May 28, 2026

Via Electronic Filing and Service

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

RE: Docket No. 26-08-02, Sunrun Inc., Tesla, GoodLeap, IGS, Connecticut Solar & Storage Association, and Earthlight Technologies Written Comments in response to Notice for Written Comments

Mr. Gaudiosi,

Sunrun Inc, Tesla, IGS, Connecticut Solar & Storage Association, GoodLeap, and Earthlight Technologies respectfully submit the attached written comments in response to the Notice of Written Comments issued by the Public Utilities Regulatory Authority on May 11, 2026 in the above referenced proceeding.

Please contact me with any questions regarding this filing.

Respectfully submitted,

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STATE OF CONNECTICUT

PUBLIC UTILITIES REGULATORY AUTHORITY

Annual Residential Renewable Energy Solutions Program Review - Year 6	**:**	**Docket No. 26-08-02**
	:	
	:	**May 28, 2026**

WRITTEN COMMENTS OF SUNRUN INC., TESLA, GOODLEAP, IGS, CONNECTICUT SOLAR & STORAGE ASSOCIATION, AND EARTHLIGHT TECHNOLOGIES

I. Introduction and Summary

Sunrun Inc. ("Sunrun"), Tesla, GoodLeap, IGS, Connecticut Solar & Storage Association, and Earthlight Technologies (collectively the "Undersigned Entities") respectfully submit these comments in response to the Notice of Request for Written Comments issued by the Public Utilities Regulatory Authority ("the Authority") in Docket 26-08-02 on May 11, 2026. The Notice requests comments on three topics: rate setting, the Contractor Compliance Working Group Report, and on United Illuminating's ("UI") Motion for Clarification regarding solar production measurement for DC-coupled solar and storage systems. The Undersigned Entities will provide comments on all three topics.

II. Rate Setting

The 2027 program year will be the final full year of the Residential Renewable Energy Solutions Program ("RRES Program") and accordingly the Authority should limit significant structural changes while prioritizing and ensuring continuity as all stakeholders prepare for the forthcoming RRES successor proceeding launching this August. The 2026 program year is being

impacted by several key factors which will flow through into deployment figures and will be applicable for the 2027 program year as well.

The residential solar sector continues to face a challenging market environment. As of January 1, 2026, the 25D Residential Clean Energy Credit is no longer available. This created a small surge in applications in the second half of 2025 (primarily Q3) as homeowners sought to install their systems before the end of the year, and an expectation for 2026 of market contraction. While the section 48E Clean Electricity Investment Credit remains available through 2027, there remains uncertainty regarding the Foreign Entity of Concern ("FEOC") requirements that a project must meet in order to be eligible for the tax credit. The Department of the Treasury issued guidance in February that clarified certain issues regarding the Material Assistance Cost Ratio and the various compliance pathways, but did not provide clarity regarding important elements of the "Foreign-Influenced Entity" determination. This has perpetuated uncertainty as investors and manufacturers are unclear on their eligibility to capture tax credits, tightening financing and available equipment. The necessity of FEOC compliance for tax credit purposes has also had an impact on FEOC-compliant equipment prices from the few manufacturers with tax credit certainty. Also on the federal policy front, the Trump administration continues to use a broad set of tools to add precariousness and costs into the solar supply chain. Trade policies like Anti-Dumping / Countervailing Duties, the ongoing spectre of broad based tariffs, and more targeted approaches like the use of Section 232 to investigate polysilicon or aggressive supply chain audits under the Uyghur Forced Labor Prevention Act, have had a cumulative effect of driving up the price of various components of a solar system, creating headwinds for project deployment.[1]

[1] For example, see https://pv-magazine-usa.com/2026/04/03/u-s-solar-module-prices-face-upward-pressure-as-trade-risks-and-feoc-rules-dominate-q1-2026/.

