Company
Docket No. 26-08-05
Response to Interrogatory CAE-18
Date of Submission: August 28th, 2026
Witness: Sergio Carrillo Connecticut Green Bank

Question:

CAE-18 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:

The primary reason the Program Administrators recommendation to allow limited change orders that increase project size after project approval but before incentive payment was to address circumstances in which the final installed capacity differs from the capacity originally approved. An increase in installed capacity could cause the Program Administrators to exceed the applicable maximum tranche capacity authorized by PURA at the time, particularly when a tranche is at or near its approved capacity limit. The proposed flexibility was therefore intended primarily as an administrative mechanism to accommodate legitimate, unavoidable project modifications while maintaining compliance with PURA authorized tranche limits, and not as a means for developers or customers to materially increase project size after securing an initial approval.

The Program Administrators considered several potential thresholds and related circumstances but ultimately determined that retaining Program Administrator discretion was the most appropriate approach due to all of the various scenarios that could occur. This discretion is intended to avoid delaying project completion in situations where a fixed threshold may not adequately account for project-specific circumstances. For example, if a 20% threshold were established and a project exceeded that threshold by a small margin, such as 22%, the Program Administrators would have to wait until the following year to approve a single project after PURA review and approval. The same rationale applies to providing specific examples, as new and unforeseen circumstances arise over time.

The Green Bank generally anticipates that the majority of change orders will result in decreases to system size due to interconnection restrictions rather than an increase. If a percentage threshold is required, then it could be no more than a 50% increase in kW and would recommend no limit on kWh. The Green Bank would like the discretion to make reasonable adjustments, if the incentive Tranche and Step is not full and will not

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make any adjustments if there is not enough room in the Tranche and Step. As attrition rates continue, there will be more room overtime.