CAE-002

The United Illuminating Company **Witness: Katerina T. Miller**
John King

Docket No. 26-08-04 **Page 1 of 1**

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CAE-002 Q:

Motion No. 6, May 15, 2026, Docket No. 25-08-04, Att. B; Motion No. 7, June 18, 2026, Docket No. 25-08-04, Att. B. Based on the EDCs' experience with SCEF Program projects currently in service, state whether actual annual production has differed materially from the production originally estimated by the EDCs. If so, quantify the differences, identify the factors contributing to those differences (if known), and explain whether the EDCs recommend any changes to the methodology for calculating expected annual production. In particular, explain whether any changes are warranted in light of the SCEF Program's use of a budgetary cap.

CAE-002 A:

Based on The United Illuminating Company's ("UI") experience with administering the Shared Clean Energy Facility ("SCEF") Program projects currently in service, UI has not observed material differences between actual annual production and the production estimates originally utilized for Program administration purposes. However, given the relatively limited number of SCEF projects currently in-service and the limited operating history for those projects, UI believes it would be premature to draw definitive conclusions regarding whether actual production may vary significantly from estimated production over a longer period of time.

To the extent differences occur at the individual project level, such differences may be attributable to factors including weather conditions, solar irradiance, equipment performance, outages, maintenance activities, degradation, shading conditions, and other project-specific operating characteristics. Because these factors are not known with certainty at the time of Bid submission, some variation between projected and actual production is expected.

Accordingly, UI does not recommend modifications to the methodology used to calculate expected annual production. The existing approach continues to provide a reasonable estimate of anticipated facility output and has functioned effectively for Program administration purposes.

UI likewise does not believe that modifications are warranted based on the Program's budgetary cap. Because only a limited number of SCEF projects are currently in service, the Company has a relatively small population of operational data from which to evaluate the long-term accuracy of the current methodology. Accordingly, UI believes it would be premature to revise the methodology or conclude that changes are necessary to absent a more substantial operating history. As additional projects achieve commercial operation and sufficient performance data becomes available, the EDCs will be in a better position to assess whether any modifications are warranted.