



**TESTIMONY
OF
EVERSOURCE ENERGY
Andrew C. Belden
before the Energy & Technology Committee
March 5, 2026**

Re: **H.B. No. 5340, An Act Concerning Renewable Power Generation.**

Eversource submits this testimony on House Bill (“H.B.”) No. 5340. This testimony is sponsored by Andrew C. Belden, Vice President of Renewable Programs and Strategy.

1. Background on Eversource.

Eversource delivers electricity, natural gas and water to approximately 1.8 million Connecticut customers. We directly employ approximately 4,000 employees in Connecticut with approximately 40 percent of that workforce covered by collective bargaining agreements. Our investment in infrastructure and other programs that we administer generates local jobs for contractors and substantial municipal, gross earnings and sales taxes for the State and its municipalities. We aspire to be an important partner in enabling Connecticut to achieve its clean energy goals and will move forward enthusiastically to engage in those efforts where there is a reasonable and balanced regulatory environment to support such investment.

2. Comments on H.B. No. 5340.

H.B. 5340: (1) requires PURA to develop successor programs for the RRES, NRES and SCEF programs, (2) orders a study of consumer protections for solar photovoltaic system leasing and sales, (3) allows the use of portable solar photovoltaic systems, (4) requires the Commissioner of DEEP to implement an agrivoltaics program, and (5) directs the Commissioner of DEEP to establish a pilot program concerning the installation of solar photovoltaic systems in environmental justice communities.

a. Section 6 concerning a proposed agrivoltaics program

Section 6 of the Bill proposes to establish an agrivoltaics program to incent the development of solar photovoltaic systems located on land used for farming or agricultural operations. The Company has two comments on this initiative.

First, at a time when the Legislature, businesses and ratepayers are intently focused on the affordability of electric utility bills, Section 6 of the Bill does not appear to impose any caps or guardrails on the cost of the agrivoltaics program. The Company therefore recommends that the Bill be updated to include a limit on the aggregate procurement of energy products from agrivoltaics at amount at least less than the \$16 million annual limit for Shared Clean Energy Facilities included in Section 3(f), or to fund this program through state bonding or taxpayer dollars.

Second, the cost recovery language for this program in Lines 462-466 is inconsistent with the cost recovery language for the RRES, NRES and SCEF programs in Lines 109-116,219-226 and 311-

318 of the Bill. For these reasons, Eversource proposes that the cost recovery language in Lines 462-466 be amended so they are consistent with the other cost recovery text in this Bill:

Lines 462-466: “The proposed tariff shall provide that the electric distribution companies shall be entitled to recover all reasonable costs and expenses prudently incurred for the implementation and operation of the program on a timely basis through a nonbypassable fully reconciling component of electric rates, as determined by the authority.”

b. Section 5 concerning portable solar generators

Eversource has engaged with stakeholders on the topic of portable solar generators and provided feedback related to several practical considerations that would provide appropriate consumer protections for customers purchasing the devices. Importantly, portable solar generators may feed electricity onto the grid during normal operations unless equipped with advanced features that prevent them from producing more electricity than can be consumed onsite. Under a scenario where excess generation is exported to the grid, typical utility metering devices will not recognize the excess generation and may register excess export as customer energy consumption. This is a standard anti-tampering feature of most residential utility meters. A 1.2kW solar device may significantly over-generate during daytime hours during the spring and fall if installed at an apartment or even a smaller single-family home. Without installation of a utility meter that recognizes this excess generation, and an appropriate PURA approved excess generation compensation tariff, the economic benefits of portable solar devices may be limited or even negative. Consumer protection requirements that ensure that customers purchasing portable solar devices understand these considerations will be important to ensuring customers are making informed purchasing decisions. Notably, deployment of Advanced Metering Infrastructure could facilitate the portable solar generator market by providing future pathways to recognize exported solar power without the need to install new utility meters.

c. Sections 1-3 on the RRES, NRES and SCEF successor programs

Eversource supports the continuation of clean energy programs following the current end dates of the RRES, NRES and SCEF programs contained in C.G.S. 16-244z. However, the Company is also mindful that the total cost of clean energy programs has grown as more customers have taken advantage of them, and those costs ultimately impact the affordability of electric utility service to Connecticut customers. The total annual costs recovered through Eversource’s Rate Adjustment Mechanism (“RAM”) associated with compensating Eversource distributed energy customers through existing tariffs and incentive programs have grown from less than \$10M in 2015 to nearly \$180M in 2025. Existing distributed generation may already add at least \$2 billion to Eversource customer energy costs in the public benefits charge in the next 10 years through the RAM and successor programs could substantially add to this burden. Eversource consequently recommends the General Assembly seek to minimize or mitigate the costs of successor clean energy programs through revisions to HB 5340 that would further control costs and promote competition.

