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

SEPTEMBER 14, 2026

WRITTEN COMMENTS

Save the Sound respectfully submits the following written comments as part of the annual review of the Shared Clean Energy Facility (SCEF) program – Year 8 in response to the Notice of Request for Written Comments issued by the Public Utilities Regulatory Authority (the Authority) on August 25, 2026.

The Authority has requested that docket Participants and interested stakeholders provide written comments on a number of topics, including the following:

1. Procurement Price Caps

In the prior annual review, the Authority adopted a procurement price cap of $182.94/MWh for the SCEF Program, consistent with the 2026 large Non-Residential Renewable Energy Solutions (NRES) zero-emission buy-all price cap, to minimize potential intra-program competition between the NRES and SCEF Programs. Year 7 Decision, pp. 10-11.

For Program Year 8, the Authority seeks stakeholder input regarding the appropriate procurement price cap for the SCEF Program. Any proposed modification to the current price cap must be supported by a clear rationale and substantial evidence. At a minimum, comments should address:

- **Potential ratepayer impacts; and**
- **The effect of the proposed price cap on developer participation and overall project viability.**

Stakeholders are encouraged to support their recommendations with relevant Program trends, project development data, market analyses, or other pertinent information.

As conveyed in our earlier comments to the Department of Energy and Environmental Protection (DEEP), Save the Sound supports DEEP's recommended Price Cap of $182.93/MWh for Year 8 of the SCEF program.[1]

This recommended cap level complies with the legislative guidance provided in section 16-244z(a)(5), which states that "the maximum selected purchase price of energy and renewable energy certificates on a cents-per-kilowatt-hour

[1] Save the Sound, Comments on SCEF Year 8 Recommendations (July 24, 2026), https://www.dpuc.state.ct.us/DEEPEnergy.nsf/c6c6d525f7cdd1168525797d0047c5bf/05790d7d08dce01c85258e410044b83e/$FILE/Save%20the%20Sound%20-%20Comments%20on%20SCEF%20Year%208%20Recommendations%207.24.26.pdf.

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."

$182.93 is in fact the highest bid amount received in the Year 7 solicitation, and there was relatively robust participation in that solicitation. Each EDC received bids for capacity in excess of their annual program allocation. UI received bids for 10.49 MWs of project capacity, while Eversource received bids for 77.251 MWs of capacity.[2]

Are there any current "changed circumstances" that suggest a higher Program Price Cap is necessary?

While we have previously expressed our concern regarding the impact that the early sunsetting of the federal tax credit could have on the SCEF program, we are cognizant that in setting the Year 7 price cap, the Authority took into account the impact of the elimination of the federal tax credits by increasing the price cap from $133/MW to 182.94/MW.[3] This increase appears to have had the desired effect, at least for the time being.

However, we defer to project developers as to whether they are facing any *additional* challenges this year versus last year that would create upward pressure on projects and warrant a higher price cap. We note, for example, that the federal administration continues to implement policies that create additional barriers to the deployment of renewable energy in the United States.

For instance, the Solar Energy Industry Association has identified that ongoing federal trade actions continue to create constraints on the domestic solar industry. Currently, the United States lacks sufficient cell manufacturing capacity to meet expected demand. Meanwhile, this past Spring the Commerce Department announced new tariffs on solar cells and modules on countries supplying nearly 80% of US cell imports.[4] Additionally, on July 1, 2025, the Commerce Department initiated a Section 232 investigation to determine the effects on the national security of imports of polysilicon and its derivatives.[5] "Given the broad applicability of the action, it could severely constrain manufacturing activity for some domestic producers."[6]

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[2] We note that some of these bids were disqualified. *See* Docket No. 25-08-04, United Illuminating, Motion No. 7, Motion for Review and Approval of Orders 9 &10,Attachment B (June 18, 2026), https://www.dpuc.state.ct.us/dockcurr.nsf/8e6fc37a54110e3e852576190052b64d/88441fa8adf97bfe85258e1a006d89a5?OpenDocument; Docket No. 25-08-04, Connecticut Light & Power Company d/b/a Eversource Energy, Motion No. 6, Motion for Approval of Orders 9 10, Attachment B (May, 15, 2026), https://www.dpuc.state.ct.us/dockcurr.nsf/8e6fc37a54110e3e852576190052b64d/948f39513f06712f85258df8005c984b?OpenDocument.

[3] Public Utilities Regulatory Authority, Docket No, 25-08-04, Annual Shared Clean Energy Facility Program Review – Year 7, Final Decision at 8-11 (Dec. 17, 2025)

[4] Solar Energy Industries Association, *Solar Market Insight Report Q2 2026* (June 10, 2026) ("Currently, the US only has 3 GW of cell capacity. While several new cell factories are in development, these are not expected to be enough to supply all domestic module factories. In the spring, the Department of Commerce announced high preliminary countervailing (CVD) and anti-dumping (AD) tariff rates for solar cells and modules from India, Indonesia, and Laos. These nations, together with Malaysia, Thailand, and Vietnam (which are already subject to tariffs) were the source of 78% of cell imports last year."); https://seia.org/research-resources/solar-market-insight-report-q2-2026/.

