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October 15th, 2026

Public Utilities Regulatory Authority
Ten Franklin Square
New Britain, Connecticut 06051

Re: Docket No. 26-08-02: *Annual Residential Renewable Energy Solutions Program Review and Rate Setting - Year 6.*

Dear Commissioners,

The Office of Consumer Counsel ("OCC") respectfully submits this letter in lieu of written exceptions in response to the Public Utilities Regulatory Authority's ("Authority") Proposed Final Decision ("PFD"), issued on October 1, 2026, in the above-referenced docket.

OCC takes exception on two issues: application fees and Multi-Family Affordable Housing ("MFAH") eligibility. Additionally, OCC also offers a brief comment on standardizing saving assumptions for consideration in the successor program.[1]

I. APPLICATION FEES

OCC has consistently argued that application fees should cover the cost of processing applications rather than shifting the remainder of the cost to all ratepayers.[2] In Year 4's annual review, OCC noted that the fee had originally been set below cost out of concern that a higher fee would discourage participation and that this concern no longer held because the program had far surpassed its enrollment targets.[3] In Year 5's Review, OCC similarly acknowledged the Authority's upward adjustment to the fee but cautioned that a continued risk of under-collection remained, with a shortfall borne by all ratepayers.[4] In this proceeding, OCC again urged that fees be set to fully recover each EDC's actual administrative costs.[5]

[1] Docket 26-06-04*, Implementation of Clean Energy Successor Programs.*
[2] OCC Written Comments, Docket No. 21-08-02, August 31, 2021.
[3] OCC Written Comments, Docket No. 24-08-02, August 12, 2021, p. 1-2.
[4] OCC Written Exceptions, Docket No. 25-08-02, p.2
[5] OCC Written Comments, Aug. 19, 2026, p.3

The record in this docket shows the same gap. Eversource collected $1,520,126.00 in application fees over the twelve months ending June 30th 2026, and expects to incur $1,760,735 in program costs, a shortfall of roughly $240,600.[6] The United Illuminating Company ("UI") collected $546,149 against estimated administrative costs of $1,001,682, a shortfall of roughly $455,500.[7] The PFD acknowledges that the approved fees "do not fully cover all RRES Program administrative costs" and also notes that no stakeholder argued UI's proposed increase would be a barrier to participation.[8] The remaining costs are recovered from all customers through the EDCs' annual Rate Adjustment Mechanism ("RAM") proceedings.[9] As a result, customers who do not participate in the RRES Program continue to subsidize the cost of processing participants' applications.

In recognizing that 2027 is the final year of the program, OCC does not ask the Authority to revisit the fee levels approved in the PFD. However, OCC maintains its position and requests that the Final Decision replace the statement that the EDCs "may be directed" to justify their RRES administrative costs in the RAM proceedings with a directive that each EDC file, in its 2027 RAM proceeding, a breakdown of the fixed and variable components of those costs. UI should also explain why its total administrative costs did not decline with lower application volumes, a question that PFD itself raises.[10] The Authority should also confirm that recovery of under-collected RRES administrative costs through the RAM remains subject to review for prudence and reasonableness. The Authority should further direct that application fees in the successor residential program being developed in Docket 26-06-04[11] be designed to fully recover administrative costs.

OCC reserves the right to address the recovery of these costs in subsequent EDC RAM proceedings.

II. MFAH ELIGIBILITY

The PFD declines to change the rules on MFAH eligibility, despite OCC's stated concerns that there is risk of overcompensation that may benefit developers over the low-income customers that the program is seeking to benefit.[12]

OCC does not request modification to the MFAH eligibility criteria for the final program year, given that the program is concluding and the resulting 2027 ratepayer impact is expected to be minimal. However, OCC requests that the Final Decision direct the EDCs to track and report for 2027 MFAH applications the number, size, and compensation of projects interconnected at a separate service point from the existing building load. Additionally, the Final Decision should request that the EDCs report how many MFAH projects compensated at RRES rates could otherwise have qualified for the Non-Residential Energy Solutions ("NRES") Program, along with data on each project's size and total compensation. Including such data would show the scope of

[6] Proposed Final Decision, Docket No. 26-08-02, p.9-10
[7] *Id.* p. 10
[8] *Id*.
[9] *Id.* p.11
[10] *Id.* p.10-11
[11] *Implementation of Clean Energy Successor Programs*
[12] PFD, p.30-31, see also OCC Written Comments, Aug. 19, 2026, p.4

the issue before successor program rules are set and allow the parties to assess how often this eligibility gap has been used.

OCC has also consistently maintained that the benefits of solar must reach tenants and support solar access for low-income residents. 13 Accordingly, OCC does not seek any modifications that foreclose participation by such residents. The Implementation of Clean Energy Successor Program review should also examine whether large MFAH projects are in fact delivering these required benefits to low-income tenants. To support this review, OCC further requests that the EDCs' annual tenant-benefit compliance filing under Standing Order No. 10 be provided at the project level breakdown for MFAH projects size for projects interconnected at a separate service point.[14] For each project, the filing should identify the total tariff value paid, the dollar amount distributed to tenants, the number of tenant households served, the average annual benefit per household, and the distribution method. This information will allow the Authority to assess in Docket No. 26-06-04 whether large MFAH projects deliver meaningful benefits to low-income tenants that they would not receive if the projects were compensated under NRES.

The Authority should continue to evaluate and address these issues in Docket No. 26-06-04 to ensure that the successor program's MFAH eligibility criteria strikes the right balance between solar access for low-income customers and cost-containment.

III. STANDARDIZING SAVING ASSUMPTIONS IN THE SUCCESSOR PROGRAM.

OCC remains concerned that a customer can receive two solar proposals with very different savings estimates because the contractors used different assumptions, an issue that was similarly raised throughout the Contractor Compliance Working Group ("CCWG") process and in OCC's comments on the CCWG Report.[15] Additionally, OCC also opposed allowing contractors to depart from the Authority's escalation and degradation rates for the same reason.[16]

While OCC supports the PFD's decision to evaluate contractor compliance requirements for the successor residential program in Docket No. 26-06-04,[17]OCC urges the Authority to make uniform savings assumptions, including the starting utility rate, escalation rate, and degradation rate a priority in that proceeding, so that customers can compare offers on equal terms.

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OCC appreciates the opportunity to submit these Written Exceptions and respectfully requests that the Final Decision direct the EDCs to justify their RRES administrative costs in the 2027 RAM proceedings, require reporting on separately interconnected MFAH projects and carry that issue into Docket No. 26-06-04, and prioritize uniform savings assumptions in the successor program.

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[13] OCC Written Comments, Aug. 12, 2024, Docket No. 24-08-02, p. 1, *see also* OCC Written Comments, Aug. 19, 2026, p. 4

[14] Proposed Final Decision, p.36

[15] OCC cautioned that disclosure of differing methodologies does not let customers meaningfully compare offers; *see* OCC Written Comments, May 28, 2026, p. 4.

[16] *Id*. p.4

[17] PFD, p.15

Respectfully submitted,

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CERTIFICATE OF SERVICE

I do hereby certify that on this day the foregoing document was filed with the Public Utilities Regulatory Authority, and copies thereof were served upon each person designated on the official service list in this proceeding in accordance with R.C.S.A. § 16-1-15.

Dated at New Britain, Connecticut this 15th day of October 2026.

/s/Paschaline Poku
Commissioner of the Superior Court