

Connecticut Residential Renewable Energy Solutions Program – What Every Installer Needs to Know

Annual RRES Program Review – Contractor Education and Enforcement

January 30, 2025 Hosted by SEIA Docket No. 2x-08-02RE01



Jamie Spannhake, EOE Staff Attorney

- Overview of Annual Docket: XX-08-02RE01
 - Known as the Contractor Enforcement Docket
- Compliance Filing Requirements: What, Where, & How
- Common Errors to Avoid
- Disciplinary Framework
- Q&A

Contact: Jamie.Spannhake@ct.gov

Overview of Annual Contractor Enforcement Docket

The Contractor Enforcement Docket arose from **Docket No. 23-08-02**, Annual Residential Renewable Energy Solutions Program Review – Year 3. The compliance filing requirements and reasons for them are provided in the **Final Decision** dated Nov. 3, 2023, in Section IV.D. (pages 22-28) and **Orders No. 33 and No. 34**.

Why the Contractor Enforcement Docket?

- (1) Improve customer protections and disclosures so that customers make informed decisions based on accurate information.
- (2) To determine whether and how much participants financially benefit from RRES program participation.
- (3) Address any complaints brought to the Authority's attention during the previous calendar year regarding the RRES Program.
- (4) Enable EOE to conduct a review of marketing and training materials from RRES contractors.

Who must comply? Solar Contractors, including Installers, Sales Companies, and Developers

Annual Compliance Filing Requirements

WHEN TO FILE

• By April 1 annually*

WHERE TO FILE: in the annual Contractor Enforcement Docket

- 23-08-02RE01 for materials used & projects completed in 2023, were due in June 2024
- 24-08-02RE01 for materials used & projects completed in 2024, are due April 1, 2025
- 25-08-02RE01 for materials used & projects completed in 2025, will be due April 1, 2026
- And so on: XX-08-02RE01

WHAT TO FILE

- Marketing and Training documents <u>as compliance</u>
- Financial Benefits documents as compliance
- Motions for Protective Order (if needed) as a motion
- * 2023 documents were not due until June 1, 2024, because it was the first year; all future years, filings are due by April 1.

Compliance Filing Requirements: What to File - Overview

Marketing and Training Materials (Order No. 33)1. Marketing Materials2. Training Materials

Financial Benefits Documents (Order No. 34)

- 1. Customer Disclosure Forms
- 2. Financial Benefits Summary Sheet

(an unlocked EXCEL file with 8 columns of specific information)

3. Financial Benefits Sheet Narrative (a Word document or PDF)

AND A COVER LETTER – PLEASE!

Marketing & Training Materials (Order No. 33) **TWO CATEGORIES OF FILINGS:**

- 1. All marketing materials used for solar projects in the past calendar year, such as brochures, advertisements, social media posts and ads, flyers, etc. This includes marketing scripts.
- 2. Training materials used to train anyone who engages with a customer or potential customer and on a topic relevant to sales, marketing, and other customer facing topics.

WHAT IF you don't have marketing and/or training materials? Include this information in your COVER LETTER stating you do not have materials responsive to the requirement.

Any questions about Marketing & Training Materials?

Financial Benefits Documents (Order No. 34) 3 categories of documents...

FIRST Financial Benefits Document:

Customer Disclosure Forms for all projects completed, i.e. received PTO, in the past calendar year. So, for compliance filings in April 2025, that will be all projects completed in calendar year 2024.

- PURA ruled in Dkt No. 23-08-02RE01 that you can publicly file EITHER redacted completed customer disclosure forms OR blank forms of every version of customer disclosure form you utilized.
- We will discuss confidentiality and redactions later in this presentation.

Financial Benefits Documents (Order No. 34) 3 categories of documents...

