SIERRA CLUB

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July 31, 2025

Public Utility Regulatory Authority
10 Franklin Square
New Britain, CT 06051

RE: DOCKET NO. 25-02-14 - RENEWABLE ENERGY TARIFF PROGRAM SUCCESSOR STUDY

Dear PURA Commissioners,

On behalf of Sierra Club and our 30,000 members and supporters in Connecticut, thank you for the opportunity to provide the following comments in response to PURA's Notice of Request for Written Comments in Docket 25-02-14 issued on July 14, 2025.

Connecticut state statute mandates that electricity supply must be 100% zero-carbon by 2040[1], and that greenhouse gas emissions be reduced to 45% below 2001 levels by 2030, 65% by 2040 and 80% by 2050. It also requires that, by 2050, the state be at an economy-wide net-zero level.[2] Meeting these goals will provide many benefits to Connecticut residents including mitigating the impacts of climate change, reducing health harming air pollution, and putting Connecticut on a pathway to lower cost renewable energy.

These goals can only be met if Connecticut makes the necessary transition to renewable energy sources like wind and solar. Recent actions by Congress to end clean energy tax incentives, and actions by the Trump Administration to block clean energy, put Connecticut's continued progress at risk. It is imperative that PURA chart a course for the future of solar in this docket, in recognition of the important role that solar will play to keep Connecticut on track to meet our goals.

1. Residential Renewable Energy Program

Sierra Club does not support PURA's proposed program design. Sierra Club recommends that PURA maintain the RRES program as it is and consider targets and adders to make improvements.

The current RRES program has proven successful. Residential installations make up over half of Connecticut's total solar deployment. PURA's 2024 Clean & Renewable Energy Report [3] shows that cumulative residential solar installations reached 764 MW by September 2024. This figure includes the current residential solar program (RRES) and the previous program (RSIP). The current RRES program has a goal of 50 - 60 MW per year which has been easily exceeded with an average annual deployment of about 96 MW per year between 2022 and 2024. Keeping the RRES program as is - with

[1] https://cga.ct.gov/2022/ACT/PA/PDF/2022PA-00005-R00SB-00010-PA.PDF
[2] https://cga.ct.gov/2025/ACT/PA/PDF/2025PA-00125-R00HB-05004-PA.PDF
[3] 2024 Clean & Renewable Energy Report, February 19, 2025, CT Public Utilities Regulatory Authority

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monthly netting and flat volumetric rates - will ensure compensation rates that continue to attract new customers, and will provide continuity and stability. This is especially important given the changes at the federal level and other pressures on solar such as tariffs.

Keeping the current program also ensures a pathway for multi-family homes to participate. Sierra Club is concerned that PURA's suggested program design change would negatively affect multi-family housing. Multi-family must opt for buy all, and its elimination in this program design shows no clear way for multi-family buildings to continue to be eligible.

Residential solar has achieved notable benefits to all customers. During the heat wave in June 2025, an Acadia Center analysis[4] shows that behind-the-meter solar made New England's power grid more reliable and more affordable for consumers during the June 24th peak event. The Acadia Center analysis shows that as real-time wholesale electricity prices soared above $1,000 per MWh in the evening, behind-themeter (BTM) solar saved consumers ***at least*** $8.2 million (and up to $19.4 million) in costs on one of the most expensive days of the year for the grid.

And in the winter, solar is contributing to meeting the region's winter electricity needs. Because New England is overreliant on gas for heating and energy generation, the solar generated by residential solar arrays eases the demand for fossil fuels during the day. This makes the grid more reliable and has also led to the closure of an expensive generator, Mystic, saving the region from a multi-million dollar monthly subsidy.

While Sierra Club recommends maintaining RRES, there are areas where the program could improve, and Sierra Club recommends the following:

- Targets: Analysis by the Connecticut Green Bank in 2016 shows potential for between 3,800 and 6,500 MW of residential rooftop solar. As noted in our previous comments, Sierra Club recommends setting more robust targets that will help us reach a minimum of 3,800 MW of residential rooftop solar by 2040. A target of 200 MW per year, double the current experience, would add another 1,000 MW by 2030, and reach the 3,800 MW target by 2040 when Connecticut must achieve 100% zero-carbon electricity. We recommend retaining the goal of 40% of program benefits extending to low-income residents. We also recommend ensuring deployment across single-family, multi-family 2-4 units, and multi-family 5+ units, at a minimum, matching the percentage of each type of housing.
- Time Of Use (TOU) adder- Sierra Club recommends that TOU rates be optional and that PURA consider adders to achieve goals related to TOU.
- Battery adder - The Acadia Center analysis of the June 2025 heat wave noted that system data showed clear evidence for the benefits of deploying battery energy storage across the region to even better align periods of solar output with peaks in demand and wholesale prices. We

[4] https://acadiacenter.org/wp-content/uploads/2025/07/Fact-Sheet-June-30-2025-Grid-Action-Report-June-Heat-Wave.pdf

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recommend PURA consider an adder that would lead to battery deployment - including EV batteries for vehicle to grid - during early evening peak.
- Interconnection - there continues to be interconnection issues, and with increased demand for solar before the federal tax incentives run out, it is critical to address them.

2. Non-Residential Renewable Energy Program

Sierra Club supports PURA's proposed program design for NRES, but recommends that SCEF, School Solar, State Projects and Community Solar opportunities be explicitly offered.

Demand for the nonresidential program has been high with all categories receiving more bids than the available MW capacity last year. Sierra Club supports PURA's proposed feed-in tariff and the first-ready selection process. The proposed feed-in tariff is the most widely adopted program structure globally, and has been used successfully. Several states, including California and Vermont, also use a feed-in tariff for nonresidential solar. PURA's proposal for a first-ready selection process - putting projects that have all completed to be the first approved.

Sierra Club seeks for a variety of other nonresidential solar types to be explicitly offered - either as part of NRES or as its own program. These include SCEF, School Solar, State Solar Projects, and Community Solar. None of these are mentioned in the program design, though could be part of it.

Specific to Community Solar, Connecticut lacks a Community Solar program that would allow anyone to subscribe to a community solar array and receive bill credits. We urge the creation of a Community Solar program.

As with residential solar, interconnection issues for NRES exist that must be addressed.

We continue to recommend removing non-renewables including fuel cells from participating in NRES, SCEF and any newly created program.

Thank you for your consideration of our comments.

Sincerely,

Samantha Dynowski, State Director
Sierra Club Connecticut Chapter