Date Filed: August 28, 2026

Witness: RUNYON, JENNIFER M
Request from: Public Utilities Regulatory Authority

Question:

CGB Comments, July 9, 2026, p, 1. If recommending that change orders be permitted to allow projects to increase in size after project approval but before incentive payment when the increase results from circumstances outside the control of the customer or developer, propose an appropriate percentage threshold by which a project's size may increase after project approval but before incentive payment, identify the limited circumstances under which such changes should be allowed, and justify all recommendations provided.

Response:

From an Interconnection perspective, Eversource notes that projects are more regularly downsized as a result of study results, rather than increased. The Eversource Interconnection team cautions that a Material Modification, as defined in the most current Interconnection Guidelines,[1] to an Interconnection Application could result in the loss of queue position and/or require a new Interconnection application be submitted.

From a demand response program perspective, Eversource is agnostic on a threshold by which a project's size may increase after Green Bank project approval but before Green Bank issues an incentive payment. Since the incentive payment in this theoretical situation has not been paid out, there would be no ratepayer impact based on an increase in size since the incentive payment correlates to the system benefits a project provides.

[1] "Connecticut Application to Connect" Interconnection Guidelines are available on the Eversource website at: https://www.eversource.com/residential/about/doing-business-with-us/interconnections/connecticut/connecticut-application-to-connect