STATE OF CONNECTICUT
PUBLIC UTILITIES REGULATORY AUTHORITY

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

RESPONSE TO AUTHORITY'S REQUEST FOR WRITTEN EXCEPTIONS ISSUED OCTOBER 19, 2026

Verogy Holdings, LLC ("Verogy") respectfully submits the following written exceptions to the Annual Shared Clean Energy Facility Program Review – Year 8 Proposed Final Decision ("The Proposed Decision") issued by the Public Utilities Regulatory Authority ("The Authority") dated October 19, 2026, intended to align the Shared Clean Energy Facility ("SCEF") Program with Program Objectives[1] and other Connecticut climate goals.

Please find Verogy's exceptions below:

1. **PRICE CAP**

a) Exception: Section IV.B.4 of The Proposed Decision states in part:

> "The Year 8 SCEF price cap shall be set at $179.00/MWh, consistent with the recommended NRES large buy-all price cap."

Verogy strongly disagrees with establishing SCEF price caps based on results from the NRES procurements. As stated in Verogy's written comments dated September 14, 2026[2] filed in the subject docket, Verogy asserts that SCEF price caps should increase due to changed circumstances outside of SCEF Program participants control including newly imposed tariffs amongst other reasons.

[1] The objectives (Program Objectives) outlined in the Year 5 SCEF Final Decision include:
1. Annually and cost-effectively procure up to 50 megawatts of SCEFs, as defined in Conn. Gen. Stat § 16-244z;
2. Provide savings to specific categories of customers, particularly customers with low- to moderate-income (LMI), low-income service organizations, and customers who reside in environmental justice communities; and
3. Lower or eliminate barriers to entry for Subscriber Organizations, if and when possible.

[2] Written Comments for [26-08-04] date filed 09/14/2026 [ ]

Notwithstanding this assertion, should The Authority determine that newly imposed tariffs and other economy-wide inflationary pressures are insufficient to increase price caps, The Authority's proposed ruling to decrease SCEF price caps based on results from a separate program when there is already a defined process to establish price caps represents flawed thinking and contradicts established precedent and guidelines ruling SCEF price caps.

Verogy's rationale for this assertion is twofold. First, there are several differentiating features and rules that make the SCEF and NRES programs unique which have not been "levelized" by The Authority. Second, this proposed decision contradicts pre-existing SCEF program documentation and statute governing establishment of price caps.

There are several examples of distinction between the SCEF and NRES programs which have not been reconciled by The Authority to date. These include canopy bid preference levels (40% in SCEF vs 30% in NRES), the presence of an Operating Period Security deposit in SCEF vs the absence of one in NRES, the lack of a Distressed Municipality bid preference in SCEF vs the presence of one in NRES, and others. Despite some similarities, the SCEF and NRES programs are clearly distinct and therefore The Authority should not unilaterally use results from one program to dictate the framework of the other.

Second, as described in DEEP's SCEF Year 8 recommendations filed September 1, 2026 in the subject docket[3], Conn. Gen. Stat. § 16-244z(a)(5) prescribes a price cap as the highest selected bid price from the previous SCEF procurement. The highest selected bid price from the SCEF Year 7 procurement, as of the time of these exceptions, is $182.93/MWh. Therefore, Verogy asserts that The Authority's proposed price cap of $179.00/MWh contradicts Conn. Gen. Stat. § 16-244z(a)(5).

Should The Authority judge that there are no changed circumstances to justify an increase to the SCEF price cap, then The Authority should defer to existing precedent and statute to establish the SCEF Year 8 price cap at $182.93/MWh.

[3] Compliance Filings for [26-08-04] dated 09/01/2026 [Compliance Order No.15]

I certify that a copy of this submission has been filed with the Authority as an electronic web filing and is complete. Verogy thanks the Authority for the opportunity to provide written exceptions for consideration in the SCEF Year 8 program development.

Respectfully submitted,



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