CAE-018

The United Illuminating Company **Witness: Logan Taricani**

Docket No. 26-08-05 **Page 1 of 1**

Date Submitted: August 28, 2026

CAE-018 Q:

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.

CAE-018 A:

As stated in Attachment 4[1] from the Program Administrator's ("PA") Standing Order 3 & 8 compliance filing, United Illuminating recommends that projects experiencing a change order outside of the customer's or developer's control that results in an increase in system size after project approval, but prior to incentive payment, be reviewed and approved by the PAs on a case-by-case basis. This approach is consistent with the PAs proposed treatment of both add-on systems and change orders, which recognize that project-specific circumstances may necessitate modifications to system capacity and are best evaluated individually.

Establishing a fixed percentage threshold for allowable system size increases could inadvertently restrict otherwise reasonable project modifications and create unnecessary barriers for customers whose projects are affected by on-site conditions, equipment availability, engineering requirements, or other circumstances beyond their control. The PAs have already acknowledged that certain increases in kW or kWh capacity may be unavoidable and have therefore proposed a flexible review process to determine when a modification remains reasonable.

For these reasons, UI does not recommend a specific percentage cap for project change orders. Instead, maintaining a case-by-case review process provides the flexibility needed to accommodate legitimate project changes while preserving program integrity and ensuring customers are not unfairly disadvantaged by circumstances outside of their control. This approach will support a more consistent customer experience and create alignment across the add-on system and change order processes.

[1] DN 26-08-05 Attachment 4 Narrative of ESS Program Recommendations Pg. 6 *Change Orders*