July 31, 2026

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

Re: Docket No. 26-08-02, PURA Investigation into Distributed Energy Resource Interconnection Cost Allocation, Motion for Review and Approval of Compliance with Order No. 3

Dear Mr. Gaudiosi,

The United Illuminating Company ("UI" or the "Company") submits this motion for review and approval of the Company's proposed application fee adder to the Public Utilities Regulatory Authority ("PURA" or the "Authority") as compliance with Order No. 3 of the Final Decision in Docket No. 22-06-29 (the "DER Interconnection Cost Allocation Decision").

Specifically, Order No. 3 states:

> *No later than August 1, 2024, and annually thereafter, the EDCs shall submit for Authority review and approval in that year's RRES Program annual review proceeding (e.g., Docket No. 24-08-02 for the August 1, 2024 filing) a proposed application fee adder to be charged to interconnection applications received the following calendar year consistent with Section II.D., Policy Design.*

UI has previously recommended maintaining a $25 interconnection application fee adder. See, Docket No. 25-08-02, Motion No. 8, dated August 12, 2025. In approving UI's proposal, the Authority "[agreed] that a further period of evaluation is warranted." See, Docket No. 25-08-02, Final Decision, dated December 17, 2025, at 15.

A $25 interconnection application fee adder has been applied to eligible customer interconnection applications since April 1, 2024. See, Connecticut Distributed Generated Interconnection Working Group Meeting Summary, dated January 30, 2024. Pursuant to Order No. 3 of the DER Interconnection Cost Allocation Decision, UI does not propose any changes to the existing application fee at this time. The Company notes that Order No. 5 of the DER Interconnection Cost Allocation Decision[1] requires the Interconnection Working Group ("IX WG") to assess the effectiveness of the residential DER interconnection cost-allocation policy, including potential refinements to the application fee adder and alternative cost-allocation approaches. The Company therefore believes it is appropriate to maintain the existing fee structure pending completion of that assessment. Furthermore, during the IX WG meeting held on July 17, 2026, participants agreed that the data collected pursuant to Order No. 4 of the DER Interconnection Cost Allocation Decision would provide relevant information to support evaluation of potential modifications to the application fee adder. While this information alone is not determinative, it will help inform the IX WG's assessment under Order No. 5. This recommendation is also consistent with the Authority's December 17, 2025 determination that a further period of evaluation was warranted before modifying the application fee adder.

[1] Order No. 5 requires the IX WG to submit an assessment of the interconnection cost allocation policy for residential DERs

The data presented below is intended to assist the IX WG in evaluating whether an adjustment to the interconnection application fee adder should be considered.

Of the 89 projects that triggered distribution upgrades, 44 projects qualified under Environmental Justice ("EJ") criteria. Of those 44 projects, 14 were energized during the timeframe of July 1, 2025 through June 30, 2026.

- The total revenue requirement from DER-triggered upgrades that were energized from July 1, 2025 through June 30, 2026 was $195,688 with $67,735 attributed to EJ applicants.

- UI collected $41,025 in interconnection application fee adder revenue from July 1, 2025 through June 30, 2026.

- The average monthly impact on residential bill for each customer from triggered distribution upgrades based on energized projects is estimated to be $0.0006 USD.

The data collected to date does not demonstrate a sufficient basis to modify the existing application fee adder. Accordingly, UI recommends maintaining the current $25 interconnection application fee adder while the IX WG continues its assessment under Order No. 5 and evaluates whether any refinements to the current cost-allocation framework are warranted.

I hereby certify service of this filing upon all parties and intervenors of record in this proceeding.

Sincerely,



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