CAE-012

The United Illuminating Company **Witness: David Hernandez**

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Date Submitted: May 28, 2026

CAE-012 Q:

CCWG Report, pp. 21-22. Explain why adders and storage incentives should not be included in net savings calculations presented to customers.

CAE-012 A:

UI understands the question of whether RRES adders and Energy Storage Solutions (ESS) incentives should be included in the standardized net savings calculations presented to customers. UI does not recommend including those items in the required standardized calculation unless and until the Authority expressly adopts a specific methodology for doing so.[1]

The required net savings calculation should remain limited to the standardized RRES solar inputs adopted by the Authority so that customer disclosures remain comparable across contractors and ownership structures. The CCWG Report reflects the same concern: UI and Eversource opposed language that would include broadly stated "performance-based incentives" because that phrase could include other adders and ESS incentives, and EOE ultimately recommended methodologies that do not include performance-based incentives in the required standardized year-one or multi-year net savings calculations.[2]

RRES adders are project- and customer-specific incentive components determined under the RRES Program rules, including eligibility and payment-beneficiary treatment. They may not be received by the same party in every project structure and should not be used to alter a standardized savings calculation absent an Authority-approved methodology. If applicable, such adders can be identified separately in customer-facing materials where accurate and supported by program records.[3]

ESS incentives should also be excluded from the RRES standardized net savings calculation because ESS is a separate statewide program administered by the Connecticut Green Bank, in partnership with the EDCs, and is designed for storage deployment, resiliency, and grid benefits. The ESS program includes its own incentive structures, eligibility rules, and program administration, and those storage incentives are not RRES solar tariff inputs or RRES adders. The CCWG Report also notes that the working group focused on RRES solar projects, not ESS/storage projects, and that questions regarding solar-plus-storage savings were not sufficiently resolved in that process. [4]

Accordingly, UI recommends that standardized RRES net savings calculations exclude RRES adders and ESS/storage incentives unless PURA adopts separate, specific treatment. This approach preserves comparability, avoids overstating or duplicating customer benefits, and does not prevent separate disclosure of applicable incentive information where such information is accurate, applicable, and supported by the governing program requirements.

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1. PURA, Interrogatories Set 1, Docket No. 26-08-02, May 11, 2026, CAE-012; EOE, Contractor Compliance Working Group Report, Docket Nos. 25-08-02 and 26-08-02, March 31, 2026, pp. 21-22.

2. EOE, Contractor Compliance Working Group Report, March 31, 2026, pp. 20-22, 42-44 (Proposals 9, 11, and 14 and related EOE recommendations).

3. Residential Renewable Energy Solutions Program Manual, Version 2026.1, effective January 1, 2026, provisions addressing income-eligible and economically distressed municipality adders and payment-beneficiary treatment; see also CAE-001 response discussion of developer/application adder indicators and UI-confirmed adder application.

4. PURA, Energy Storage Solutions Program webpage, Program Overview and Recent Changes (2025); PURA, Establishing Statewide Electric Storage Program, Docket No. 17-12-03RE03, July 28, 2021; EOE, Contractor Compliance Working Group Report, March 31, 2026, pp. 43-44.