The increase in the non-bypassable charge ("NBC") to $.0402/kWh for 2026 represented a significant increase to the $.005/kWh NBC that was in place for RRES projects in 2025. This substantial increase in the NBC has come at a time when utility rates in Connecticut have decreased multiple times over the past year and a half, most notably the major decrease to the NBFMCC and System Benefits Charge that took effect on May 1, 2026. Rates will decrease further on July 1 when the new supply rates go into effect. New RRES participants will receive the lowest level of compensation since the start of the RRES Program in 2022. The chart below displays the RRES Netting Tariff value for participants based on average utility rates from prior program years and incorporating the REC adder or NBC as applicable.[2]

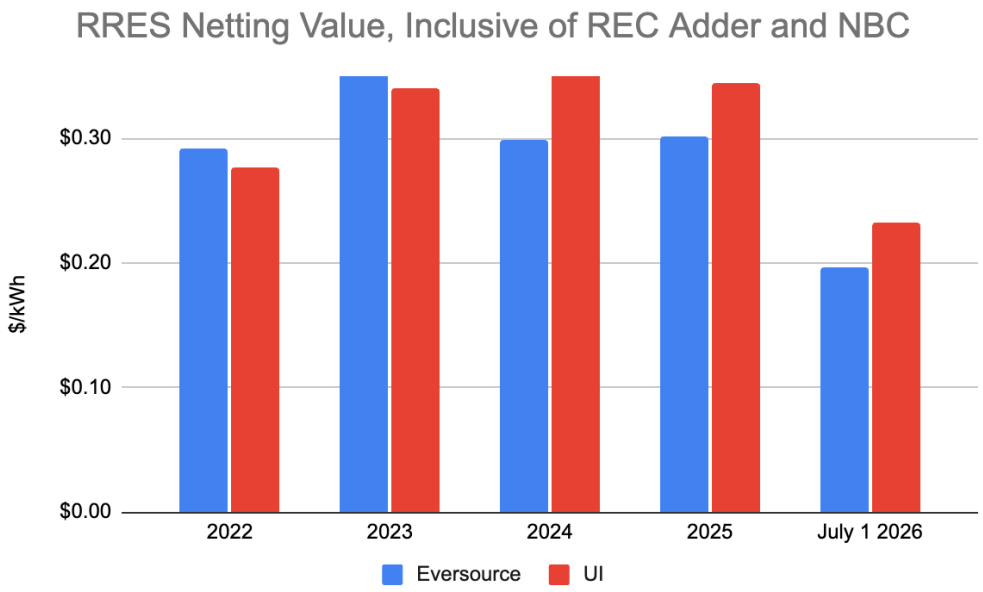

Figure 1: RRES Netting Value, Inclusive of REC Adder and NBC

Unsurprisingly, the reduced compensation levels coupled with the loss of the 25D tax credit, and increased equipment costs and uncertainty has resulted in Q1 2026 RRES applications

[2] Average utility rates for 2022-2025 were pulled from the Residential Tariff Model used in the 25-08-02 Final Decision. The July 1, 2026 utility rate is based on current rates and the expected supply rate reduction that will take effect on July 1. The REC adder was included for Eversource in 2022 and 2023 and the NBC was applied to both utilities in 2025 and 2026.

falling to *nearly half* of what the RRES Program has seen during Q1 in prior years.[3] This is a smaller number of applications than even in Q1 2022 when the RRES program had just launched (and therefore had experienced some demand pull-forward in 2021 as customers sought eligibility for net metering) and the new RRES interconnection process was experiencing major challenges which took several months to resolve. While Q1 is typically the quarter with the fewest number of applications in a year, the precipitous drop is unique but parallels the national trend. WoodMackenzie, in an April 2026 report, anticipates a 19% drop in the U.S. residential solar market for 2026.[4] Still, even this forecast may be conservative as it expects TPO project eligibility for the ITC and bonus adders to cushion the sector, when as we laid out above, access to the ITC is being complicated by the lack of FEOC guidance by the Treasury Department. The Authority should take into consideration the levels of new applications and deployment as we get additional data for Q2 and Q3. Based on the current market conditions, achieving the program objective of maintaining "the sustained, orderly development of the state's solar industry" will be more challenging for 2026 and 2027 than in prior years.

