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August 19th, 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 these written comments in response to the Public Utilities Regulatory Authority's ("Authority") First Notice of Request for Written Comments, issued on August 4, 2026 in the above-captioned docket. These comments address: (1) Program Manual updates; (2) application fees; and (3) Multi-Family Affordable Housing ("MFAH") eligibility requirements.

I. PROGRAM MANUAL UPDATES

OCC generally supports the Program Manual updates filed in Motion No. 7,[1] subject to the concerns noted below. Before the Authority approves the final clean versions of the Program documents, OCC recommends that the EDCs conduct a thorough cleanup and consistency review of the redlined documents. The current redlines contain date, formatting, and terminology errors that should be corrected before the documents are finalized. OCC also recommends that the EDCs clearly differentiate bidding program requirements from guidance materials throughout the Manual and ensure that all referenced documents and forms are easy for contractors and customers to locate. Additionally, the expanded data collection fields in Attachment 9 are useful, but the required fields and their definitions should be standardized before implementation. The final Program Manual and sizing materials should also reflect the Authority's resolution of the MFAH issues addressed in Section III of these comments.

A. Low-Income Adder Notification

The Program Manual should have clear, affirmative language directing income-eligible customers to apply for the low-income adder. Passive availability of the adder is

[1] Joint Motion for Review and Approval of Order No. 1, Docket No. 26-08-02, Annual Residential Renewable Energy Solutions Program Review and Rate Setting - Year 6, August 1, 2026.

insufficient to ensure that eligible customers, particularly those in underserved communities, are aware of and able to access the benefit. Strengthening this language in the Manual could meaningfully improve enrollment in low-income areas, where deployment has historically fallen short of Justice40 goals.[2]

B. Contractor Compliance Requirements

The Program Manual should include a complete summary of all contractor compliance filing obligations, including the marketing and training material requirements established in Order No. 33 of the Year 3 Decision.[3] The current Manual address only Financial Benefits Compliance, which created confusion among contractors regarding the full scope of their annual filing obligations. A clear, consolidated compliance summary in the Manual will reduce that confusion and support more consistent and complete contractor filings.

C. Customer Disclosure Form

OCC supports updating the Customer Disclosure Form ("CDF") to reflect the Year 5 Decision's[4] approved modification to the income-eligible adder eligibility attestation, requiring customers to attest only that they are applying for the low-income program, rather than that they are eligible, consistent with the respective roles of contractors and the EDCs in determining eligibility. OCC further supports incorporating into the CDF any additional updates recommended by the CCWG, consistent with consumer protection objectives directed by the Authority.

D. Metering Diagram

OCC does not have independent technical expertise to evaluate the proposed metering diagrams and guidelines and defers to parties with direct operational knowledge of these requirements. However, OCC takes note of the Authority's denial of the EDCs' metering diagram motion in Year's 5 proceeding due to lack of clarity,[5] and hopes that Year 6's diagram will fully resolve the concerns raised by the industry stakeholders at that time.

II. APPLICATION FEES

OCC has consistently engaged with the application fee question across multiple annual review proceedings. In Year 4, OCC supported an averaged application fee of $210, noting that the program had far exceeded its enrollment targets and that a modest fee increase posed no meaningful barrier to participants.[6] OCC's core concern has been that fees set below actual administrative costs shift the shortfall to all ratepayers, including non-participants through the non-bypassable charge. Similarly, in the program's Year 5 annual review, OCC acknowledged the Authority's upward adjustment to the application fee in the Proposed Final Decision, noting that

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[2] Docket No. 24-08-02, Annual Residential Renewable Energy Solutions Program Review, Year 4.OCC Comments, August 12, 2024, p.1

[3] Final Decision, Docket 25-08-02, Annual Residential Renewable Energy Solutions Program Review and Rate Setting, p. 25, Dec 17, 2025.

[4] Final Decision, Docket 25-08-02-Year 5, p.25-36

[5] Final Decision, Docket No. 25-08-02, p. 26-27, Dec 17, 2025

[6] OCC Comments, Docket No. 24-08-02, p.2, August 12, 2024

even with that adjustment, there remains a continued risk of administrative cost under-collection, which could possibly result in an ultimate shortfall borne by all ratepayers.[7]

Eversource's proposal to retain its current application fee appears reasonably supported on the record and the $22 beneficiary-change fee appears consistent with prior practice. OCC does not oppose these proposals subject to the Authority's verification of the underlying cost justifications.

The United Illuminating Company's ("UI") proposed increase from $200 to $240 warrants additional scrutiny. UI's administrative costs per application are already materially higher than Eversource's, and UI should provide a clearer breakdown of its fixed and variable cost components including a specific explanation of why total administrative costs remain comparable despite a decline in application volume. Without that additional support, the basis for UI's proposed increase is not fully transparent on the record.

