October 15, 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 Exceptions to Proposed Decision

Mr. Gaudiosi,

Sunrun Inc. (Sunrun) and GoodLeap respectfully submit the attached written exceptions in response to the Notice of Written Exceptions issued by the Public Utilities Regulatory Authority on October 1, 2026 in the above referenced proceeding.

Please contact me with any questions regarding this filing.

Respectfully submitted,

/s/ Kyle Wallace
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STATE OF CONNECTICUT

PUBLIC UTILITIES REGULATORY AUTHORITY

Annual Residential Renewable Energy Solutions Program Review - Year 6	**:**	**Docket No. 26-08-02**
	:	
	:	**October 15, 2026**

WRITTEN EXCEPTIONS TO PROPOSED FINAL DECISION OF SUNRUN INC. AND GOODLEAP

I. Introduction and Summary

Sunrun Inc. ("Sunrun") and GoodLeap respectfully submits these written exceptions in response to the Notice of Written Exceptions to the Proposed Decision issued by the Public Utilities Regulatory Authority ("the Authority") in Docket 26-08-02 on October 1, 2026. The Proposed Final Decision ("Proposed Decision") makes modifications to the Residential Renewable Energy Solutions Program ("RRES Program") including changes to the non-bypassable charges for Eversource and United Illuminating ("UI"), adoption and modification of recommendations from the Contractor Compliance Working Group Final Report, and declines to make changes for DC-coupled solar+storage systems participating in the program. We appreciate the Authority's consideration of these topics in this proceeding, and provide these limited exceptions regarding elements of the Contractor Compliance Working Group recommendations.

We recommends that the Authority modify the Proposed Decision to:

- Maintain the $.0402/kWh non-bypassable charge for United Illuminating.

- Maintain a 20-year multi-year net savings calculation, or allow for an estimate of customer value beyond year 20.
- Clarify the implementation of the customer disclosure form and allow for a transition period.

II. Written Exceptions

A. ***Non-Bypassable Charge***

The Proposed Decision would increase the non-bypassable charge ("NBC") for UI participants from the current $.0402/kWh to $.0657/kWh for the final RRES Program year, while reducing the NBC for Eversource to $.0325/kWh based on the results of the Residential Tariff Model. The 63% increase in the NBC for UI for 2027 is another significant increase after the large increase for the 2026 program year. The Authority notes that it has historically maintained equivalent NBCs for the EDCs because deployment in UI had lagged behind Eversource and its share of the EDCs' total annual load. In 2025 and the first half of 2026, UI had accounted for 20% of approved applications and therefore can support a higher NBC.[1]

Sunrun and GoodLeap do not have any specific methodological issues with the Residential Tariff Model and the calculation of the $.0657/kWh NBC for UI. However, we are concerned that it is a substantial increase that will consequently push UI back below its proportional share of the market. A $.0657/kWh NBC would equate to a $52/month average charge for UI customers, up from $32/month in 2026. The RRES Program data is clear that a severe market contraction has occurred in 2026 due to the confluence of the loss of the 25D tax credit, lower utility rates, and increased NBCs. While disentangling the specific impact of each factor is impossible, the higher NBC is certainly a factor. UI's ability to exceed the 20%

[1] Proposed Final Decision, pg. 9.

threshold is not because new project applications have been strong, but rather simply because the contraction in Eversource territory has been more pronounced than in UI.

To maintain market stability and avoid further contraction before the transition, Sunrun and Goodleap recommend maintaining the $.0402/kWh NBC for UI, or moderating the increase for the final program year. We believe that this would be reasonable given the market factors at play to ensure that the RRES Program will continue to meet the program objective of a sustained, orderly development of the state's solar industry as the RRES successor program is developed and implemented in 2028.

B. *Multi-Year Net Savings Calculation*

The Proposed Decision would approve the adoption of Proposal 14 regarding multi-year net savings calculations including the requirement that all solar contract or financing costs be included in the calculation even if they occur in years 21+ while savings would only be calculated through year 20.[2] As the Joint Solar Parties previously argued, this unbalanced treatment of costs and savings beyond year 20 is fundamentally flawed and will heavily skew the multi-year savings estimate in a way that is both confusing and misleading for customers. The multi-year net savings figure is a single value provided on the customer disclosure form that incorporates the standardized inputs and assumptions to provide a reasonable estimate of the potential long-term value of the solar system. It is not practical for contractors to be required to include such a figure on the customer disclosure form and then effectively be required to explain to consumers that the figure is wrong because there is customer value beyond year 20 that is not included. Undermining the consumer's confidence in the information provided on the customer disclosure form would run counter to the purpose of the customer disclosure form.