[3] RRES application data pulled from Eversource Compliance Filing - Order No. 11 in Docket 25-08-02 (April 15, 2026) and UI Compliance Filing - Order No. 11 in Docket 26-08-02 (May 1, 2026).
[4] Wood Mackenzie US residential solar finance update H1 2026

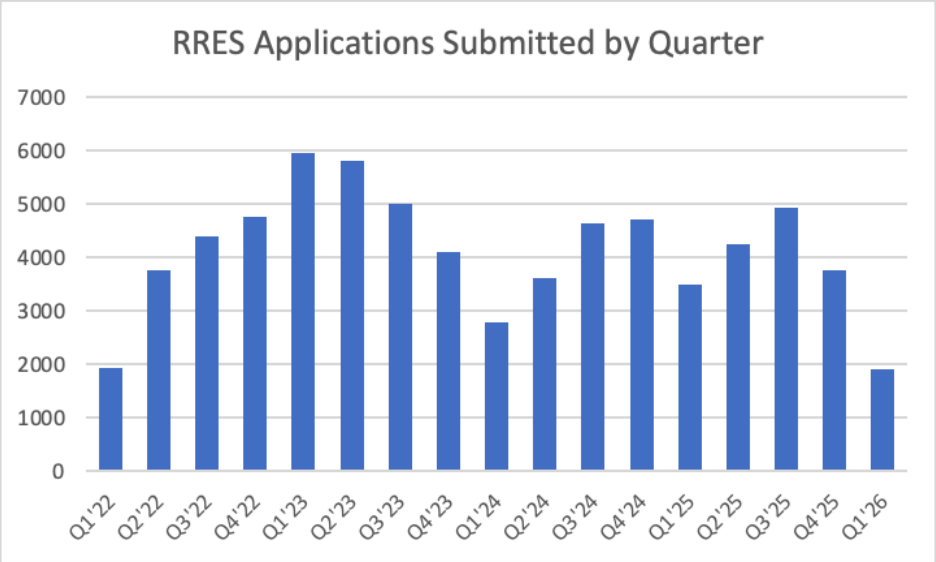

Figure 2: RRES Applications Submitted by Quarter

The Year 5 Final Decision used a forecasted utility rate of $.313573/kWh for Eversource and $.358249/kWh for UI which resulted in the $.0402/kWh NBC. Beginning on July 1, 2026, Eversource's rate will be approximately $.236/kWh and UI's $.266/kWh. These utility rates are substantially below what was modeled and, if incorporated into the Residential Tariff Model, would have resulted in the model recommending a REC adder rather than a NBC. The Undersigned Entities believe that an NBC of $.0325/kWh, as required by Public Act 25-173, would be appropriate for 2027.

The Undersigned Entities are concerned that further increasing the NBC for 2027 would impact RRES program participant satisfaction due to the size of the NBC. A customer whose system produces 800 kWh in a month on average is seeing a $32.16/month solar charge on their bill. This is substantially more visible and impactful to their total bill than the $4 charge for that same system production in 2025. As explained by Eversource in Docket 25-08-02, it may be confusing to consumers to be simultaneously credited and charged for the same production.[5] We

[5] See Eversource Written Exceptions, Docket No. 25-08-02, December 9, 2025.

share the same concern and do expect more customer questions regarding the NBC on customer utility bills as the year progresses and more 2026 systems are placed in service.

