The United Illuminating Company **Witness: Andrew Winn**
Robert Sazanowicz
Pierre Margraff

Docket No. 26-08-02

Date Submitted: August 17, 2026

CAE-028 Q:

Eversource Comments, May 28, 2026, p. 6.

a. Confirm that UI's RRES Program metering diagrams and guidelines clearly state the requirement that no load (except for parasitic load to operate the coupled solar and storage system) may be connected behind the utility production meter.

b. Does UI have evidence of customers who have installed system configurations that do not comply with this requirement? If so, provide the number of such customers and discuss the specific system configurations involved.

CAE-028 A:

a. The United Illuminating Company's ("UI") Residential Renewable Energy Solutions ("RRES") Program metering diagrams and guidelines do not expressly state, as a standalone requirement, that no customer load other than parasitic load may be connected behind the utility production meter. The purpose of the RRES production metering framework is to measure solar-only generation; however, the metering diagrams were developed and revised in response to PURA directives and decisions requiring the electric distribution companies ("EDCs") to accommodate backup-capable solar-plus-storage configurations.

   The relevant dockets proceedings include Docket No. 22-08-02, Order No. 16, which directed the EDCs to develop and submit backup-capable solar-plus-storage configuration proposals; Docket No. 24-08-02, which established the Solar Production Charge/non-bypassable charge based on generation; and Docket No. 25-08-02, Order No. 23, which directed updated RRES Program materials, including metering diagrams. Taken together, these directives created practical metering issues for certain DC-coupled and backup-capable systems, where the production meter may record combined inverter output, battery-related flows, parasitic load, auxiliary load, or backup load rather than PV-only production.

   Accordingly, UI does not interpret its existing Program materials as expressly establishing the "no load behind the production meter" requirement. Adding such a categorical statement without further PURA clarification could be inconsistent with the configurations PURA directed the EDCs to support and may create confusion regarding permissible

metering arrangements under the RRES Program for developers, Program administrators. and customers.

b. As stated in UI's May 5th, 2026 Motion for Clarification in Docket No. 25-08-02 the Company has identified certain customer configurations that may not permit the production meter to independently isolate PV-only generation, including DC-coupled solar-plus-storage systems, shared inverter or all-in-one inverter designs, and backup-capable configurations where parasitic, auxiliary, or backup load may be located in the production-meter measurement path. However, the Company is not aware of any customers who have installed and energized systems with configurations that do not comply with the approved Program wiring diagrams.