HB 5340 relies entirely on the determinations of PURA to set rates for distributed generation tariffs that will significantly impact the future trajectory of electric utility costs for Connecticut customers. Sec. 1(b)-(c) and Sec. 2(b) of HB 5340 directs PURA to establish rates for renewable

energy projects based upon its consideration of the average cost of installation of a distributed energy resource, several potentially subjective factors and the results of a study of the value of distributed energy resources that will be 8 years old by the time new tariffs take effect. Eversource supports PURA maintaining a central role in the design and oversight of successor clean energy programs, but recommends that HB 5340 be updated with further direction from the General Assembly to PURA that compensation rates should decline and that competitive processes should be utilized to establish prices for the largest clean energy resources.

i. Section 1 on the RRES successor program

Existing net metering and RRES tariffs have historically permitted residential customers to fully offset consumption of energy from the electrical power system with excess energy produced at different times, as well as compensated customers for any remaining net excess distributed generation at the full amount of all per-kilowatt-hour retail charges. These tariff design features have been a major contributor to the growth of clean energy program costs in Connecticut and HB 5340 includes no requirement for PURA to adjust them in future tariffs. Eversource recommends that the General Assembly ensure that the costs of successor residential tariffs will decline by:

1. Removing Sec. 1(b)(3), which directs PURA to establish the period of time that will be used for calculating the net amount of energy produced by a distributed energy resource, as well as delete all references to “the period of time established by the authority” in Sec. 1(d); and
2. Further directing in Sec. 1(b)(2) that the rate for such [successor program] tariffs shall be an amount materially less than the total of all cents-per-kilowatt-hour charges applicable to a customer’s rate class. Eversource recommends such a rate be equal to the applicable cost of Standard Service provided by the utility.

These changes will ensure that future distributed generation customers will remain responsible for the cost of all energy they continue to consume from the electric power system and that the growth of renewable energy program costs will slow under successor programs.

ii. Section 2 on the NRES successor program

The direction in HB 5340 for PURA to establish rates for Non-Residential projects varies considerably from the price setting process within the current NRES and SCEF programs, as well as the prior LREC/ZREC program. The direction in Sec. 2(c) of HB 5340 for PURA to develop and implement an application process for successor commercial program tariffs is also a departure from prior commercial clean energy programs. Connecticut's clean energy programs have historically selected projects and established rates through competitive solicitations conducted pursuant to electric distribution company procurement plans approved by PURA. This transparent approach has resulted in Connecticut realizing significantly lower costs for clean energy resources as compared to other New England states. Eversource cautions that the proposed departure from competitive solicitations in favor of a “walk-up” program in which projects are compensated at pre-determined rates set by PURA risks increasing the costs of clean energy in Connecticut.

It will likely be difficult for PURA to obtain objective cost information on which to base rates. PURA will likely have to rely on self-reported, un-audited cost data from unregulated solar installers that will directly benefit from PURA's approval of higher rates. PURA will similarly have to develop its own assumptions about the cost of financing and operating renewable energy projects. This approach to renewable energy pricing has been utilized in the most recent iteration of the Massachusetts Solar Renewable Target Program and resulted in the Massachusetts Department of Energy Resources setting compensation rates for solar energy projects that are as much as double what similar projects have recently bid into competitive solicitations of Connecticut's NRES and SCEF programs.

Eversource recognizes there are concerns that competitive solicitations can result in speculative bidding and higher attrition of clean energy project proposals, but there is mixed evidence in support of these claims. Eversource recently noted in comments provided to PURA in Docket No. 25-02-14 that the availability of pre-determined compensation rates to applicants in Massachusetts has not resulted in significantly higher deployment of projects in recent years as compared to the NRES and SCEF programs. Massachusetts utility customers are incurring much higher costs for clean energy projects that reach commercial operation but not necessarily supporting the successful deployment of more renewable energy resources as a result.

Eversource recommends modifying Sec. 2(c) of HB 5340 to remove the direction for PURA to develop and implement an application process and replace it with direction for PURA to establish a procurement plan for each EDC similar to what is included in C.G.S. 16-244Z(a)(1)(A). Eversource similarly recommends that Sec. 2(b) be modified to direct that the rates for successor program tariffs be based upon the results of competitive solicitations conducted pursuant to procurement plans established by PURA. These changes will ensure that Connecticut continues to benefit from the lowest cost commercial clean energy resources available.