III. Contractor Compliance Working Group Report

As an initial matter, the Undersigned Entities note that the comments throughout the Contractor Compliance Working Group ("CCWG") Report regarding the many proposals and topics generally reflect the applicable company's perspective. While the Undersigned Entities would point to the CCWG Report on specific proposals and topics, we will address several higher level considerations regarding the report. As explained further below, the Authority should be conscientious about when to implement whichever suggestions the Authority ultimately adopts from the CCWG Report. EOE's suggestions targeting a July 1, 2026, deadline for some changes would not be feasible given the regulatory cadence, and incorporating some of these suggestions should be considered for the 2027 program year or in the successor program depending on the scope and complexity of the change. If the Authority does wish to incorporate recommendations into the final year of the RRES, we ask that an appropriate amount of time be given to the market to adjust their business operations. The Undersigned Entities recommend that 90-days be provided from the time of a final order, with potentially a longer time frame depending on the complexity of the new requirements.

a. Standardized Terminology and Customer Disclosure Form Changes

The Undersigned Entities are supportive of the standardized terminology recommended in the CCWG Report. The Undersigned Entities also support the CCWG Report recommendations to adopt Proposals 16, 17, 21, and 22. Regarding Proposal 19, the CCWG Report reflects Tesla's concern with this proposal.

b. Standardized Inputs & Assumptions

The Undersigned Entities are generally supportive of the recommendations for proposals 3, 4 &5, 7, and 9.[6] As discussed below, it will be critical that appropriate time–at least 90 days–is provided between when an order or decision is issued regarding these changes and when the changes go into effect. Some of the recommendations may require changes to internal data systems and calculations, processes, and customer-facing documentation that will take time to update to be in compliance. Rushing compliance could lead to mistakes and unintended harm for consumers. Allowing contractors who are already contending with a precarious market the grace to make the necessary compliance updates will allow for more confident and trustworthy consumer experiences.

Regarding proposals 14 & 15 on Estimated Multi-Year Net Savings, the Undersigned Entities have slightly different perspectives that are reflected in the CCWG Report. EOE recommends an addition to Proposal 14 that was not voted on regarding the inclusion of any costs that may occur outside of the 20-year RRES term in the multi-year net savings calculation. The Undersigned Entities do not support this addition. Section 16-244z requires the Authority to establish a tariff for compensating RRES customers at the expiration of their 20-year term. As such, these customers' systems will continue to provide value. However, EOE's addition would only incorporate the costs, and not the value provided, after the 20 years which will necessarily skew the multi-year net savings estimate.

c. Starting Utility Rate

The Undersigned Entities agree with the CCWG Report that trying to standardize the starting utility rate was the most challenging topic, and we appreciate the input and perspectives of all members of the CCWG. Simply put, no method for determining a starting utility rate is

[6] Sunrun,Tesla, and GoodLeap all preferred Proposal 5 rather than Proposals 4.1 and 4.2.

perfect and there are multiple defensible approaches that all have their own benefits and drawbacks. There is certainly a tension between consistency across customers and customer-specific accuracy.

For example, Proposal 1 which would simply require use of the utility rates set by the Authority in the annual RRES docket is straightforward and from a practical perspective is easier to comply with because it is a single number for each utility that is updated once a year. However, if this proposal had been in effect for 2026, customers in July would be seeing $.31/kWh for Eversource on the customer disclosure form and other proposal materials despite the utility rate being under $.24/kWh (before taking into account the NBC). This is a substantial difference, and Sunrun expressed discomfort about this very situation during a CCWG meeting. Because utility rates change multiple times per year, any set utility rate will necessarily be "wrong" at some point during the year. A rigid methodology that cannot account for these inevitable swings, in either direction, is a risk for program participants and contractors. At the end of the day, it is the contractors who have to show, explain, and defend any savings estimates and their associated inputs and methodology to prospective customers. If the required starting utility rate differs too much from the reality that the prospective customer sees on their utility bills, that puts the contractors in a challenging spot, and the answer of "we are required to use this utility rate" may not be satisfactory for the customer.

