October 15, 2026

Via Electronic Filing and Service

Jeffrey R. Gaudiosi
Public Utilities Regulatory Authority
10 Franklin Square
New Britain, Connecticut 06051

RE: Docket 26-08-02 Annual Residential Renewable Energy Solutions Review - Year 6 – Written Exceptions

Dear Mr. Gaudiosi,

Earthlight Technologies, LLC respectfully submits these written exceptions for filing in Docket 26-08-02. Please contact me with any questions regarding this filing.

Respectfully submitted,

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STATE OF CONNECTICUT
PUBLIC UTILITIES REGULATORY AUTHORITY

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

EARTHLIGHT TECHNOLOGIES, LLC WRITTEN EXCEPTIONS IN RESPONSE TO NOTICE

Earthlight Technologies, LLC ("Earthlight") submits these written exceptions to the Public Utilities Regulatory Authority ("Authority") in response to the Proposed Final Decision issued in this docket on October 1, 2026 ("PFD"). Earthlight appreciates the opportunity to provide these exceptions and the Authority's careful work on the final year of the Residential Renewable Energy Solutions ("RRES") Program.

Earthlight supports the Authority's determination to set the 2027 non-bypassable charge ("NBC") for Eversource at the statutory minimum. Earthlight takes exception to three other determinations in the PFD: (1) the decision to decline to extend the residential interconnection cost allocation policy to multifamily affordable housing ("MFAH") projects; (2) the adoption of Proposal 9, without accommodation for incentive adders that the customer receives directly and without limiting its application to Netting tariff systems, as the methodology for Estimated Year One Net Savings; and (3) the treatment of Estimated Multi-Year Net Savings.

I. Transformer Cost Socialization for Multifamily Affordable Housing Projects

Earthlight urges the Authority to reconsider its determination to decline to extend the residential interconnection cost allocation policy to MFAH projects. That policy, established in Docket No. 22-06-29, socializes the cost of distribution transformer upgrades triggered by residential distributed energy resource ("DER") projects, which the Authority defined as certified

inverter-based systems with a nameplate capacity of 25 kW or less. The Authority now sets the associated $25 interconnection application fee adder within this docket, and MFAH projects larger than 25 kW are required to pay that same adder, yet are not permitted to benefit from the policy it funds.

The Authority's own stated objectives point toward extending the policy. The Authority has described its Equitable Modern Grid Framework as designed to achieve four objectives:[1]

(1) support, or remove barriers to, the growth of Connecticut's green economy;

(2) enable a cost-effective, economy-wide transition to a decarbonized future;

(3) enhance customer access to a more resilient, reliable, and secure electricity commodity; and

(4) advance the ongoing energy affordability dialogue in the State, particularly in underserved communities.

The RRES Program Objectives echo these commitments, particularly Objective 4 (program accessibility for customers) and Objective 5 (increased inclusivity, including participation by low- and moderate-income customers and customers in environmental justice communities).[2] Against that backdrop, it is surprising that the Authority would exclude the owners and residents of MFAH communities from benefiting from a cost allocation policy to which MFAH projects contribute when they apply to the RRES Program.

The PFD declines to extend the policy to larger MFAH RRES projects, absent "a detailed evaluation of the cost allocation implications."[3] Three features of the record counsel against a categorical exclusion. First, the cost of the existing policy to non-participating ratepayers is minimal; the Interconnection Working Group reported that recovering transformer upgrade costs adds approximately $0.003 per month to the average Eversource ratepayer's bill and $0.0006 per

[1]Final Decision, 22-06-29 (December 20, 2023), p. 4.
[2]PFD, pp. 3–4.
[3]PFD, p. 12.

month to the average UI ratepayer's bill.[4] Second, MFAH projects are not uniformly large; the Authority itself observed that they range from under 10 kW AC to over 100 kW AC. A categorical exclusion therefore sweeps in smaller MFAH projects that do not present the concern the PFD identifies. Third, MFAH RRES projects must share at least 20 percent of the tariff benefit with tenants and are designed to benefit underserved ratepayers, so exposure to unpredictable upgrade costs works against the purpose for which the MFAH pathway was created.

