August 19, 2026

Via Electronic Filing and Service

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

RE: Docket No. 26-08-02, Sunrun Inc. and Goodleap Written Comments in response to Notice for Written Comments

Mr. Gaudiosi,

Sunrun Inc. and Goodleap respectfully submit the attached written comments in response to the Notice of Written Comments issued by the Public Utilities Regulatory Authority on August 4, 2026 in the above referenced proceeding.

Please contact me with any questions regarding this filing.

Respectfully submitted,

/s/ Kyle Wallace
Kyle Wallace
Senior Director, Public Policy
Sunrun Inc.
600 California St, Suite 1800
San Francisco, CA 94108
Phone: (208) 608-6179
Email: kyle.wallace@sunrun.com

STATE OF CONNECTICUT

PUBLIC UTILITIES REGULATORY AUTHORITY

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

WRITTEN COMMENTS OF SUNRUN INC. AND GOODLEAP

I. Introduction and Summary

Sunrun Inc. and Goodleap respectfully submits these brief comments in response to the Notice of Request for Written Comments issued by the Public Utilities Regulatory Authority ("the Authority") in Docket 26-08-02 on August 4, 2026. The Notice requests comments on the Program Manual and other program materials filed by the electric distribution companies ("EDCs"), the proposed application fees, and the eligibility requirements for multi-family affordable housing projects. These comments will briefly address the updates to the program materials. We do not have comments on multi-family affordable housing eligibility and believe that the proposed RRES program fees are reasonable.

II. Customer Owned and Third-Party Owned Disclosure Forms

The disclosure forms that were filed by the EDCs include changes that were recommended in the Contractor Compliance Working Group Report ("CCWG Report"). Sunrun and Goodleap are supportive of most of the changes to the disclosure form including the modified language intended to improve clarity for consumers, the addition of the multi-year net savings checkbox, and inclusion of key terms and definitions. While these changes increase the

length of the disclosure form, they provide important information and do not detract from the overall objective of providing consumers with the key material terms of their solar contract.

While we support the addition of the terms and definitions, we do have some disagreements with the specific language or methodology used for several of the terms. Our position on those inputs and methodologies was discussed extensively in the CCWG Report and our comments filed in this docket on May 28, and we will not repeat those here. The terms and definitions in these disclosure forms will need to be modified based on the Authority's ruling on the CCWG Report recommendations. After the Final Decision is issued, the revised disclosure forms should be filed as compliance. The following comments address items that were not specifically covered in previous filings.

Estimated Year One Production (kWh): This references the EDC PowerClerk production estimate as the default method and treats any contractor-provided production estimate as an alternative method. This framing should be reversed. The production estimate that the contractor provides is what the customer has seen on the system design, is included in the contract and any associated performance or production guarantees, and should be reflected on this disclosure form. The PowerClerk estimate is unrelated to any contractual term and should not be treated as the default method. As noted in prior comments, we do not believe that the disclosure form should be required to be generated within PowerClerk, making this reference to the PowerClerk production estimate unnecessary. The list of variables that impact the production estimate that is provided in the definition clearly explains how a production estimate is determined.

Allowable Alternative Calculations Box: Depending on how many variables are required to be explained in this box, it may require more space on the disclosure form than is provided. Regarding the details that must be provided, we recommend that explanations of the applicable

input or methodology should be provided but that it should not require customer-specific calculations to be provided. For example, an explanation of how customer usage is determined if less than 12 months of historical data is available can be provided, but it should not require the specific calculation or inputs/outputs for that customer to be included. That level of detail in a text box would be very challenging to actually implement and would effectively require manual inputs to the disclosure form.

V. Conclusion

We appreciate the opportunity to provide these written comments and look forward to engaging throughout this annual review process.

Respectfully submitted,

/s/ Kyle Wallace
Kyle Wallace
Senior Director, Public Policy
Sunrun Inc.
Phone: (208) 608-6179
Email: kyle.wallace@sunrun.com

/s/ Jake Assael
Jake Assael
Director of Policy
GoodLeap
Phone: (914) 819-2100
Email: jassael@goodleap.com

CERTIFICATION

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

/s/ Rob Campbell
Rob Campbell
EQ Research, LLC
1155 Kildaire Farm Road, Suite 203
Cary, NC 27511
Phone: (919) 238-4360
Email: rcampbell@eq-research.com

August 19, 2026