On the other hand, using the current utility rate from recent utility bills is "accurate" in that the customer is readily able to confirm the rate. However, a methodology that only incorporates the current rate may not properly account for the supply rate differential based on the time of year, changes to the RAM charges, or other rate changes. Other methodologies may include using the current charges for certain rate components while using a longer-term average

for others (namely the supply rate). Each of these methodologies has their own merit and are defensible, and none are definitively "wrong." It is important to acknowledge this inherent complexity and that any utility rate that is used will never be "perfect" for every situation.

As such, the Undersigned Entities agree with EOE that transparency regarding the starting utility rate is the best approach. We agree that the addition of a fillable text box where the source and methodology of the starting utility rate can be provided to customers would be appropriate. We do not believe that the Authority should authorize a set of approved methodologies as recommended by EOE, particularly because authorized methodologies would already be fairly wide-ranging and allow for a range of calculations. While some contractors participated in the CCWG, any new requirements regarding inputs and assumptions would apply to dozens of other contractors who were not involved and it would not necessarily be fair to preclude them from using what may be equally valid methodologies.

Regarding what is required to be provided in the fillable text box versus what is required in a contractor's annual compliance filing, the key difference will be what is useful and actionable information for the customer. We are concerned that EOE's proposed language for what is provided in the text box may be too complicated for customers to understand and appears to potentially require customer-specific disclosures regarding items such as the supply rate which would be very challenging to actually operationalize. What is useful for the consumer is understanding what the starting utility rate is intended to reflect. Is it a historical average over a period of time? Is it based on what the current utility rate is? Does it account for a third-party supplier rate? Requiring information in the explanation that an average customer will not understand will likely lead to confusion, and not clarity. The more detailed information regarding

how a starting utility rate is calculated is more appropriately reflected in the annual compliance filing like it is today.

d. Timing of the Customer Disclosure Form

The Undersigned Entities supported ensuring that the customer disclosure form is provided to consumers contemporaneously with the solar contract. This aligns with best practices from other jurisdictions and provides the customer with the disclosure form alongside the longer solar contract so that they can more easily identify the key material terms of the contract and compare against other proposals they may have received. The CCWG Report notes that EOE and OCC believe that the customer disclosure form should be provided in advance, potentially several days in advance, to the customer signing the solar contract. The Undersigned Entities contend that providing the customer with the contract and the customer disclosure form at the same time *does not* prevent the customer from taking time to review the disclosure form, solar contract, ask questions, or seek out additional quotes. Not all contracts are signed immediately after being provided by the contractor.

However, it is critical that the contract and disclosure form be provided together because the information must match and if they are generated separately and provided at different times it increases the chance of inconsistency of information. The contract must be generated to have proper information on the customer disclosure form, and it would be unwise to force customers to sit with incomplete information (just the customer disclosure form, when there is a significant amount of pertinent information in the contract itself) for a regulated period of time before receiving the rest of the already-generated package that is necessary for them to make an informed decision.

Under Connecticut law, consumers have a minimum three day cancellation period for any home improvement contract. Many solar companies offer consumers the ability to cancel their solar contract well after the three day period, including up until the date that the installation has begun at the home. This provides significantly more time for consumers and negates the need to provide the disclosure form several days in advance of the solar contract.

e. Implementing New Requirements

EOE recommends in the CCWG Report that the customer disclosure form changes go into effect no later than July 1, 2026 and that the requirements regarding standardized inputs, assumptions, and methodologies go into effect on January 1, 2027. The Undersigned Entities have concerns regarding this proposed timeline for implementation. While some proposed changes to the customer disclosure form, such as terminology changes and some additions, are minor and could be implemented more quickly, other elements such as the definitions on the customer disclosure form directly relate to or reference the standardized inputs, assumptions, and methodologies which would not be required until January 1, 2027. This mismatch would create potential challenges for implementation. As a practical matter, even if the customer disclosure form changes were approved within the next few weeks, that would leave insufficient time to ensure that contractors would be able to include the updated disclosure form with all new contracts starting by July 1.