Earthlight appreciates the Authority's desire to maintain consistency in the final year of the RRES Program. But inaction is not neutral. Without access to the cost allocation policy, MFAH projects remain exposed to project-specific transformer costs from which residential projects are shielded, and that exposure will adversely affect the deployment of systems among underserved communities. Earthlight therefore requests that the Authority extend the residential interconnection cost allocation policy to MFAH RRES projects for the remainder of the RRES Program.

II. Estimated Year One Net Savings

As Earthlight explained in the Contractor Compliance Working Group ("CCWG") meetings regarding Proposal 9, excluding the value of RECs and other incentives from the Estimated Year One Net Savings calculation gives customers a misleading picture of what they can and should expect to save in the first year.[5] Earthlight did not oppose Proposal 9 in its entirety. It opposed only the exclusion of incentive value where the customer receives that value

[4]PFD, pp. 11–12; Office of Education, Outreach, and Enforcement, on behalf of the Interconnection Working Group, Compliance with Order No. 5, Docket No. 22-06-29 (filed in Docket No. 26-08-02 Aug. 19, 2026), p. 2.
[5]Office of Education, Outreach, and Enforcement, *Contractor Compliance Working Group Final Report*, Docket Nos. 25-08-02 and 26-08-02 (Mar. 31, 2026) ("CCWG Final Report"), p. 20; PFD, p. 17.

directly, noting that the Customer Disclosure Form ("CDF") itself identifies the owner of the incentives.[6] Earthlight's alternative, Proposal 11, which would permit contractors to include applicable incentives where the customer receives them directly, received 11 of the 14 votes cast, the same level of support that the CCWG Final Report, as described in the PFD, characterizes as "overwhelming."[7] The PFD does not address Proposal 11.

The objections raised to Proposal 11 are answered by the language Earthlight proposes below. Eversource and UI objected that the phrase "performance-based incentives" could reach storage and other non-RRES incentives, Tesla and others questioned what it means for a customer to receive an incentive "directly," and the Office of Consumer Counsel objected that the term was undefined and introduced optionality.[8] Earthlight's proposal is limited to the two RRES incentive adders, at the values the Authority itself sets; it applies as a rule keyed to the payee designated on the CDF's Key Responsibilities Checklist, not as an option exercised by the contractor. Eversource has stated that it is not opposed to including RRES adders in savings calculations where they are paid directly to the customer of record rather than to a third-party payment beneficiary.[9] That is precisely the line Earthlight proposes. UI recommended excluding adders unless the Authority adopts a specific methodology, observing that adders may not be received by the same party in every project structure.[10] Earthlight's proposal supplies that methodology and accounts for exactly that concern by keying inclusion to the payee.

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[6]CCWG Final Report, p. 20.

[7]CCWG Final Report, pp. 21–22 (Proposal 11 vote: 11 in favor, 3 opposed, no abstentions, 3 absent); *id.*, p. 4; PFD, p. 13 (describing non-consensus proposals receiving at least 11 of 14 votes as having "overwhelming support").

[8]CCWG Final Report, pp. 21–22; OCC Response to Interrogatory CAE-12, Docket No. 26-08-02 (May 28, 2026).

[9]Eversource Interrog. Resp. CAE-12, Docket No. 26-08-02 (May 28, 2026).

[10]UI Interrog. Resp. CAE-12, Docket No. 26-08-02 (May 28, 2026).

The record also confirms that a substantial share of RRES customers receive their adders directly. Eversource reported that, as of May 20, 2026, 49 percent of projects enrolled in the low-income adder and 60 percent of projects enrolled in the distressed municipality adder had the adder payment directed to a third-party beneficiary.[11] The balance (51 percent of low-income adder projects and 40 percent of distressed municipality adder projects) is paid to the customer of record rather than to a third party.[12] For roughly half of Eversource's low-income adder projects, the adder is a real, in-hand benefit that the standardized year-one figure would ignore.

This benefit is not limited to direct-ownership customers. Third-party owners also structure their programs so that the homeowner receives the adder. Palmetto LightReach, for example, requires installers to designate the customer of record as the payment beneficiary on its Connecticut RRES applications, and states that LightReach is not involved in any low- or moderate-income discount the customer receives.[13] Other CCWG members, including Sunrun, Ion Solar, and Trinity Solar, also supported Proposal 11.[14]

The incentive adders were designed to advance the fourth and fifth Program Objectives, and the Authority has repeatedly acted to ensure that customers know about them. In the Year 3 Decision, the Authority found that changes were warranted to ensure customers are adequately informed of the underserved adders and their eligibility requirements, directed the EDCs to amend the CDF to define each adder, state its amount, and identify qualifying programs, ordered that this information be displayed prominently on the form, and concluded that these steps would

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[11]Eversource Interrog. Resp. CAE-7, Docket No. 26-08-02 (May 28, 2026).