SECOND Financial Benefits Document:

Financial Benefits Summary Sheet (the Summary) for all projects completed in the prior calendar year as an unlocked Excel file with 8 columns of information:

- 1. site address;
- 2. utility account number associated with the project;
- 3. annual contract rate increase amount;
- 4. estimated year one production (kWh) as a percentage of estimated annual utility customer usage (kWh);
- 5. estimated year one customer net savings;
- 6. starting utility rate used to estimate net year one savings;
- 7. estimated net savings over the RRES tariff term (i.e., 20 years); and
- 8. utility rate used to estimate net savings over the RRES tariff term (i.e., 20 years).

We will discuss confidentiality and redactions later in this presentation.

Financial Benefits Documents (Order No. 34) 3 categories of documents... **THIRD Financial Benefits Document:**

Financial Benefits Sheet Narrative (the Narrative) is a narrative explanation of any calculation methodologies included in the Financial Benefits <u>Summary</u> Sheet.

- may be a simple summary document (e.g., as brief as a couple of pages)
- outlining the methodology used to calculate the info in the Financial Benefits Summary Sheet
- along with a general list of the documents needed for such calculations (e.g., a customer's electric bill and sales contract are needed to verify the methodology for the fourth requirement, etc.).

PURA ruled that this document is not confidential.

Any questions about the Financial Benefits

Documents?

Customer Disclosure Forms
Financial Benefits Summary Sheet (the Summary)
Financial Benefits Sheet Narrative (the Narrative)

Confidentiality and Document Redactions

- Confidentiality determinations are based on the Freedom of Information Act (FOIA), with a presumption of public filing.
- When you believe information should be kept confidential, i.e. not filed publicly in the docket, you must:
 - Redact (black out) only the confidential info in the document
 - File the **redacted** document publicly in the docket **as compliance**
 - Submit the <u>unredacted</u> document to PURA's Executive Secretary Jeff Gaudiosi via email to <u>PURA.ExecutiveSecretary@ct.gov</u>
 - contemporaneously with the motion for protective order
 - The email's subject line AND each page of the documents must state in all capital letters "CONFIDENTIAL MATERIAL - NOT FOR PUBLIC DISCLOSURE."
 - File a Motion for Protective Order publicly in the docket as a motion

Motions for Protective Order

File a Motion for Protective Order publicly in the docket as a motion

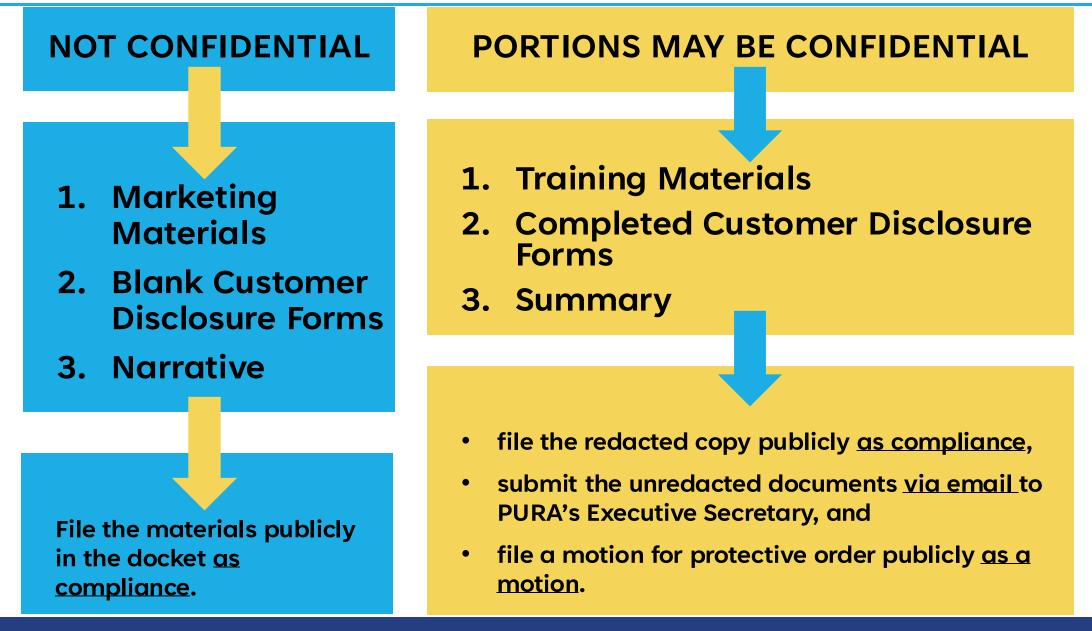
- must provide specific legal arguments with reference to state or federal law
- with supporting facts showing why the information should be kept confidential
- with a certified affidavit
 - You can find examples of proper motions and affidavits in Docket No. 23-08-02RE01.