The Authority should finalize any new requirements and disclosure form changes at the same time because they necessarily impact each other. Approving some changes while still considering others will make it harder to achieve compliance among the broader RRES contractor industry and potentially require multiple changes to the same document within a short period of time (i.e. the customer disclosure form). It is critical that there is clarity on the

requirements and that there is an opportunity for docket participants to review the proposed changes to the disclosure form and standardized inputs and assumptions in combination so that any practical challenges or inconsistencies can be identified.

Most importantly, the Authority must allow for enough time for contractors to make the necessary adjustments to their systems, documents, training personnel, and potentially working with third-party vendors to ensure compliance. For example, the current schedule for this docket has a tentative Final Decision date of October 28, 2026. This would provide two months (albeit with holidays) to incorporate any changes to be ready for a January 1, 2027 implementation date. For changes that are minor or are solely within the contractors control, this timeline may be sufficient. For more complex changes, particularly if they involve working with third-parties (such as software providers who generate proposals, utility rates, or savings estimates) to ensure their systems are compliant may take additional time. Additionally for RRES contractors who have not been closely following the CCWG and this proceeding, it is unlikely they would be able to meet a January 1 compliance deadline.

At a minimum, contractors should have 90 days from when an updated customer disclosure form is available and standardized inputs, assumptions, and methodologies have been approved by the Authority to make the necessary changes to systems, processes, documentation, workflows with vendors, and employee training. Additionally, the Authority should recognize that it will necessarily take time beyond the actual implementation date for all RRES contractors to come into compliance, particularly on the standardized inputs and assumptions, and there should be sufficient flexibility for those contractors to do so.

f. Making RRES Contractors Aware of Changes

How the wide range of RRES contractors are made aware of any new requirements stemming from the CCWG Report and this annual review proceeding is an important question to consider. Some changes, such as those to the customer disclosure form itself, will be more straightforward to implement. The new customer disclosure form will become available and RRES contractors can be notified through an EDC communication and having those updated documents available on the website. Ultimately, if an RRES contractor is using an outdated version, at some point they will not be able to receive RRES or interconnection approval.

The changes to the inputs and assumptions and net savings methodologies are much more difficult to enforce. Not only are they more complicated, but they may impact a broader set of company processes, documents, and personnel. As has been seen with the Annual Compliance Filing, even with robust materials and education & outreach efforts by EOE, it is difficult to achieve compliance for all contractors. Email notices to RRES applicants, webinars, and public documents outlining the requirements will all be important to reach as many contractors as possible. Additionally, more time may be required between when the new requirements are ordered and when compliance is expected to account for the fact that most RRES contractors are likely unaware that such changes are even under consideration.

g. Residential Tariff Model Inputs

Currently the Residential Tariff Model uses a .5% degradation rate which matches what would be required under the proposed standardized input. The Undersigned Entities do not have any issue with aligning that input for the Residential Tariff Model. The ISO-NE Distributed Generation Forecast used for the annual CELT report includes a degradation rate that is based on the NREL data. Regarding aligning the utility rate escalation with a 20-year term instead of the current 16-year term, the Undersigned Entities are supportive in concept. In practice, this may

only really impact the rate setting process in this proceeding because it is not clear at this point whether the RRES successor program will have an annual rate setting process.

h. Role of PowerClerk

If the customer disclosure form is provided contemporaneously with the solar contract, as we believe it should, that must and should be done outside of PowerClerk. It is not practical for contractors to create RRES applications in PowerClerk before a contract has been signed in order to generate a disclosure form. Customer disclosure forms can be filled out manually or through automation that is tied to information in the contract, neither of which requires anything that PowerClerk provides. Additionally, generating the customer disclosure form in PowerClerk would require sales-focused employees to be trained and responsible for managing the start of an RRES application in the PowerClerk portal despite other employees typically being responsible for that task. PowerClerk should simply be able to receive an uploaded, signed customer disclosure form as part of the RRES application. There is no need for contractors to manually enter customer disclosure form information as part of the RRES application.

