STATE OF CONNECTICUT
PUBLIC UTILITIES REGULATORY AUTHORITY

ANNUAL SHARED CLEAN ENERGY FACILITY PROGRAM REVIEW - YEAR 8	**:**	**DOCKET NO. 26-08-04**
	:	**September 11, 2026**

JOINT WRITTEN COMMENTS OF
THE CONNECTICUT LIGHT AND POWER COMPANY
D/B/A EVERSOURCE ENERGY AND THE UNITED ILLUMINATING COMPANY

The Connecticut Light and Power Company d/b/a Eversource Energy ("Eversource") and The United Illuminating Company ("UI") (collectively the "Companies" or the "EDCs") hereby submit these written comments in response to the Notice of Request for Written Comments ("Notice") issued by the Public Utilities Regulatory Authority ("Authority" or "PURA") on August 25, 2026. On April 8, 2026, PURA issued a Notice of Proceeding in the above-referenced docket to review key program metrics with stakeholders and to evaluate whether and how the program should be modified to more fully accomplish the objectives established in the Docket No. 19-07-01 Decision.

To facilitate PURA's evaluation of the Shared Clean Energy Facilities ("SCEF") Program, on August 25, 2026, PURA issued the Notice, in which PURA requested docket Participants and interested stakeholders to file written comments concerning the below issues by September 14, 2026. The EDCs appreciate the opportunity to discuss the issues identified in the Notice and address them in-turn below.

I. BACKGROUND

On December 18, 2019, PURA issued a final decision in Docket No. 19-07-01, Review of Statewide Shared Clean Energy Facility Program Requirements, approving with modification the proposed SCEF program requirements ("Modified Program Requirements"). Section 3.3 of the Modified Program Requirements directs the Department of Energy and Environmental

Protection ("DEEP") to submit its proposed Procurement Price Cap and Bid Preferences to the Authority no later than September 1, beginning in 2021 and annually thereafter.

On December 17, 2025, the Authority issued a Final Decision in Docket No. 25-08-04, Annual Shared Clean Energy Facility Program Review – Year 7 ("Year 7 Decision"), setting the Procurement Price Cap and Bid Preferences for the Year 7 SCEF procurement. See Year 7 Decision, p. 5-13. Additionally, the Authority directed the EDCs to submit annually by September 1, 2026, "the current SCEF Program Requirements and all [request for proposal (RFP)] documents …proposing modifications, as necessary and appropriate, that will allow the SCEF Program to better meet the Program Objectives." Id., p. 18.

Accordingly, the Authority will evaluate DEEP's proposed Procurement Price Cap and Bid Preferences, along with any proposed modifications to the SCEF Program requirements submitted by the EDCs, as part of its review of potential programmatic changes for Year 8 of the SCEF Program.

II. COMMENTS

In response to the Notice, the Companies offer the following comments regarding the topics provided in the notice.

1. PRICE CAP

> *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.*
>
> - *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.*

EDC Response:

The EDCs support maintaining the SCEF procurement Price Cap at $182.93/MWh for Program Year 8. The Companies believe the existing Price Cap continues to provide an appropriate balance between encouraging project development and protecting ratepayers from unnecessarily high procurement costs.

Year 7 procurement results provide meaningful evidence that the existing Price Cap remains sufficient to support robust participation. In Eversource's service territory, participation was strong, with the procurement being significantly oversubscribed at the established Price Cap. These results demonstrate that, notwithstanding changes in federal incentives and other market conditions, the existing Price Cap continues to provide sufficient economic value to attract a substantial volume of viable SCEF projects.

The EDCs recognize that initial Year 7 procurement results in UI's service territory were comparatively undersubscribed. However, the results in UI's service territory should not on their own be viewed as an indication that the existing Price Cap is insufficient. The availability of suitable sites for SCEF development is materially more constrained within UI's comparatively urban service territory, including limitations associated with the availability of developable land.