[5] Notice of Request for Public Comments on Section 232 National Security Investigation of Imports of Polysilicon and its Derivatives, 90 Fed Reg, 31955 (July 16, 2026), https://www.govinfo.gov/content/pkg/FR-2025-07-16/pdf/2025-13345.pdf.

[6] SEIA, s*upra* note 4.

Finally, in August of this year, the administration imposed a 15% tariff with minimum import prices on a number of solar PV components, including polysilicon, ingots, wafers, cells, and modules.[7] These new tariff rates will be effective on December 4, 2026.[8]

While we are not in a position to predict the exact impact that these trade moves will have on the development costs for program participants, we highlight them for the awareness of all the parties and believe that it should be an area of inquiry in ensuring that the adopted the price cap allows for a successful Year 8 project solicitation.

2. Budget Reallocation

For the Year 7 procurement, the Authority adopted separate budget caps for each EDC, pursuant to General Statutes §§ 16-244z(c)(1)(A) and 16-244z(c)(1)(B). Year 7 Decision, pp. 8-9. Specifically, the approved 2026 SCEF budget caps were $9,864,750.81 for Eversource and $5,709,894.63 for UI. Id., p. 10.

However, these allocations do not reflect the typical 80/20 allocation between the EDCs based on their respective shares of statewide electric revenues. Rather, the approved values reflected the projected payment obligations associated with projects selected during the Year 5 procurement. Unlike Eversource, UI selected a fuel cell project during the Year 5 procurement. Id., p. 9, fn. 5. Because fuel cell projects generally operate at higher capacity factors than conventional solar projects, UI's resulting SCEF budget allocation exceeded the amount that would have resulted under the standard 80/20 revenue-based allocation methodology. Id. Importantly, following enactment of Public Act 25-173, An Act Concerning Energy Affordability, Access and Accountability, fuel cells are no longer eligible for participation in the SCEF Program.

Accordingly, the Authority is concerned that UI's allocated budget may remain underutilized during the final year of the SCEF Program, particularly given UI's comparatively urban service territory, the more limited availability of developable land for SCEF projects, and the fact that UI's elevated budget allocation was attributable to the selection of a fuel cell project rather than a greater volume of awarded projects during the Year 5 procurement.

Therefore, the Authority requests stakeholder comment on whether the combined SCEF budget of $15,574,645.44 should be reallocated between the EDCs using the standard 80/20 revenue-based allocation methodology. Under such an approach, the resulting allocations would be $12,459,716.35 for Eversource and $3,114,929.09 for UI.

The Authority will not consider proposals for adjusting the overall SCEF budget cap.

Save the Sound supports maintaining the current budget allocation, and not adjusting the allocation to reflect the typical 80/20 split between the EDCs. We believe that continuing a higher proportional budget allocation for the UI service territory may be warranted, notwithstanding the elimination of fuel cell projects from SCEF eligibility. Our position is based on the historical data demonstrating that project bids in UI territory are consistently higher on a $/MWh basis than project bids in Eversource territory. Accordingly, UI's proportional budget commitments for projects will be greater than its 20% proportional capacity allocation. If the Authority wishes to retain an 80/20 split in program capacity allocation in the respective EDC territories, a proportionately higher budget for UI helps to achieve that goal.

However, we recognize that UI has also consistently received far fewer bids than Eversource and has generally accepted all eligible bids that were not otherwise withdrawn or disqualified. By contrast, Eversource has frequently left

[7] Solar Energy Industries Association, *Solar Market Insight Report Q3 2026* (September 10, 2026), https://seia.org/research-resources/solar-market-insight-report-q3-2026/.
[8] *Id*.

eligible projects "stranded" in the bid queue since their selection would cause Eversource's annual capacity cap to be exceeded.[9]

To ensure that we don't strand any of the available program capacity or budget, we recommend that a "blended" or hybrid approach could ensure that UI's budget remains sufficient to meet its allocated capacity auction commitments, while also ensuring that budget dollars and available MW capacity do not go unused. Accordingly, we recommend that following the conclusion of the initial awards for the Year 8 solicitation, the Authority allow any unused UI budget/capacity allocation to be assigned to the next eligible bids in the Eversource queue.

3. Bid Preferences

During the Year 7 annual review, the Authority retained the same bid preference categories adopted for Year 6 of the SCEF Program: specifically, a 40% bid preference for solar canopy projects and a 20% bid preference for landfill or brownfield projects. Year 7 Decision, pp. 12-13.

