Connecticut Chapter
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September 10, 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 August 26, 2025.

1. Economic Modeling of Tariff Design

Relative to economic/financial modeling, Sierra Club recommends that as tariffs are designed that PURA:

- Include modeling on tariff structures that will attract consumers to install solar at a pace that will ensure Connecticut is on track to achieve state mandates for 100% zero-carbon electricity supply by 2040, Renewable Portfolio Standard (RPS), and the Global Warming Solutions Act.
- Include modeling on the benefits of solar that includes both direct benefits to the solar customer and benefits to all customers. Benefits to all customers include: the lower cost of solar generation, the cost savings of avoided generation, the cost savings of avoided peaks, the societal benefits of less pollution and climate disruption, and the ability to meet state requirements include Connecticut's 100% zero-carbon electricity supply by 2040 mandate, Renewable Portfolio Standard (RPS), and the Global Warming Solutions Act requirements.
- Include battery storage options that combine solar and storage and provide a framework for deploying battery to shave peaks.

2. Residential Underserved Customer Program Design

The low-income discount rate and the residential solar program may have overlapping customers, but Sierra Club does not recommend lowering compensation for the solar generated by systems owned by customers participating in the low-income discount rate. Compensation for power generation should be established separately.

Sierra Club recommends that Multi-family Affordable Housing remain in the residential category. Tenants in multi-family affordable housing face barriers to access solar and storage energy technologies. Moving multi-family affordable housing from non-residential to residential was recently established through Public Act 21-48. As noted in previous comments, Connecticut's residential solar program has been very successful, exceeding its goals and delivering solar to home owners who want to participate.

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Previous to Public Act 21-48, tenants in multi-family affordable housing have not been able to participate in the residential program. Instead, they were required to compete against projects in the non-residential program serving non-residential customers like schools, houses of worship, and commercial buildings. The MW caps of the non-residential program put tenants in multi-family affordable housing in a competition that residential customers do not enter, thus creating further inequity in access between residential tenants and residential home owners.

Non-Residential Paired Storage
Sierra Club recommends that PURA develop a program for nonresidential projects paired with energy storage. Non-residential solar paired with storage could be a tremendous and beneficial resource for our state. The benefits are varied: storage could provide community resilience, protect critical infrastructure, avoid peaker usage, lower peak, lower costs, help meet the Connecticut's 100% zero-carbon electricity supply mandate, help meet the RPS requirements, help meet the required greenhouse gas emission reductions of the Global Warming Solutions Act, etc.

As noted in previous comments, 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 recommend PURA consider adders for battery storage in non-residential applications. Adders should encourage projects that would provide benefits to Connecticut residents and communities, and that would lead to battery deployment at the most beneficial times.

4. Community Solar
Connecticut lags behind other states in our region in deploying solar. At the close of 2024, Connecticut produced 4.11% of its electricity from solar, with 1,666 MW installed.[1] Among the states in the ISO-New England region, Connecticut was second to last (ahead only of New Hampshire) in the percentage of electricity from solar and the total solar MW capacity deployed per 100,000 persons.[2]

Sierra Club Connecticut recommends that our current SCEF program, eligible only to low-income residential customers or those who cannot put on solar, should be continued and further supplemented by the creation of a community solar program.

State's community solar programs are routinely assessed by various entities. A small selection includes:

- Institute for Local Self-Reliance (ILSR) top states for community solar (July 2025)[3]: New York, Maine, Minnesota, Massachusetts and Illinois
- NREL (December 2024)[4]: About 75% of the total market is concentrated in the top four states: Florida (3,873 MW-AC), New York (2,110 MW-AC), Massachusetts (1,049 MW-AC), and Minnesota (939 MW-AC).

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[1] State Solar Map, Solar Energy Industry Association
[2] 2024 Clean & Renewable Energy Report, February 19, 2025, CT Public Utilities Regulatory Authority, page 41
[3] https://pv-magazine-usa.com/2025/06/11/community-solar-tracker-reveals-the-need-for-supportive-state-policy/
[4] https://www.nrel.gov/state-local-tribal/community-solar

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- Energy Sage Top Community Solar States(December 2023)[5]: New York, Minnesota, and Massachusetts

ILSR states that "a model community solar policy has no cap, has a fair compensation rate, simplifies the billing process for subscribers, meaningfully accounts for the challenge of reaching low- and moderate-income (LMI) subscribers, and rewards other beneficial development or small subscriber-friendly practices."

New York and Massachusetts come up in each of the assessments noted above, and the program structure in these states should be considered for Connecticut.

Thank you for your consideration of our comments.

Sincerely,

Samantha Dynowski, State Director
Sierra Club Connecticut Chapter

[5] https://www.energysage.com/community-solar/comparing-top-community-solar-states/