BANK

August 19, 2026

Jeff Gaudiosi, Esquire
Public Utilities Regulatory Authority
10 Franklin Square
New Britain, CT 06051

RE: Docket No. 26-08-02– ANNUAL RESIDENTIAL RENEWABLE ENERGY SOLUTIONS PROGRAM REVIEW – YEAR 6

Response to Request for Written Comments 2

Dear Mr. Gaudiosi,

The Connecticut Green Bank ("Green Bank") respectfully submits comments below into the above referenced docket ("Docket") in response to that certain Notice of Request for Written Comments issued by the Public Utilities Regulatory Authority ("PURA") on August 4th, 2026 (the "Notice"). The section below is organized based on the corresponding sections in the Notice.

> **To facilitate the Authority's evaluation of the RRES Program, the Authority requests that docket participants and interested stakeholders file written comments on or before 4:00 p.m. on Wednesday, August 19, 2026, addressing the following: 1. Program Manual Updates, 2. Application Fees, 3. Multi-Family Affordable Housing Eligibility Requirements**

The Green Bank appreciates the opportunity to provide written comments in the above-mentioned docket and would like to address the following item in its response:

1. <u>Multi-family Affordable Housing Eligibility Requirements</u>

The Green Bank appreciates PURA's consideration of whether changes to Residential Renewable Energy Solutions (RRES) Program eligibility requirements or incentive methodologies are warranted for Multi-Family Affordable Housing (MFAH) projects. The Green Bank acknowledges the concern raised by the Electric Distribution Companies (EDCs) that "large, ground-mounted" MFAH projects may receive incentive levels that exceed those available to similarly sized projects participating in the Non-Residential Renewable Energy Solutions (NRES) or Shared Community Energy Facility (SCEF) programs. However, in evaluating whether program modifications are warranted, it is

important to consider the underlying costs of developing and installing MFAH projects rather than comparing incentive levels alone.

Based on the Green Bank's experience financing and supporting solar projects serving affordable multifamily housing, larger[1] MFAH projects generally exhibit similar installed costs to the broader RRES market. The EDC's presentation at the August 18, 2026 Technical Meeting[2] showed a 2026 Q1 average installed cost of $3.69 per watt for Eversource RRES projects and $4.28 per watt for UI RRES projects. The average installed cost of MFAH projects over 100 kWs from the winning bids of the Green Bank's most recent Request for Proposal for project installation in February of 2026 was $3.64 per watt. This pricing that is comparable to the broader residential market shows that, in the Green Bank's experience, larger MFAH are not generally comparable to NRES projects in price.

These higher costs reflect the unique characteristics of MFAH projects. MFAH projects often involve larger and more complex building configurations, multiple roof sections or electrical systems, tenant benefit allocation requirements, affordable housing financing constraints, and coordination among property owners, housing agencies, lenders, and tenants. As a result, project development, transaction, and installation costs can be significantly higher for MFAH projects than for conventional residential or commercial projects. The fact that some MFAH projects are larger in size does not necessarily translate into commercial-scale economics. For this reason, comparing MFAH incentive levels solely to incentives available under NRES or SCEF may not provide an accurate assessment of whether MFAH incentives are excessive. A higher incentive level may therefore be necessary to achieve comparable project viability and to ensure both tenants and property owners see a meaningful benefit in participation. It is also important to note that the administrative burden associated with MFAH project development is extremely high compared to NRES and SCEF program projects so the economic benefit needs to be persuasive.

The Green Bank is concerned that modifications to MFAH sizing or siting requirements, or the implementation of a reduced Buy-All incentive methodology for MFAH projects, could unintentionally limit solar deployment opportunities at affordable housing properties. Such changes may reduce participation by affordable housing owners and developers and impede the ability of these projects to reduce the electric bills of tenants who are low- and moderate-income Connecticut residents.

Additionally, there could be implications in other Programs, such as, Energy Storage Solutions (ESS) as the Multi-family Affordable Housing projects in ESS are able to use

[1] Large is not defined in the EDC comments. Green Bank is considering projects 100kWs and above for purposes of these comments.

[2] https://www.youtube.com/watch?v=Gp3_fSMJcmw

the RRES definition for MFAH[3]. Changing the siting requirements and/or lowering the size requirements and/or compensation rates for MFAH projects could have an impact on Energy Storage Solutions' equity Objective #4 which is to prioritize delivering increased resilience to: (1) low- to moderate-income (LMI) customers, customers in environmental justice or economically distressed communities, customers coded for medical protection, and public housing authorities as defined in General Statutes § 8-39(b); (2) customers on the grid-edge who consistently experience more and/or longer than average outages during major storms; and (3) critical facilities as defined in General Statutes § 16-243y(a)(2).[4]

The Green Bank values the opportunity presented by PURA to submit Written Comments in RRES Docket No. 26-08-02.

Respectfully submitted,

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[3] https://energystoragect.com/wp-content/uploads/2026/05/Energy-Storage-Solutions-Program-Manual-Revised-for-05-19-2026.pdf

[4] https://www.dpuc.state.ct.us/dockcurr.nsf/4b3c728dd1c0d642852586db0069aa70/b1de90d5e52b43d185258d630056a8bf/$FILE/250805-121725.pdf