CAE-001 Q:

UI Interrog. Resp. CAE-30, Docket No. 25-08-02; UI Compliance, March 17, Docket No. 25-08-02, Att. 1. In its response to CAE-30, UI stated that the reported number of projects receiving adders are a subset of the number reported that are eligible for adders. However, in the data reported for 2025, the number of projects receiving the low-income adders is higher than the number of projects eligible for the low-income adder. Explain and provide corrected data if necessary.

CAE-001 A:

UI understands the referenced variance to compare two different data points: (1) projects where low-income adder eligibility was indicated through developer/applicant/customer-submitted application information, and (2) projects that ultimately received the low-income adder after UI's administrative review under the RRES Program rules. The latter may exceed the former without indicating that an ineligible customer received the adder.

The RRES Program is administered by the EDCs, including UI. The developer/applicant submits application materials through the RRES application process, including Customer Disclosure Form information that asks whether the customer is applying for the income-eligible adder, and Payment Beneficiary information where applicable. Accordingly, the developer/applicant-entered adder field is an application indicator, not the final measure of UI-confirmed adder receipt.[1]

[1] See PURA, Residential Renewable Energy Solutions Program webpage, Program Overview; United Illuminating, Residential Renewable Energy Solutions Direct Ownership Customer Disclosure Form, Customer of Record Income Eligible Adder Information; Residential Renewable Energy Solutions Program Manual, Version 2026.1, pp. 11, 42, 46.

The Program Manual provides that where an adder was not applied for, and the Customer of Record is the Payment Beneficiary, the EDCs will automatically apply the relevant adder when the EDC confirms eligibility and will apply the higher adder if the customer qualifies for both the income-eligible and economically distressed municipality adders. For the income-eligible adder, the Program Manual identifies UI hardship programs, including the Low-Income Discount Rate, as acceptable evidence of eligibility and states that no additional documentation is required for customers participating in the identified EDC hardship programs.[2]

Therefore, some 2025 projects may not have been initially marked by the developer/applicant as income-eligible in PowerClerk but were later confirmed by UI through its customer eligibility review and received the low-income adder. UI's process is customer-protective, consistent with the Program Manual, and supports PURA's RRES objectives for increased participation by low- and moderate-income customers and environmental justice communities.[3]

UI has completed its internal review and has determined that no data corrections are necessary. However, in conference with Eversource and understanding that they report the data post internal review, UI will shift its reporting methodology to provide the data post internal review

[2] Residential Renewable Energy Solutions Program Manual, Version 2026.1, pp. 12, 20, 22.

[3] See PURA, Residential Renewable Energy Solutions Program webpage, Program Overview and Recent Changes; Residential Renewable Energy Solutions Program Manual, Version 2026.1, pp. 12, 20-22.

in future reports. This will more closely align EDC reporting of adders by not including developer / applicant inputs of adder eligibility, which should assist in avoiding confusion moving forward.