Save the Sound®
Action for our region's environment.

ANNUAL SHARED CLEAN ENERGY	**:**	**DOCKET NO. 26-08-04**
FACILITY PROGRAM REVIEW – YEAR 8	**:**	**NOVEMBER 2, 2026**

WRITTEN EXCEPTIONS

Save the Sound appreciates the opportunity to submit these Written Exceptions in response to the Notice of Witten Exceptions, dated October 19, 2026, issued by the Public Utilities Regulatory Authority ("PURA" or the "Authority") in the above-captioned proceeding.

Price Cap

Save the Sound takes exception to the Authority's determination to lower the price cap to $179/MWh.

General Statutes § 16-244z(a)(5) provides, that "the maximum selected purchase price of energy and renewable energy certificates on a cents-per-kilowatt-hour basis in any given solicitation shall not exceed such maximum selected purchase price for the same resources in the prior year's solicitation, unless the authority makes a determination that there are changed circumstances in any given year."

The Year 7 price cap was set at $182.94/MWh (an increase from the Year 6 bid price of $133/MWh). The Year 7 price cap was set with the recognition that policies at the federal level, including the early wind-down of available tax credits, had significantly increased the cost to develop commercial solar projects. In reliance on these changed circumstances, the Authority for the first time increased rather than decreased the cap from the level of the previous year. The highest selected bid price in Year 7 (considering eligible bid preferences) was $182.93/MWh. Given the solicitation results, it appears that the Year 7 price cap was set appropriately to offset the impact of the elimination of the federal tax credits and was essentially "spot on."

Since the Year 7 solicitation there has been no documented improvement in the economics of commercial solar projects. Yet, if the Year 7 price cap had been $179/MWh, no project that submitted bids in UI territory in Year 7 would have been eligible, as the project bid prices ranged from 181.89/MWh to $182.93/MWh.[1] We recognize that such a lower bid price would not have disqualified any selected projects in Eversource territory, but it also would have been unnecessary to produce cost-competitive bids below the price cap. The (as evaluated)

[1] Docket No. 26-08-04, Motion No. 7, UI Motion for Approval of Orders No. 9 & 10, Attachment B (June 18, 2026).

bids selected in Eversource territory ranged from $143.95/MWh to $164.88.[2] Projects not selected ranged from $169.20/MWh to $181.79.[3]

As those Year 7 results indicate, a bid price at the level suggested by the Authority would likely preclude any successful projects in UI territory, while also being unnecessary to introduce more competitive price bidding. For example, in the Year 6 solicitation (operating under the $133/MWh price cap prior to the impact of federal headwinds for solar projects), UI received only a single bid.[4] The lack of bids highlights the well-recognized cost difficulties faced by projects in UI territory. Despite the relative lack of bids, however, that single project bid in below the price cap at $125/MWh,[5] indicating that the structure of the blind bidding solicitation process incentivizes projects to bid at the lowest viable price to ensure success, even in the absence of robust participation.

We recognize that an additional rationale adopted by the Authority for selecting its recommended Year 8 price cap is alignment with the NRES large zero-emission buy-all price cap. That consideration also supported the Authority's selection of the Year 7 price cap.[6] Historically, however, the NRES program has enjoyed more robust participation than the SCEF program, suggesting that all things being equal projects are more likely to bid into the NRES program than the SCEF program. As noted by the Authority in its Year 7 Final Deicsion:

> The NRES Program, with its higher baseline buy-all price cap *and more streamlined application process* [emphasis added], may inadvertently be competing with the SCEF Program for developer participation and capital. See UI Interrog. Resp. CAE-1; Eversource Interrog. Resp. CAE-1; Verogy Interrog. Resp. CAE1; Allco Interrog. Resp. CAE-1. Inter-program competition risks diverting investment away from the SCEF Program, undermining the policy objective of ensuring equitable access to clean energy for LMI subscribers.[7]

While in that earlier decision, the Authority concluded that a harmonized approach to price-setting between the NRES and SECF programs was warranted, that was in the context of *raising* the SCEF price cap to match the NRES price cap in order to narrow the competitive structural advantages of the NRES program from a developer's perspective. In the instant case, the Authority is considering *lowering* the SCEF price cap to match the NRES program, thereby reducing the incentive for developers to choose to participate in the SCEF program versus the NRES program.

On substantially the same basis that informed the Authority's decision previously, including the specific and unique benefits of the SCEF program for low-income customers, Save the Sound believes that authorizing a

[2] Docket No. 26-08-04, Motion No. 6. Eversource Motion for Approval of Order No. 9 & 10, Attachment B (May 15, 2026).
[3] *Id*.
[4] Docket No. 24-08-04, Motion No. 8, UI Motion for approval of Orders 9 & 10, Attachment B (June 30, 2025).
[5] *Id*.
[6] Docket No. 25-08-04, Final Decision at 10 (Dec. 17, 2025).
[7] *Id*.

slightly higher price cap for the SCEF program versus the NRES program in the final year of the program is warranted.

Given that (1) this is the final year of the SCEF program, (2) there is record evidence that project economics have gotten worse -not better - since the Year 7 solicitation due to federal tariff policies,[8] (3) there is already concern about stranding program project capacity, (4) a lower price cap appears unnecessary to introduce competitive pricing, and (5) a lower price cap may preclude successful project bids in UI territory, we encourage the Authority to reconsider its position with respect to the Year 8 price cap. We recommend that the Authority adopt the $182.93/MWh price cap recommended by the EDCs, DEEP, and Save the Sound (and not opposed by OCC). Save the Sound believes that the record clearly demonstrates that this is the appropriate price cap to ensure significant project participation in both EDC service territories, while still ensuring a cost competitive bid selection process.

Bid Preferences

Save the Sound supports the Authority's determination to maintain the existing program bid preferences for the landfill/brownfields and solar canopy project categories. Specifically, the Authority has concluded that it is appropriate to maintain a 20% bid preference for landfill/brownfield projects and a 40% bid project for solar canopy projects. As noted by Save the Sound in its prior written comments, we believe that maintaining the existing bid preferences is supported by the Year 7 solicitation results.

Development Period Security

While Save the Sound did not opine on the issue of Development Period Security previously, we would like to take the opportunity to note our appreciation of the Authority's decision on that issue. We believe that the requirement to set forth specific and clearly articulated guidance and process rules for the return of Development Period Security, as well as the requirement for an EDC to provide interest if it fails to return such development security within the 45-day window, is appropriate.

CONCLUSION

Save the Sound appreciates the efforts that the Authority, DEEP, the EDCs, and stakeholders have devoted to ensuring that the SCEF program is successful as it enters its final year under the current program framework.

[8] *See* Docket No. 26-08-04, Proposed Final Deicsion at 6, (Oct. 19, 2026), citing Verogy Comments at 1-2 (Sept. 14, 2026). We recognize that the Authority characterizes the likelihood of increased costs as "speculative." However, there does not appear to be any record evidence that project costs have *decreased* in the past year.

Save the Sound does not request any oral argument regarding the Proposed Final Decision but reserves the right to participate if oral arguments are held.

Respectfully submitted,

Charles J. Rothenberger
Director of Government Relations, CT

CERTIFICATION

This is to certify that on this 2nd day of November 2026 a copy of the foregoing document was served upon each person designated on the Authority's official service list in this proceeding in accordance with R.C.S.A. § 16-1-15.

By: */s/* Charles J. Rothenberger

Charles J. Rothenberger
Commissioner of the Superior Court