For Program Year 8, the Authority seeks stakeholder feedback regarding the continued appropriateness of the existing bid preferences and any proposed modifications thereto. As with the procurement price cap discussed above, the Authority expects stakeholders to provide a comprehensive justification for any recommended changes, including an assessment of:

- **Potential ratepayer impacts;**
- **Effects on stakeholder participation, project diversity, and overall market competitiveness; and**
- **Consistency with and advancement of the SCEF Program's broader objectives.**

As conveyed in our earlier comments to DEEP, Save the Sound generally supports DEEP's recommendation to maintain the solar canopy and brownfield/landfill bid preferences at 40% and 20%, respectively.[10]

Landfill and Brownfield Projects

We note, however, that in the Year 7 solicitation, UI received no proposals for projects sited on a brownfield or landfill, while Eversource received just one proposal for a landfill-sited project. The successful landfill project was the second lowest bid received by Eversource (factoring in the 20% bid preference). Given its placement in the bid queue, it would appear that the 20% bid preference is sufficient to support landfill-sited projects, and it seems that the relative lack of proposals for such projects may be the result of factors other than price.

With no landfill or brownfield projects submitted in the previous Year 6 solicitation and with just one such project bid in the Year 7 solicitation, there appears to be a general slowing of projects in this project category within the SCEF

9 *See, e.g.*, SCEF awarded bids for the Year 3, Year 4, and Year 7 program solicitations. In each of those years, UI selected all the eligible bids (i.e., those not disqualified or withdrawn) submitted, while Eversource stranded nine projects, ten projects, and seven projects (respectively) that were eligible for selection in the bid queue. Docket No. 21-08-04, Motion No. 8 (UI), Motion for Approval of Year 3 Selections, Attachment B (May 18, 2022); Docket No. 21-08-04, Motion No. 12 (Eversource) – Motion for Review and Approval of Orders Nos. 4 and 5, Attachment B (June 15, 2022); Docket No. 22-08-04, Motion No. 11 (Eversource), Motion for Review and Approval of Year 4 Selections (May 16, 2023); Docket No. 22-08-04, Motion No. 12 (UI), Motion for Review and Approval of Year 4 Selections (May 12, 2023); Docket No 25-08-04, Motion No. 6 (Eversource), Motion for Approval of Orders 9 & 10, Attachment B (May 15, 2026); Docket No. 25-08-04, Motion No. 7 (UI), Motion for Review and Approval of Orders 9 &10, Attachment B (June 18, 2026).

10 Save the Sound, *supra* note 1.

program While this could be attributable to a variety of factors, given the changes to the federal tax credits and trade policy as noted above, solar projects of all types will face increased economic pressures. Additional specific input from the solar industry regarding changed circumstances for new projects should inform the incentive structure for SCEF projects across the spectrum.

Solar Canopy Projects

We note that in the Year 7 solicitation, UI received no proposals for solar canopy projects, while Eversource received proposals for two such projects. These two projects were bid at $274.15/MWh (evaluated bid price of $164.49/MWh) and $298.13/MWh (evaluated bid price of $178.88/MW/h). These projects ranked 7th and 16th out of the twenty submitted bids, with the former project being one of the ten selected low-bid projects. Given their placement in the bid queue, it appears that the 40% bid preference is sufficient to support solar canopy projects, although increasing the bid preference would result in more canopy projects being selected.[11]

4. Proposed Programmatic Changes

Lastly, the Authority welcomes stakeholder input on targeted programmatic modifications that could improve the effectiveness and clarity of the SCEF Program in its upcoming year.

Please note that the Authority is not considering structural changes to the SCEF Program at this time, given the Program's maturity as it enters its final year. Accordingly, any recommendations should be limited to discrete, incremental improvements, such as:

- **Clarifying existing requirements or definitions; or**
- **Improving transparency or efficiency in the application or selection process.**

Suggestions should be specific, actionable, and focused on refining—rather than redefining—the existing Program framework.

Given that this is the final year for the current SCEF program before it is replaced by a successor "Community Solar" program pursuant to Public Act 26-127, Save the Sound has no recommendations for substantive programmatic changes. There will likely, however, be recommendations for the successor program that improve upon certain aspects of the SCEF program moving forward.

Conclusion

Thank you for the opportunity to submit these comments. We look forward to continuing our engagement with the Authority, the EDCs and all the stakeholders to ensure the continued success of the SCEF program.

Respectfully submitted,

/s/ Charles J. Rothenberger
Charles J. Rothenberger
Director of Government Relations, CT

[11] It is worth noting that, following two years in which no solar canopy project bids were submitted, the solar canopy bid preference was raised from 30% to 40% for the 2025 (Year 6) solicitation. Following that change, Eversource received one successful canopy project bid in Year 6, and as noted above Eversource received two solar canopy bids in the most recent Year 7 solicitation. We would strongly argue against any proposals to lower the canopy bid preference below 40%.

CERTIFICATION

This is to certify that on this 14h day of September 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, Esq.
Director of Government Relations, CT