Explanation of Proposed NRES Year 6 Redline Edits

Pursuant to Order No. 14 of the December 17, 2025 Decision of the Public Utilities Regulatory Authority ("Authority") issued in Docket No. 25-08-03, the Electric Distribution Companies' (EDCs) jointly submit the following summary of proposed redline edits to the Program Manual, Request for Proposals (RFP), and associated documentation. These proposed changes are intended to enhance Program clarity for participants, maximize project eligibility, as well as further NRES Program objectives. The EDCs continuously monitor customer feedback and attempt to alleviate confusion, eliminate inconsistencies, and proactively address disqualifiable offenses through continuous improvements to customer resources. The EDCs appreciate the opportunity to provide insight into Program operations and support the continued development and successful implementation of the Program.

Improvements for Clarity

1. Clarified that the Tariff Payment Beneficiary section of the Bid Certification Form and the Tariff Agreement Cover Sheet is only required if an entity other than the Tariff Agreement Customer is designated by the Customer to receive payments. This will reduce duplicative Customer signatures and unnecessary data collection requirements. Clarifying text was added to the Bid Certification Form and the RFP.
2. Projects may be sized to New Construction load or Beneficial Electrification load. Program documents were updated to consistently reflect the requirement that any new load must materialize within five years of the Project's In-Service date, rather than the Bid submission date. Updates were made to the Terms and Conditions, the RFP, and the Professional Engineer Certification Form.

3. Clarified that the Project size and compensation structure cannot be modified after Bid submission. Both EDCs have received requests from Bidders, during Bid eligibility review, to modify Project size or compensation structure (Netting vs. Buy-All) in order to avoid Bid disqualification for failure to meet an eligibility requirement such as size-to-load. The EDCs review dozens of eligibility requirements for each Bid, many of which are intertwined with other eligibility requirements. Changing such a fundamental aspect of a Bid would require numerous other changes to the Bid and would prompt a second eligibility screening, which would delay the RFP schedule. Further, it is stated in the Program Manual and the RFP, that the information submitted in the Bid is firm and binding upon submission. The EDCs allow correction of as many eligibility issues as possible without compromising the integrity of the RFP. It is incumbent upon Program Bidders to review all relevant Program documents and ensure their Bid adheres to all Program requirements, as they attest to doing when signing the Bid Certification Form. Clarifying text was added to the Bid Certification Form, the Program Manual, and the RFP.
4. Clarified that Projects must receive Approval to Energize after the opening date of the solicitation in which the Project is participating. The EDCs received numerous inquiries regarding whether receiving Approval to Energize before the close of the RFP would disqualify the Project.
5. Several other minor improvements are suggested, such as consolidation of the Bid Certification Form Project Site Owner's page (page 5) to return the Notary section to the same page; consolidated sections 4.1.2 and 4.1.3 into one section and added language to clarify one Netting Bid per revenue meter and one Buy-All Bid per parcel can be submitted in a single solicitation.
6. Added previous footnote 8 as section 4.2.1.1 for improved visibility and clarified language within.
7. Text was added to note that any remaining unused budget or capacity will expire at the conclusion of the Year 6 RFP, since the NRES Program will be replaced by a successor program in 2028.