[12]*See* Eversource Interrog. Resp. CAE-12.

[13]Palmetto, *Solar Energy Plan: Incentive Deliverables – M1 Milestone* (Connecticut RRES system pre-requisites), Palmetto Installer Guides, https://help.palmetto.finance/en/articles/9083905-solar-energy-plan-incentive-deliverables-m1-milestone

[14]CCWG Final Report, p. 22.

support Program Objectives 4 and 5.[15] The CDF now includes a dedicated Incentive Adder Information section and, within its Key Responsibilities Checklist, an "Ownership of Incentives" line that identifies who receives incentive payments.[16] Yet under Proposal 9 as approved, the form's headline Customer Estimated Year One Net Savings figure would omit the value of the very adders the form identifies as payable to the customer.

The PFD explains that Proposal 9 provides a consistent framework "while excluding REC benefits that may not be provided directly to customers."[17] Where the benefit is provided directly to the customer, that rationale does not apply. The PFD permits contractors to provide an "additional calculation" that adds the value of RECs when the customer will receive it,[18] but it does not say where that figure may appear on the CDF. As drafted, the CDF presents a single Customer Estimated Year One Net Savings line, defined as excluding the value of RECs, with any alternative calculation confined to a text box. A customer who receives an adder directly would thus see an understated headline figure, qualified only by a disclaimer. That also creates an unnecessary inconsistency: a contractor may show the value of the adder in its solar design software only for the standardized form to present a lower figure for the same system. The Authority can readily avoid that confusion, and give customers a clear and transparent picture of the incentives for which they qualify, by modifying Proposal 9 as follows (additions to the language in the PFD shown in bold):[19]

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[15]*Annual Residential Renewable Energy Solutions Program Review – Year 3*, Docket No. 23-08-02, Decision (Nov. 1, 2023) ("Year 3 Decision"), pp. 18–19 & Order No. 22, p. 64.

[16]CCWG Final Report, Att. C-2 (Direct Owner CDF, clean) & Att. D-2 (Third-Party Owner CDF, clean) (Incentive Adder Information; Key Responsibilities Checklist, "Ownership of Incentives").

[17]PFD, p. 17.

[18]PFD, p. 16.

[19]The adder values are the 2027 Netting adder values. PFD, p. 9 & Table 4 (maintaining the current distressed municipality and low-income adder values for 2027).

For projects in which the value of incentive payments is remitted to the Customer, as specified in the Key Responsibilities Checklist:

a. Estimated Year One Net Savings = [Pre-Solar Utility Costs] – [Post-Solar Utility Costs] **+ [RECs]** + [Solar Cost], where
    i. Pre-Solar Utility Costs = [Customer's Annual Electricity Usage] X [Average Starting Utility Rate]
    ii. Post-Solar Utility Costs = ((Customer's Annual Electricity Usage – Estimated Year One Production) X Average Starting Utility Rate) + (Solar Production Charge X Estimated Year One Production)
    iii. **RECs = [Applicable incentive adder] X Estimated Year One Production**
    iv. **Applicable incentive adder =**
        - **For low-income adder: $0.035 per kWh**
        - **For distressed municipality adder: $0.0175 per kWh**
    v. Solar Cost =
        - For Direct Owned without financing: Cost of the system
        - For Direct Owned with financing: Total of payments in Year One
        - For Third-Party Owned: Total of payments in Year One

For projects in which the value of incentive payments is remitted to the primary installer/owner, as specified in the Key Responsibilities Checklist:

a. Estimated Year One Net Savings = [Pre-Solar Utility Costs] – [Post-Solar Utility Costs] + [Solar Cost], where
    i. Pre-Solar Utility Costs = [Customer's Annual Electricity Usage] X [Average Starting Utility Rate]
    ii. Post-Solar Utility Costs = ((Customer's Annual Electricity Usage – Estimated Year One Production) X Average Starting Utility Rate) + (Solar Production Charge X Estimated Year One Production)
    iii. Solar Cost =
        - For Direct Owned without financing: Cost of the system
        - For Direct Owned with financing: Total of payments in Year One
        - For Third-Party Owned: Total of payments in Year One

In the second scenario, contractors would continue to inform customers that the calculation does not include the value of RECs, as the PFD requires. In the alternative, Earthlight

asks the Authority to clarify that the additional calculation described in the PFD may appear on the CDF itself, adjacent to and with equal prominence as the standardized Estimated Year One Net Savings figure, rather than only in the Allowable Alternative Calculations text box.

