September 1, 2026

Mr. Jeffrey R. Gaudiosi, Esq.
Executive Secretary
Public Utilities Regulatory Authority
10 Franklin Square
New Britain, CT 06051

Re: Docket No. 26-08-04, Annual Review of Statewide Shared Clean Energy Facility Program Requirements – Year 8

Dear Mr. Gaudiosi:

The Bureau of Energy and Technology Policy (BETP) of the Department of Energy and Environmental Protection (DEEP) hereby submits the recommended Procurement Price Cap, Bid Preferences, and Appendix B for the eighth program year (Year 8) of the Statewide Shared Clean Energy Facility (SCEF) program. Pursuant to Order No. 15, DEEP is required to submit its recommended Procurement Price Cap, Bid Preferences, and changes to Appendix B to the Public Utilities Regulatory Authority (PURA) by September 1, 2026.[1]

Public Process

On June 24, 2026, DEEP issued a Notice of Public Meeting and Request for Written Comments (Notice), which included DEEP's draft recommendations to PURA for Year 8 of the SCEF program.[2] DEEP held a public meeting virtually on Zoom on July 8, 2026, to present the draft recommendations and receive feedback from stakeholders. Twenty-nine people registered for the meeting.

DEEP accepted written comments on the draft recommendations until July 24, 2026. Three stakeholders submitted written comments:

- Council on Environmental Quality[3]

[1] PURA, Final Decision, Docket No. 25-08-04, Annual Review of Statewide Shared Clean Energy Facility Program Requirements – Year 7 (Dec. 17, 2025).
[2] DEEP, Notice of Public Meeting and Opportunity for Written Comments, Public Act 18-50, Section 7(a)(1)(C), Statewide Shared Clean Energy Facility Program (Jun. 24, 2026).
[3] Council on Environmental Quality, Comments, Public Act 18-50, Section (a)(1)(C), *Statewide Shared Clean Energy Facility Program* (Jul. 24, 2026). Available at: https://www.dpuc.state.ct.us/DEEPEnergy.nsf/c6c6d525f7cdd1168525797d0047c5bf/044a1924da624da685258e5000472f62/$FILE/Comments-SCEF%20Year%208%20-%20CT%20Council%20on%20Environmental%20Quality%20(CEQ).pdf

- Save the Sound[4]
- Verogy[5]

Procurement Price Cap

Conn. Gen. Stat. § 16-244z(a)(5) prescribes a price cap as the highest selected bid price from the previous SCEF procurement, unless PURA determines there are changed circumstances.[6] DEEP historically recommended price caps that matched the highest selected bid price from the previous year until SCEF Year 7, when DEEP recommended that PURA consider the changed circumstances caused by the loss of the investment tax credit.[7] For the Year 8 SCEF procurement, DEEP recommends that the price cap be the highest selected bid price from the previous SCEF procurement, which would mean a price cap of $182.93/MWh.[8]

DEEP asserts that this recommended price cap accommodates the continued circumstances regarding the federal investment tax credit while maintaining a competitive and cost-effective program, allowing the EDCs to maximize the capacity that can be deployed within the annual SCEF budget. Written Comments from Save the Sound affirm that "the results of the Year 7 solicitation seem to suggest that the recommended price cap is sufficient to encourage robust program participation." [9] Further, this recommended price cap is higher than the electric distribution companies' (EDCs) proposed buy-all price cap for the Large Zero Emission category in the Year 6 Non-Residential Renewable Energy Solutions (NRES) program, which is only $179/MWh.[10]

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[4] Save the Sound, Comments, Public Act 18-50, Section (a)(1)(C), *Statewide Shared Clean Energy Facility Program* (Jul. 24, 2026). Available at: 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

[5] Verogy, Comments, Public Act 18-50, Section (a)(1)(C), *Statewide Shared Clean Energy Facility Program* (Jul. 24, 2026). Available at: https://www.dpuc.state.ct.us/DEEPEnergy.nsf/c6c6d525f7cdd1168525797d0047c5bf/7ee67771749df2cd85258e500046ce49/$FILE/Verogy%20SCEF%20Year%208%20Written%20Comments%202026.07.24_Submitted.pdf

[6] Specifically, Conn. Gen. Stat. Sec. 16-244z (a)(5) states, in pertinent part, "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...."

