STATE OF CONNECTICUT
PUBLIC UTILITIES REGULATORY AUTHORITY
OFFICE OF EDUCATION, OUTREACH, & ENFORCEMENT

August 19, 2026

Public Utilities Regulatory Authority
10 Franklin Square
New Britain, CT 06051

Re: DOCKET NO. 26-08-02 – ANNUAL RESIDENTIAL RENEWABLE ENERGY SOLUTIONS PROGRAM REVIEW – YEAR 6

Dear Commissioners,

The Office of Education, Outreach, and Enforcement (EOE) respectfully submits these Written Comments to the Public Utilities Regulatory Authority (Authority) in response to the Notice of Request for Written Comments dated August 4, 2026 (Notice) regarding Topic 1, Program Manual Updates.

1. Customer Disclosure Forms (Redlines): Motion No. 7, Attachments 3 and 4

EOE thanks Eversource and UI for including the changes proposed in the Contractor Compliance Working Group (CCWG) Report in their redlines of the Customer Disclosure Forms (CDFs). See CCWG Report, Mar. 31, 2026, Docket No. 26-08-02, Attachments C-1 and D-1. EOE notes the following for the Authority:

- The definition of the term "Estimated Year One Production (kWh)" includes a reference to a document to be attached to/provided with the CDFs to customers: "PowerClerk Estimated Annual Production Calculation" by Clean Power Research, which was filed with the CCWG Report on March 31, 2026, as Attachment B.
- To the extent the Authority does not adopt all the changes proposed in the CCWG Report, the CDFs as proposed in these redlines may need to be altered to match the Authority's directions and conclusions as stated in the forthcoming Final Decision.
- The definition of the term "Utility Escalation Rate," as proposed, includes a percentage that will need to be updated each year, much like the tariff and adder rates.

2. Data Fields to be Collected: Motion No. 7, Attachment 9

The current data field #6 states that the Applicant provides information regarding income-eligible "qualification." However, in order to better align with recent revisions to the CDFs, the data field should refer to income-eligible "application" not "qualification." See EOE Brief, Oct. 22, 2025, Docket No. 25-08-02, Annual RRES Program Review – Year 5, pp. 6 -7. As a result of discussions in Docket No. 25-08-02, the CDFs were revised such that the Applicant is now responsible for stating whether the customer is "applying" for the income-eligible adder, not whether the customer is "eligible" for the adder. Accordingly, EOE suggests that data field #6 on Attachment 9 to Motion No. 7 should be revised as follows: "…confirmation of income-eligible ~~qualification(s)~~ application."

3. RRES Program Manual (Redline): Motion No. 7, Attachment 1

While EOE recognizes this attachment is a redline that may not contain all the functionalities of a final document, EOE nonetheless notes below apparent errors that may need to be corrected and links that may need to be confirmed or updated in order to avoid confusion and ensure consumers and developers have all necessary information. The links listed below did not work for all members of EOE who tried to access them.

- Page 8: Footnotes are numbered 1, then 4, skipping 2 and 3. The reference to footnote 2 exists in the text (regarding NOAHs) but there is no corresponding footnote at the bottom on the page. Presumably, all following footnotes should be renumbered.
- Page 13, footnote 11: The link to information regarding distressed municipalities leads to an error page and not the information noted.
- Page 16, footnote 17: What appears to be an embedded link to UI rates does not contain an actual link. The same link is missing in footnote 21 on page 17, footnote 25 on page 18, footnote 29 on page 19, and footnote 33 on page 20.
- Page 25: The bulleted "Contact Us – UI" link leads to an error page rather than the information stated for some users and does not contain an embedded link for other users.
- Page 36: The bulleted link for the UI Customer Disclosure Forms results in an error and does not lead to the information stated for some users and does not contain an embedded link for other users.
- Page 37 (last paragraph): While it appears there is an embedded link for the "Guideline on Connecticut Residential Solar Tariff Consumer Protection," no link is available.
- Page 39, Income Eligible Adder Eligibility Documentation row: The link for UI's contact information leads to an error page for some users and does not contain an embedded link for other users.
- Page 43: There does not appear to be an embedded link for UI's metering diagrams.

4. Frequently Asked Questions (Redline): Motion No. 7, Attachment 11

Regarding the Frequently Asked Questions, EOE recognizes this attachment is a redline that may not contain all the functionalities of a final document. EOE nonetheless notes below apparent errors that may need to be corrected and links that may need to be confirmed or updated in order to avoid confusion and ensure consumers and developers have all necessary information. The links identified below did not work when EOE attempted to access them.

- Q&A #4: No links are embedded for Eversource or UI application fees.
- Footnotes 3 and 4: Links to Eversource and UI rates are erroneous and do not link to the information noted.
- Q&A #50: No link is embedded for "UI Rates."
- Q&A #59: No link is embedded for the "Distressed Municipality List."
- Q&A #60: No links are embedded for Eversource or UI RRES websites.
- Q&A #64: No links are embedded for the "Eversource I&R Book" or the "UI Guidebook."
- Q&A #67: No links are embedded for Eversource or UI ESS websites.

5. Additional Comments

EOE thanks the Authority for its thoughtful and thorough consideration of EOE's prior recommendations regarding the RRES program requirements as filed in EOE Written Comments, May 9, 2025, Docket No. 25-02-14, Renewable Energy Tariff Program Successor Study;[1] EOE Written Comments, Dec. 12, 2025, Docket No. 25-02-14, Renewable Energy Tariff Program Successor Study;[2] and EOE's Brief, Oct. 22, 2025, Docket No. 25-08-02, Annual RRES Program Review – Year 5.[3] EOE also thanks the Authority for its review and consideration of the CCWG Report, submitted by EOE on behalf of the CCWG in Docket No. 25-08-02, Annual RRES Program Review – Year 5, and Docket No. 26-08-02, Annual RRES Program Review – Year 6.[4]

EOE wishes to thank the Authority for its adoption of many of EOE's prior recommendations in the current RRES program and recommends that these same improvements carry forward into the clean energy successor programs.

[1] Available at 25-02-14 EOE Written Comments.

[2] Available at 25-02-14 EOE Written Comments 4.

[3] Available at EOE Brief for 25-08-02 filed 10/22/2025.

[4] EOE Correspondence with CCWG Final Report, March 31, 2026, Docket No. 26-08-02, available at Docketed Correspondence for 26-08-02 - CCWG Final Report (also filed in Dkt No. 25-08-02).

Lastly, EOE thanks the Authority for the opportunity to comment on these issues.

Sincerely,

PUBLIC UTILITIES REGULATORY AUTHORITY
Office of Education, Outreach, and Enforcement

CERTIFICATE OF SERVICE

I 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.

Sincerely,

By: /s/ Jamie Spannhake

Jamie Spannhake
Staff Attorney
PUBLIC UTILITIES REGULATORY AUTHORITY
Office of Education, Outreach and Enforcement