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 CONNECTICUT LIGHT AND POWER COMPANY DBA EVERSOURCE ENERGY

The Connecticut Light and Power Company dba Eversource Energy ("Eversource" or the "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, 2026.

COMMENTS

1. Rate setting

a. Average upfront installed system cost

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

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

	2022	2023	2024	2025	2026 Q1
Eversource	$3.86	$3.88	$3.68	$3.71	$3.69

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.

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

Eversource does not collect data on estimated or actual O&M costs. However, based on the high observed levels of solar deployment, Eversource does not believe O&M costs are presently a significant barrier to customers installing qualified solar energy systems. Eversource concurs with the methodology that was used to estimate O&M costs in the final rate setting model included as 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.

Eversource calculated average capacity factor (using DC system size) based on RRES systems with 12 consecutive months of production data, finding an average capacity factor of 11 percent.

2. Contractor Compliance Working Group (CCWG) Report

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

At this time, Eversource does not have any comments additional to what is included in the CCWG report.

b. 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, Eversource does not have any comments additional to what is included in the CCWG report.

c. 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

Eversource believes the starting utility rate should be required to be based on historical utility rates, rather than third-party supplier rates. Third-party supplier rates may exceed utility rates, artificially inflating customer savings, and may be quite variable depending on the customer's contract terms with that supplier.

Eversource 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. Customers on a LIDR should not be provided a savings estimate based on non-LIDR utility rates.

d. *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, Eversource does not have any comments additional to what is included in the CCWG report.

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

Eversource recommends allowing sufficient time for implementation in PowerClerk and installers' internal processes following the directive from PURA in a final decision. The EDCs at times have utilized a transition period for accepting updating disclosure forms of one to two months, during which either version of the form may be accepted.

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

Eversource recommends the EDCs notify applicants of the updated requirements through an email notification, PowerClerk banner, and inclusion in the annual installer webinar on RRES Program changes.

g. *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 Eversource does not have any comments additional to what is included in the CCWG report.

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

At this time, Eversource does not have any comments additional to what is included in the CCWG report.

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

Eversource appreciates UI's attention to the potential implications of certain metering configurations to the operation of the RRES Program and collection of intended revenue through nonbypassable charges. PURA should continue to consider the implications of various system configurations within the design of current and successor clean energy programs, but Eversource does not expect that the current impacts of DC-coupled renewable generation systems that incorporate both solar PV and battery storage and adhere to current RRES Program requirements are significant enough to justify the costs and time required to implement the alternative billing solution proposed by UI.

Eversource believes it is generally acceptable and consistent with Connecticut clean energy goals to meter the combined output of a customer's PV array and DC-coupled ESS. The Company recognizes that the combined operation of these resources will generally result in the recording of less output due to the impact of roundtrip ESS losses, but such losses are fairly negligible and would have commensurate impacts on both credit and nonbypassable charges for customers enrolled in the netting tariff, as well as any incentives. Charging ESS systems from the grid as well as onsite PV generation would result in further modest reductions in the metered net output of the combined system due to additional roundtrip losses, but overall charges to the customer would also increase as additional consumption is recorded by the customer's revenue meter. Parasitic load from the combined operation and of PV and DC-coupled ESS will generally result

in marginal and offsetting impacts that will not materially impact the balance of participant and non-participant costs and benefits of the RRES Program.

Direct consumption of system output during normal operations for purposes other than serving parasitic load would have more significant impacts on the balance of participant and non-participant costs. Consuming energy behind a production meter could significantly reduce both the nonbypassable revenue collected from an RRES customer as well as the volume of renewable energy generation that is reported and sold to offset RRES Program costs. Meanwhile, a customer participating in the netting tariff would still realize the same benefits for reducing load and exporting excess generation through their revenue meter. Fortunately, such operation is already prohibited by existing RRES Program rules and metering requirements. Attachment 12, page 4 of the January 22, 2026 compliance filing to Order No. 23, submitted in Docket No. 25-08-02, includes a wiring diagram with meter placement that will exclusively capture the combined operation of the PV array and ESS system as well as notes that explicitly state: "*Except for the parasitic load utilized to operate the coupled solar and storage system, there shall be no load connected behind the Utility production meter."* Eversource cannot foreclose the possibility that some customers have installed system configurations that do not comply with these RRES Program requirements, but the Company does not recommend implementing costly new billing solutions to serve customers that are not complying with existing program rules.

Eversource also does not expect that it is necessary to meter the output of combined PV and ESS systems during power outages. Current wiring requirements direct customers to bypass utility meters and utilize an automatic transfer switch to supply power to a critical load subpanel when operating during a power outage. Power outage periods represent a very small portion of expected operation of a combined PV and ESS resources, and Eversource has generally not

expected that a customer should be credited or charged for operating a distributed generation facility independent of the electric power system.

The costs and administrative requirements of implementing the new billing solution proposed by UI are likely to exceed the current impacts of combined PV and DC-coupled ESS systems operating in compliance with existing RRES Program rules. As explained in the Company's response to CAE-006 in this proceeding, Eversource is unable to provide a comprehensive estimate of the costs to specifically implement a solution consistent with what UI has proposed at this time, but expects that the estimated cost of implementing a fixed nonbypassable charge based on the nameplate capacity of a customer's PV system would be a reasonable minimum estimate. The Company estimated that the cost to implement "Option 2" in Attachment 2 to its Order No. 18 compliance filing submitted on January 3, 2022, in Docket No. 21-08-02 would be approximately $1.75 million. This amount would equate to over $500,000 in new costs to bill each of the 325 Eversource RRES customers the Company identified in its response to CAE-005 in this proceeding that have paired PV systems with DC-coupled ESS.

Additional Comments

In addition to the above-requested comments, Eversource would like to highlight an additional item for PURA's consideration. The current Multi-Family Affordable Housing (MFAH) eligibility requirements accommodate a growing number of large projects that may have not been fully anticipated at the time the MFAH progam was launch 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) in cases where 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. Providing compensation to large commercial projects in the RRES MFAH program that so greatly exceeds what similar projects would receive through NRES or SCEF may not fully align with the program objective to balance participant and non-participant costs.

Eversource requests PURA consider whether additional siting or adjusted sizing requirements may be necessary to focus the RRES MFAH eligibility to solar PV systems that are located on/at the property they serve, which Eversource believes was the original intent when designing an option for MFAH properties to participate in the RRES Program and receive the RRES incentive rate. If PURA determines any project meeting the current eligibility requirements for MFAH should remain eligible, Eversource recommends PURA consider whether the rate setting methodology used to determine the Buy-all incentive rate should differ between the 1-4 family and MFAH market segments.

III. CONCLUSION

Eversource appreciates this opportunity to provide these comments and looks forward to further discussing these issues with PURA and docket Participants during the course of this proceeding.

Respectfully submitted,

EVERSOURCE

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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.

By: *Daniel Crisp*
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