Application to Netting Tariff Systems Only

Earthlight asks the Authority to state expressly that the standardized Estimated Year One Net Savings methodology, and the Estimated Multi-Year Net Savings methodology discussed below, apply only to systems enrolled in the Netting tariff. The methodology compares the customer's utility costs before and after solar with the cost of the system. For a Buy-All system, the customer's financial benefit is the compensation paid for production, together with any incentive adder, and the methodology does not model that compensation. Without it, the calculation would capture only costs and would show a Buy-All customer a net loss that does not reflect the economics of the system. Buy-All systems were not modeled in the CCWG meetings, and the CCWG did not develop or vote on a Buy-All methodology.[20] Earthlight requests that the Authority limit the standardized calculations to Netting tariff systems and direct that any methodology for Buy-All systems be developed with stakeholder input, including in the successor program proceeding.[21]

III. Estimated Multi-Year Net Savings

Earthlight reiterates that Estimated Multi-Year Net Savings should reflect the value of any incentive payments that the homeowner directly receives. Earthlight's Proposals 12 and 13 added to EOE's multi-year methodology a step that includes the value of applicable incentives

[20]*See* CCWG Final Report, pp. 19–26 (Proposals 9 through 14); the Report does not discuss Buy-All systems. *See also* PFD, p. 16 (formula includes a Solar Production Charge and a utility-rate comparison).

[21]See PFD, p. 17 (noting that successor program rules, including any contractor compliance requirements, will be established in Docket No. 26-06-04).

the customer is eligible to receive directly, reduced each year by the PV Degradation Rate. Each received 11 of the 14 votes cast, and members including Sunrun, Trinity Solar, Ion Solar, SAVKAT, and the Connecticut Green Bank stated a preference for including incentives in multi-year calculations.[22] The PFD adopts Proposal 14 without discussing Proposals 12 or 13.[23] Earthlight respectfully requests that the Authority apply to the multi-year calculation the same payee-based rule proposed above, so that, for projects in which incentive payments are remitted to the Customer, Estimated Multi-Year Net Savings include the annual value of the applicable incentive adder, reduced each year by the PV Degradation Rate.

Earthlight also asks the Authority to clarify how contractors "would still be permitted to explain to customers" that RRES systems provide value after the 20-year term when the Authority has not determined what that value will be.[24] The PFD approves a requirement that any multi-year net savings estimate include the full cost of the customer's financial product, including payments that fall due after year 20,[25] while acknowledging that the post-term tariff contemplated by General Statutes § 16-244z(c)(1)(E) has not yet been established and that the post-term value of the system is therefore uncertain.[26] Requiring contractors to disclose costs beyond year 20 while the corresponding benefit remains, by the Authority's own account, undetermined presents an incomplete view of the solar generation benefit to the homeowner. The Joint Solar Parties raised this concern,[27] and EOE acknowledged that the added requirement "was not voted on in the CCWG."[28]

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[22]CCWG Final Report, pp. 24–26.
[23]PFD, pp. 17–18.
[24]PFD, p. 18.
[25]PFD, pp. 17–18.
[26]PFD, p. 18; Conn. Gen. Stat. § 16-244z(c)(1)(E).
[27]Joint Solar Parties Comments, p. 7; *see* PFD, pp. 17–18.
[28]PFD, p. 17.

Before contractors are compelled to present costs beyond year 20 in a 20-year net savings estimate, the Authority should first establish the tariff value for energy produced after year 20, as the statute directs. Accordingly, Earthlight respectfully requests that the Authority establish the post-term tariff under § 16-244z(c)(1)(E) before requiring contractors to include post-year-20 financing costs in a 20-year net savings estimate.

IV. Conclusion

Earthlight appreciates the opportunity to provide these written comments to the Authority for the 26-08-02 Annual Review.

Respectfully submitted,
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