[2] Proposed Final Decision, pg. 18.

The requirement to include costs but not value for beyond year 20 will heavily skew the multi-year net savings figure. One major reason for this is that it is capturing both the utility bill savings and solar costs at the end of a contract term when both of those values are expected to increase over the term of the contract. That makes the inclusion or exclusion of each individual year at the end of the term more impactful from a nominal dollars perspective. Even for solar products that have no escalator such as a loan or zero-escalator PPA or lease, those flat costs are still included while the higher utility bill savings in future years are excluded. The following example illustrates how impactful this requirement would be in practice:

Multi-Year Net Savings Assumptions

Starting Utility Rate: $.24/kWh
Effective Solar Rate: $.18/kWh
Year 1 Net Savings: $575 (25%)
Utility Rate Annual Increase: 2.8%
Solar Rate Increase: 2.5%
Year 1 Production: 9,576 kWh
Solar Contract Term: 25 Years
PV Degradation: .5%

Under the method by which the multi-year net savings figure is provided for the 20-year RRES tariff term, the multi-year net savings would be shown as $15,603. Under the proposed method by which only costs are included for years 21-25, that net savings would be shown as only $2,394. That is a *massive* difference in the multi-year net savings figure based on this requirement. The customer will simultaneously be shown a year 1 savings figure of $575 and a multi-year net savings figure of only $2,394. The estimated year 1 savings figure implies that the customer may save approximately over $2,500 within the first five years, which is higher than what the total multi-year savings estimate shows. This will not make sense to prospective customers and will increase confusion rather than provide clarity.

We urge the Authority to reconsider this requirement and to allow for symmetrical treatment of solar costs and avoided utility costs over the RRES tariff term. As currently proposed, this requirement will effectively make providing a multi-year net savings figure not feasible if the solar contract extends beyond 20 years. If the requirement to include solar costs beyond year 20 is retained, the Authority should also allow for a reasonable estimate of the post-RRES avoided utility costs to be included. This could be estimated by the contractor and disclosed in the alternative methodologies text box on the disclosure form or based on standard assumptions provided by the Authority. We recognize that there is inherent uncertainty to either of those approaches because the post-RRES term compensation has not yet been determined, which is why we prefer using the 20-year RRES tariff term where the compensation structure is known. But if costs are to be included, it is not reasonable to assume that *no utility cost savings* will be provided in year 21 and beyond because that is clearly not accurate and could confuse or dissuade consumers from participating in the RRES Program.

C. ***Revised Disclosure Form Timing***

We are concerned that the effective date of changes to the disclosure form will create significant challenges for contractors to comply, even with good faith efforts. All changes to the customer disclosure form and other contractor compliance requirements have an effective date of January 1, 2027. The EDCs will file the updated customer disclosure forms on December 1, 2026. This provides contractors with one month to incorporate the revised disclosure forms into their processes. This is a very tight timeframe to implement the revised disclosure form, new calculations, and the new information that will be required on the forms, particularly because of the holidays within that one month period. As with prior disclosure form updates, having a sufficient transition period is important to alleviating customer project delays.

In order to facilitate an orderly transition, we recommend:

- Contracts that are signed prior to January 1, 2027 are able to use the 2026 disclosure form even if the RRES submission to the EDC occurs after January 1, 2027. This allows for providing the customer disclosure form contemporaneous with the solar contract and will ensure customers will not need to sign a new disclosure form simply because of RRES submission timing.
- Require the EDCs to utilize a transition period where either disclosure form will be accepted, as has been the case in prior years. This is important given the short time period for contractors to update the disclosure form.

III. Conclusion

Sunrun and GoodLeap appreciate the opportunity to provide these written exceptions to the Proposed Decision.

Respectfully submitted,

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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
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