IV. Solar Production Measurement for DC-Coupled Solar and Storage Systems

The Undersigned Entities do not believe the perceived issues identified in UI's Motion for Clarification warrant the proposed solution. UI's assertion that there is no way to measure exclusively the PV generation from a site is incorrect - it is done successfully across Connecticut today and has been for as long as DC-coupled systems have been available. We believe the potential issues raised in the Motion can be, or already are, solved without requiring the significant steps of moving customers to a standardized capacity factor approach and preventing

the sale of RECs from all DC-coupled solar plus storage systems. The Undersigned Entities would be willing to participate in a technical meeting if necessary.

The measurement desired by UI is accomplished by configuring the wiring and charging controls in line with what is required for RRES participation under Section VII.T of the Residential Renewable Energy Solutions Program Manual. Installers place the production meter directly upstream of the shared inverter and commission the battery to only charge from the DC-connected PV array. This ensures that the only energy that passes across the production meter is PV-generated.

All three of the concerns UI raises in their motion are unfounded:

- **REC Compliance** - the wiring and charging configuration already required for RRES participation and described above ensures that the only energy that the production meter registers comes from the coupled PV, an eligible resource. The only exception to this would be the minimal amount of energy the BESS had when it was installed.
- **Non-Bypassable Charge Calculation** - the wiring and charging configuration already required for RRES participation and described above captures all energy produced by the PV system. The only exceptions to this are parasitic load and the minimal amount of energy that the PV system has produced and the BESS system has stored but not yet discharged. Today, the non-bypassable charge is calculated on the net reading from the production meter, functionally capturing the same characteristics for AC and DC coupled systems.
- **Islanding Requirements** - the concern raised in the motion is counteracted by the requirements of RRES participation in Section VII.T of the Program manual. This contention is especially frustrating to hear from UI given that Tesla and Sunrun met with UI earlier this year to review these wiring diagrams.

The fact that Eversource does not share the same concerns regarding DC-coupled solar plus storage systems suggests that effective solutions are already in place or the concerns are not actually valid. If UI is still concerned with the wiring configurations and charging restrictions that have allowed RRES to operate successfully for years, we recommend the Authority convene a technical conference in which UI brings the specific configurations which are causing these concerns to be discussed with stakeholder experts. It would be helpful for UI to bring examples

of actual DC-coupled solar plus storage projects to show where these program integrity concerns are stemming from. We believe that simply not selling RECs from any DC-coupled solar plus storage system is unnecessary and would reduce ratepayer benefits provided by the program in the form of offsetting REC sales that help cover some portion of program costs. We are also concerned about how a standardized capacity factor approach would be implemented and the potential impact on affected customers. Such a change would require EDC resources and costs which may not be worthwhile for a limited number of projects for the final year of the RRES Program.

Stepping back, the Undersigned Entities do strongly support finding ways to eliminate these types of potential complications in the forthcoming RRES successor program. If at all possible, the successor program should seek to be structured in a way that does not require a separate solar production meter. Not only will this reduce the equipment on the customer's home and reduce costs but it will also simplify the interconnection process. The most important measurement occurs at the revenue meter and point of common coupling; subordinate meters complicate projects and programs, adding unnecessary costs for consumers. We believe there are other pathways in the successor program that can avoid the need for a production meter, particularly if the production meter's sole purpose is to generate RECs. These other approaches may include estimation methodologies, use of inverter telemetry, or simply recording RECs at the revenue meter.

V. Conclusion

The Undersigned Entities appreciate the opportunity to provide these written comments to the Notice and look forward to engaging throughout this annual review process.

Respectfully submitted,

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CERTIFICATION

This is to certify that on this day, the foregoing document was filed with the Public Utilities Regulatory Authority, and copies of the foregoing document were served upon each person designated on the Authority's official service list in the above referenced proceeding in accordance with R.C.S.A. § 16-1-15.

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May 28, 2026