STATE OF CONNECTICUT
PUBLIC UTILITIES REGULATORY AUTHORITY

ANNUAL RESIDENTIAL RENEWABLE ENERGY SOLUTIONS PROGRAM REVIEW AND RATE SETTING - YEAR 6	:	DOCKET NO. 26-08-02 MAY 28, 2026

WRITTEN COMMENTS

Save the Sound respectfully submits the following written comments as part of the Annual Review of the Residential Renewable Energy Solutions Program – Year 6 in response to the Notice of Request for Written Comments issued by the Public Utilities Regulatory Authority (the Authority) on May 11, 2026.

The Authority has requested that docket Participants and interested stakeholders provide written comments on a number of topics, including the following:

1. Information and comments relevant to setting the RRES rates for 2027. Specifically:

b. the Investment Tax Credit (ITC) and other federal incentives currently available and expected to be available in 2027;

Originally set to run through 2034, with the passage of the "One Big Beautiful Bill" the Residential Clean Energy Credit has expired with respect to expenditures on residential solar installations made after December 31, 2025.[1] Accordingly, this credit will not be available to new RRES projects in 2027. We are unaware of any other applicable federal incentives for the installation of residential PV systems.

2. Feedback on the Contractor Compliance Working Group Report. Specifically:

a. EOE's recommendations for standardized terminology on the customer disclosure forms and other changes to the customer disclosure forms;

Save the Sound supports the proposed standardization of terminology to be used on customer disclosure forms and contractor compliance filings. Standardization will help customers understand the value proposition of installing a solar system and allow them to better compare opportunities across vendors. Additionally, standardization should assist in evaluating program performance.

a. EOE's recommendations for standardized annual usage calculation, utility escalation rate, PV degradation rate, calculation methodology for estimated year one net savings, and calculation methodology for multi-year net savings;

[1] One Big Beautiful Bill Act, Pub. L. No. 119-21, § 70506, 139 Stat. 72, 251 (2025), https://www.congress.gov/bill/119th-congress/house-bill/1/text.

Save the Sounds generally supports standardization of the above calculations, as standardization may lessen customer confusion. However, standardization should not come at the expense of accuracy or transparency. For example, with respect to the PV degradation rate, we support EOE's recommendation to utilize the most recent ISO-NE NREL report for establishing the default standardized PV degradation rate while also allowing contractors to use an alternative substantiated degradation rate based on the specific panels being installed.

b. EOE's recommended allowable methods for determining starting utility rate, including whether the choice of starting utility rate should prioritize consistency across customers or accurately reflecting a specific customer's utility rate;

Save the Sound generally supports EOE's recommendation.

Given the variability of third-party supply rates and the opportunity (and tendency) for customers to change suppliers while chasing the lowest short-term rate, we believe that the standardized EDC-specific starting utility rate should be the default. This provides a "home base" for calculating net savings based on the default standard service rates.

That being said, we find no fault in allowing contractors to provide a customer-specific Average Staring Utility Rate, provided that the contractor provides an explanation of how and why the individualized starting rate differs from the Standardized Average Starting Rate. We think this could be particularly helpful for customers that are utilizing the Low-Income Discount Rate, as they are subject to a lower discounted rate on their first 800 kWhs or 1,200 kWhs of consumption (depending on whether they are on standard service or a Time of Use rate) and the default standard service or TOU rate for their remaining consumption.[2] As a result, using the Standardized Starting Rate would tend to over-estimate their expected savings.

In *either* case (i.e., whether using the standardized or an individualized rate calculation), we believe it would be useful for the contractor to inform the customer, both verbally and through the customer disclosure form, how using a third-party electricity supplier could impact the net savings calculation.

c. The timing of customer disclosure form presentation to customers and EOE's recommendation that completed forms be provided at the time of solar installation contract signing

Save the Sound agrees with the perspective voiced by OCC and EOE that customers should be provided with the customer disclosure form (CDF) at least several days prior to the

[2] Docket No. 17-12-03RE11, PURA Investigation into Distribution System Planning of the Electric Distribution Companies – New Rate Designs and Rates Review, Final Decision at 6 (Nov. 20, 2024).

signing of a contract.[3] Providing customers with this form contemporaneously with the signing does not give them adequate time to review and digest the information and formulate questions that may occur to them upon review.

We agree with EOE's recommendation to add additional language to the CDF affirming that it was "provided to and reviewed with the customer prior to the customer's signature on any contract for purchase, installation, or financing of the system." In accordance with our comments above, we would further recommend that this language be amended to affirm that it was provided to the customer "at least XX days" prior to the customer's signature.

Conclusion

Thank you for the opportunity to submit these comments. We look forward to continuing our engagement with the Authority, the EDCs and all of the stakeholders to ensure the continued success of the RRES Program.

Respectfully submitted,

Charles J. Rothenberger
Director of Government Relations, CT
Save the Sound

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CERTIFICATION

This is to certify that on this 28th day of May 2026, a copy of the foregoing document was served upon each person designated on the Authority's official service list in this proceeding in accordance with R.C.S.A. § 16-1-15.

By: */s/* Charles J. Rothenberger

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[3] Docket No. 26-08-02, Annual Residential Renewable Energy Solutions Program Review – Year 6, Contractor Compliance Working Group Report at 48 (Mar. 31, 2026).