More broadly, OCC reiterates its longstanding position that application fees should be set to fully recover each EDC's actual administrative costs without shifting the shortfall to non-participating ratepayers. Any party asserting that a higher application fee would harm program deployment should support that claim with verifiable data. The program's sustained enrollment growth through prior fee increases suggests that the fee level is not a material participation barrier.[8] OCC does not oppose a differential fee structure between Eversource and UI territories, provided each proposed fee is transparently and fully justified by documented administrative costs.

III. MULTI-FAMILY AFFORDABLE HOUSING ELIGIBILITY REQUIREMENTS

The EDCs have identified a growing number of large, ground-mounted MFAH systems receiving residential Buy-All rates and income-eligible adders with compensation levels that exceed what comparable commercial-scale projects would usually receive under the NRES or SCEF Programs. While OCC supports multi-family housing resident access to residential solar programs, this disparity raises legitimate ratepayer cost concerns and warrants the Authority's attention as the program's third objective requires the Authority to balance participant costs and benefits with those of non-participating ratepayers.[9]

A. NOAH Definition

OCC reiterates its support for the updated NOAH definition approved in the Year 5 Decision, which replaced the prior geographic eligibility criterion with a rent-affordability based standard. This change will streamline access to the MFAH pathway for eligible properties and should be fully and accurately reflected in the Year 6 Program Manual.[10]

B. Tenant Benefit Pass-Through

Before adjusting eligibility requirements, OCC urges the Authority to consider the extent to which large ground-mounted MFAH projects are actually delivering solar-bill savings to low-income tenants as required by the program. The income-eligible adder is justified on equity grounds, specifically the expectations that its benefits flow to low-income

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[7] OCC Written Exceptions, Docket No.24-08-02, p.4., September 30, 2024.
[8] OCC Comments, Docket No. 24-08-02, p. 2, Year 4. Aug. 12, 2024, see also Year 5's Final Decision, Docket No. 25-08-02 p. 13-15, Dec. 17, 2025.
[9] Residential Tariff Decision, Docket No. 20-07-01, p.7, February 10, 2021
[10] Year 5 Decision, p.28, December 17, 2025, see Order No.24, p. 35.

residents. In the event that the pass-through is not occurring in practice, the program's structure warrants revision regardless of siting or sizing thresholds. OCC has consistently held that it is crucial for the benefits of solar to be passed down to tenants, not captured at the ownership level.[11]

C. **Rate-Setting Methodology**

OCC encourages the Authority to consider whether the residential Buy-All rate-setting methodology is appropriate for large, commercial-scale ground-mounted MFAH systems and whether an NRES-style methodology would better reflect the cost structure of those projects. OCC does not support changes that effectively foreclose solar access for low-income residents. Any adjustment to the rate-setting methodology should be evaluated carefully to ensure that resulting compensation levels remain sufficient to support solar deployment at affordable housing properties while not overcompensating developers.

D. Sizing and Siting Thresholds

OCC supports the Authority's consideration of sizing or siting thresholds to distinguish residential-scale MFAH systems appropriately compensated under the residential Buy-All rate from larger commercial-scale ground-mounted systems that should be evaluated under a different methodology. Any such threshold should be grounded in documented data from existing MFAH project applications rather than established on a speculative basis.

E. Additional MFAH Issues

OCC also supports MFAH participation in the RRES program, which advances the Program's equity objectives by extending the benefits of residential solar to renters and low-income households.[12] However, compensating large, commercial-scale ground-mounted systems interconnecting separately from the building load they serve at the full Buy-all rate plus income-eligible adder risks overcompensation, given that the rate-setting methodology is premised on average residential installed costs.[13] That excess is funded by non-bypassable charges on all ratepayers, including low-income non-participants with no assurance that it reaches MFAH residents rather than developers' margins. OCC therefore supports adopting siting and sizing requirements that focus MFAH eligibility on systems located on or at the property they serve, rather than categorically excluding such projects from the Program.[14] For any larger projects that remain eligible, the Authority should consider increasing the mandatory tenant benefit share above the 20 percent to reflect such projects' lower installed costs,[15] and should quantify the number, capacity, and incremental ratepayer cost of these projects before setting Year 6 rates. OCC also looks forward to reviewing and considering any other proposed solutions submitted by other stakeholders.

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[11] OCC Comments, Docket No. 24-08-02, p. 2, Year 4. Aug. 12, 2024.
[12] Final Decision, Docket No. 23-08-03-Year 3, p 33-36, Nov 1 2023
[13] Eversource Comments, Docket No. 26-08-02, p.7-8, May 28, 2026, see also UI Comments, Docket No. 26-08-02, p.7-8, May 28, 2026
[14] *Id* Eversouce Comments p.8, UI Comments p.5
[15] Final Decision, Docket No. 23-08-02, July 10, 2024, where Mastered-Metered Affordable Housing required 20% of tariff value to benefit tenants.

OCC thanks the Authority for the opportunity to comment and looks forward to continued participation in this year's annual review.

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 19th day of August, 2026.

/s/Paschaline Poku
Commissioner of the Superior Court