STATE OF CONNECTICUT
PUBLIC UTILITIES REGULATORY AUTHORITY

ANNUAL SHARED CLEAN ENERGY FACILITY PROGRAM REVIEW – YEAR 8	:	**DOCKET NO. 26-08-04**
	:	**SEPTEMBER 21, 2026**

RESPONSE OF ALLCO FINANCE LIMITED TO THE DEPARTMENT OF ENERGY AND ENVIRONMENTAL PROTECTION'S SEPTEMBER 18, 2026 LETTER

Allco Finance Limited ("Allco") submits this brief response to the September 18, 2026 letter of the Department of Energy and Environmental Protection ("DEEP") addressing the slope-related discussion in Allco's September 14, 2026 written comments.

DEEP is correct. The Year 7 Request for Proposals approved by the Authority on January 7, 2026 contains no slope restriction, and Allco corrects the sentence at page 5 of its comments stating that "[t]he Year 7 RFP requires that no more than 10% of the project site contain slopes greater than 15%." The slope screen Allco described appeared in the program documents of earlier program years — for example, Section 5.2.16 of the Year 5 RFP provided that "solar photovoltaic Bids are not eligible if the Project Site contains slopes greater than fifteen (15) percent, with the exception of the interconnection route," and required bidders to "attest that no portion of the Project Site is on slopes greater than 15% and that there will be no grading before, during, or after construction to achieve this slope requirement." The Authority eliminated the slope screen in its Year 7 Final Decision, directing the electric distribution companies "to remove all slope-related provisions and requirements from the SCEF Program Manual and Appendix B" and providing that DEEP "shall not evaluate a SCEF project's slope characteristics as part of its Appendix B review." Final Decision, Docket No. 25-08-04, at 15 (Dec. 17, 2025).

The Authority's ruling adopted, and DEEP's letter confirms the implementation of, precisely the outcome Allco's comments urged: slope, soil, and runoff conditions are evaluated site-by-site with engineering controls through DEEP's General Permit for the Discharge of Stormwater and Dewatering Wastewaters from Construction Activities, not through a categorical bidding screen. Allco developed projects under the prior screen, at material engineering expense for site-specific slope analyses, and appreciates both the Authority's elimination of the requirement and DEEP's confirmation that it has not evaluated slope characteristics since the Year 7 Final Decision issued and will not do so in Year 8.

Accordingly, Item E of Section V of Allco's comments is narrowed to a single housekeeping request: that the Year 8 Final Decision confirm that the Year 8 RFP, the SCEF Program Manual, Appendix B, and all bid-eligibility and bid-evaluation criteria — including any site-suitability checklists or portal screens administered by the electric distribution companies — will continue to contain no slope-related eligibility requirement, consistent with the Year 7 Final Decision at page 15. The remaining items of Allco's September 14, 2026 comments are unaffected.

Respectfully submitted,

ALLCO FINANCE LIMITED

/s/ Thomas Melone
Thomas Melone
Juris No. 438879
777 West Putnam Avenue, Suite 300
Greenwich, CT 06830
Phone: (212) 681-1120
Email: Thomas.Melone@AllcoUS.com

CERTIFICATION

This is to certify that on this day, the foregoing document was filed with the Public Utilities Regulatory Authority, and copies 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.

/s/ Thomas Melone
Thomas Melone