[7] DEEP, Compliance Order No. 15, Docket No. 25-08-04, Annual Review of Statewide Shared Clean Energy Facility Program Requirements – Year 7 (Sep. 2, 2025).

[8] DEEP notes that United Illuminating is currently accepting bids for Year 7 Round 2. However, given the highest selected bid price in Year 7 Round 1 was only $0.01/MWh lower than the Year 7 Price Cap, DEEP's recommendation will not change as a result of any Year 7 Round 2 selections.
United Illuminating, Motion No. 7, Order Nos. 9 and 10 Attachment B, Docket No. 25-08-04, Annual Review of Statewide Shared Clean Energy Facility Program Requirements – Year 7 (Jun. 18, 2026).

[9] Save the Sound, Comments, Public Act 18-50, Section (a)(1)(C), *Statewide Shared Clean Energy Facility Program* (Jul. 24, 2026).

[10] Eversource Energy and United Illuminating, Motion No. 3, Joint Motion for Review and Approval of Order No. 3, Docket No. 26-08-03 Annual Non-Residential Renewable Energy Solutions Program Review – Year 6, (Jul. 20, 2026).

Though it is not DEEP's recommendation at this time, PURA may want to further evaluate whether there are changed circumstances as part of their public process and prior to the Final Decision in this Docket as the impacts of President Trump's Section 232 tariff on polysilicon imports to the United States are better understood.[11] The impacts of the tariff may have varying effects on SCEF project prices, depending on where developers source their materials. In their written comments, submitted before the details of the tariff were finalized, Verogy approximated that the tariff could increase "build cost" by five to seven percent.[12]

Verogy further expressed concern over "unilaterally imposed" interconnection cost increases, stating that the EDCs have required Verogy to:

> *(1) pave any access roads that serve a SCEF (as opposed to constructing a gravel access road); (2) required redundant disconnect switches, poles and other equipment beyond the minimum requirements to serve a SCEF and (3) required that otherwise serviceable interconnection gear be relocated to an area more convenient for the EDC. These requirements, and others, have been imposed by EDCs as a condition to execute an [Interconnection Service Agreement], yet these requirements are not spelled out in EDC technical interconnection standards or other material.*[13]

DEEP believes further investigation into these claims is warranted before relying on them as "changed circumstances" to warrant a higher price cap but wanted to bring the concern to PURA's attention.

Bid Preferences

Brownfields and Landfills

DEEP recommends maintaining the 20% bid preference for projects sited on landfills and on brownfields.

Save the Sound and the Council on Environmental Quality (CEQ) both expressed concern with the small number of bids received in Year 7 on landfills and brownfields. CEQ suggested increasing the cap, while Save the Sound suggests there may be other factors at play and suggests getting further input from the solar industry.[14] [15] DEEP received one written comment

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[11] The President of the United States of America, Adjusting Imports of Polysilicon and its Derivatives Into the United States (Aug. 6, 2026). Available At: https://www.whitehouse.gov/presidential-actions/2026/08/adjusting-imports-of-polysilicon-and-its-derivatives-into-the-united-states/

[12] Verogy, Comments, Public Act 18-50, Section (a)(1)(C), Statewide Shared Clean Energy Facility Program (Jul. 24, 2026).

[13] Verogy, Comments, Public Act 18-50, Section (a)(1)(C), Statewide Shared Clean Energy Facility Program (Jul. 24, 2026).

[14] Save the Sound, Comments, Public Act 18-50, Section (a)(1)(C), *Statewide Shared Clean Energy Facility Program* (Jul. 24, 2026).

[15] Council on Environmental Quality, Comments, Public Act 18-50, Section (a)(1)(C), *Statewide Shared Clean Energy Facility Program* (Jul. 24, 2026).

from the solar industry, in which Verogy states that the 20% bid preference is sufficient but that these projects should be allowed to bid above the price cap like solar canopy projects. DEEP does not recommend allowing brownfield and landfill projects to bid above the price cap as it will reduce the cost effectiveness of the SCEF program.