In addition, the Companies also recognize that project development costs remain subject to evolving market conditions, including changes in federal trade policy and equipment costs. However, the Companies believe the strong participation observed at the current Price Cap, particularly within Eversource's service territory, demonstrates that there is not presently sufficient evidence to support an increase in the Year 8 Price Cap.

Maintaining the current Price Cap will also allow the SCEF program to maximize the amount of renewable energy capacity procured within the established annual budget, while

avoiding unnecessary increases in costs to ratepayers. Accordingly, the Companies recommend that PURA maintain the $182.93/MWh Price Cap for Program Year 8.

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.

EDC Response:

The Companies do not recommend reallocating the Year 8 SCEF budget between the EDCs using the standard 80/20 revenue-based allocation methodology.

The Year 7 Decision established the EDC-specific budget allocations based on the estimated annual compensation obligations associated with projects selected in the 2024 SCEF procurement. This approach was intended to ensure that the program budget appropriately

reflected the actual payment obligations resulting from prior procurements while maintaining control over the costs of the SCEF Program. The current Year 8 allocations are approximately $9.86 million for Eversource and $5.71 million for UI.

Increasing Eversource's allocation to approximately $12.46 million, as contemplated by the proposed 80/20 reallocation, would increase the budget available to Eversource by approximately $2.6 million without a corresponding change in the underlying project compensation obligations that were used to establish the current budget. The Companies do not believe such an increase would be consistent with the cost-control methodology used to establish the existing allocations.

Accordingly, the Companies recommend that PURA maintain the existing EDC-specific budget allocations for Year 8 of the SCEF Program.

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.*

EDC Response:

The Companies support maintaining the existing Bid Preferences for Program Year 8, including the 40% Bid Preference for solar canopy projects and the 20% Bid preference for projects located on landfills or brownfields.

The EDCs believe the existing Bid Preferences appropriately balance the policy objectives of encouraging development on preferred sites with the need to maintain cost-effectiveness and competitive procurement outcomes. The results of recent SCEF procurements provide evidence that the existing Bid Preferences are effective in encouraging participation in these project types.

In particular, the 40% Bid Preference for solar canopy projects has demonstrated meaningful results. During Program Years 6 and 7, eight solar canopy projects submitted Bids, with six ultimately selected. This level of participation and selection indicates that the existing Bid Preference provides a meaningful incentive for canopy development without requiring an additional increase in the Bid preference.

While participation in landfill and brownfield projects has been more limited, the Companies do not believe that the Year 7 results provide sufficient evidence to conclude that the existing 20% Bid Preference is inadequate. Therefore, the Companies recommend maintaining the existing Bid Preference for Year 8.

Accordingly, the Companies recommend that PURA maintain the existing 40% solar canopy and 20% landfill/brownfield Bid Preferences for Program Year 8, without adding additional preference categories.

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.

EDC Response:

The Companies do not recommend any substantive programmatic changes for Program Year 8. Given the maturity of the SCEF Program and its final Program year, the Companies believe the existing Program framework should be maintained.

This position is demonstrated by the limited redlines proposed by the Companies in their August 31, 2026 filing of suggested changes to the SCEF Program documents. The proposed revisions were limited to addressing instances of inconsistency and ambiguity in the existing Program documents and were not intended to modify the underlying Program structure or requirements.

Accordingly, the Companies recommend that the Authority maintain the existing SCEF Program framework for Year 8, with only those limited clarifications necessary to improve consistency and eliminate ambiguity.

III. CONCLUSION

The Companies appreciate this opportunity to provide these further comments and responses to the Authority's questions. The Companies look forward to further discussing these issues with the Authority during the course of this proceeding.

Respectfully submitted,

EVERSOURCE

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CERTIFICATION

This is to certify that on this day, the foregoing document was filed with the Public Utilities Regulatory Authority, and copies of the foregoing document were 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: *Alex E. Soter*
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Commissioner of the Superior Court