Solar Canopies

DEEP recommends maintaining the 40% bid preference for solar canopy projects. In Years 6 and 7, eight total solar canopy projects bid into the SCEF program, six of which were selected with the 40% bid preference.[16] [17]

Both Verogy and Save the Sound commented that the 40% bid preference is sufficient to support some solar canopy projects as currently structured.[18] [19] In order to balance the environmental benefits of solar canopies with the ratepayer impact of the SCEF program, and given the relative success of the 40% bid preference, DEEP does not recommend increasing the bid preference for Year 8.

Other Bid Preference Considerations

In DEEP's June 24, 2026 Notice, DEEP contemplated a bid preference for projects that provide additional distribution system benefits. DEEP thanks those who submitted public comments on this concept but does not recommend any additional bid preferences for SCEF Year 8.

Appendix B Submittal

In addition to changes to incorporate the recommendations above, DEEP proposes minimal changes to the Year 8 Appendix B submittal, a redlined version of which is included as Attachment 1. DEEP does not consider any of these changes to place any further burden on Bidders.

Most of the changes to Appendix B simply clarify language, like specifying that when Bidders provide the census tract number they must provide the full 11-digit number and switching Public Act references to the Connecticut General Statute section numbers where they were codified. Of particular note, DEEP confirmed that Appendix B submittals are due to DEEP by the due date **and time** established by the EDCs in the SCEF Request for Proposals for Year 8 and that to ensure bids are considered by DEEP as timely filed, the bid must be received by DEEP prior to the expiration of the bid deadline.

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[16] Eversource, Order No. 11 Compliance Filing, Attachment 1, Docket No. 25-08-04, Annual Review of Statewide Shared Clean Energy Facility Program Requirements – Year 7 (Jun. 16, 2026).
[17] United Illuminating, Order No. 11 Compliance Filing, Attachment 1, Docket No. 25-08-04, Annual Review of Statewide Shared Clean Energy Facility Program Requirements – Year 7 (Aug. 3, 2026).
[18] Verogy, Comments, Public Act 18-50, Section (a)(1)(C), Statewide Shared Clean Energy Facility Program (Jul. 24, 2026).
[19] Save the Sound, Comments, Public Act 18-50, Section (a)(1)(C), *Statewide Shared Clean Energy Facility Program* (Jul. 24, 2026).

DEEP reworded question B5.7 to make it narrower and clearer for Bidders, specifically asking about ridgelines and ridgeline setback areas within one mile of the Project Site and interconnection route, instead of simply asking whether there were any ridgelines or ridgeline setback areas "in proximity," which was overly broad.

DEEP added section B7 regarding the Freedom of Information Act (FOIA) to ask Bidders to state in their Appendix B response whether they are claiming any FOIA exemptions and to confirm they have reviewed and understand the FOIA information in Appendix B. DEEP previously asked for this information to be provided in the body of the Appendix B submission email sent to DEEP but was often following up with Bidders to clarify. This section is not asking Bidders to do anything additional to what has been required in previous SCEF years, it simply streamlines the administrative process for both DEEP and the Bidders.

Finally, DEEP revised the Veracity of Statements Affidavit, Attachment 3 to Appendix B. The new version of the affidavit allows DEEP to verify that the affiant is referring to the individual bid, rather than a batch of bids from the same developer. However, it does not place any additional burden on the bidder or ask them to attest to anything new.

Program Manual

DEEP does not propose any changes to the Year 8 Program Manual.

Thank you for your time and consideration.

Sincerely,

DEPARTMENT OF ENERGY AND ENVIRONMENTAL PROTECTION

Bureau of Energy and Technology Policy

/s/ Victoria Hackett
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CERTIFICATE OF SERVICE

I hereby certify that a copy of the foregoing has been furnished to the service list in compliance with Conn. Agencies Regs. § 16-1-15.

By: */s/ Suzannah K. Nigro*
Suzannah K. Nigro
Commissioner of the Superior Court