For Docket No. 24-08-02RE01, PURA has stated that if you properly file a motion and redact only the information as stated in the Notice dated Aug. 28, 2024 (in Docket No. 23-08-02RE01), you can assume your motion is granted unless you hear otherwise. Docket No. 24-08-02RE01 Notice of Proceeding, Oct. 1, 2024.



PURA Rulings on Confidentiality in Docket No. 23-08-02RE01, Docket Notice, Aug. 28, 2024



Guidance re Confidentiality

YOU HAVE TWO OPTIONS FOR FILING CUSTOMER DISCLOSURE FORMS and both require that you submit unredacted customer disclosure forms via email to PURA's Executive Secretary.



Blank Customer Disclosure Forms are not confidential. There should be no redactions (black outs) of any portion of a blank customer disclosure form.

If you file blank customer disclosure forms publicly <u>as</u> <u>compliance</u>, you still need to submit the completed unredacted customer disclosure forms via email to PURA's Executive Secretary. Completed Customer Disclosure Forms may contain some confidential info. PURA has ruled that you <u>cannot</u> redact system size and production information. PURA also ruled that you <u>can redact</u>:

- customer names, addresses, phone numbers, email, and account numbers.
- a specific project's purchase price, lease rate, down payment amount, estimated payments, net savings, and utility and escalator rates.

If you file redacted Customer Disclosure Forms, then you need to:

- file the <u>redacted</u> documents publicly as compliance,
- submit the <u>unredacted</u> documents via email to PURA's Executive Secretary, and
- file a motion for protective order publicly as a motion.

Guidance re Confidentiality

For Financial Benefits Summary and Narrative (Order No. 34)

The Narrative is not confidential. There should be no redactions (black outs) of any portion of the Financial Benefits Sheet Narrative (the Narrative).

Because the Narrative is not confidential, you only need to file the document publicly in the docket <u>as</u> compliance. **The Summary contains some info that may be confidential and some that is not confidential.** PURA ruled that you <u>cannot redact system size and</u> **production information**. PURA also ruled that the following info <u>can be</u> redacted from the Financial Benefits Summary Sheet:

- customer names, addresses, phone numbers, email, and account numbers.
- a specific project's purchase price, lease rate, down payment amount, estimated payments, net savings, and utility and escalator rates

In other words, you <u>may redact only columns 1-3 and 5-6 of the</u> Summary. You are not required to redact any information, but you may.

If your Summary contain redactions (black outs), then you need to:

- file the <u>redacted</u> copy publicly as compliance,
- submit the <u>unredacted</u> document via email to PURA's Executive Secretary, and
- file a motion for protective order publicly as a motion.

Guidance re Confidentiality

For Marketing & Training (Order No. 33)

Relevant sources:

- Docket Notice, Aug. 28, 2024
- Decision on Motion Nos. 31 and 32, Sept. 24, 2024



Marketing Materials are not confidential. There should be no redactions (black outs) of any portion of marketing materials.

Because Marketing Materials are not confidential, you only need to file the materials publicly in the docket <u>as</u> compliance. Training Materials generally are not confidential; however, on a case-by-case basis:

proprietary or trade secret information that is wholly internal to the company and will not in any way be shared with the public or the customer <u>may</u> be confidential.

e.g. regarding internal proprietary software or internal business planning

If Training Materials contain redactions (black outs), then you need to:

- file the redacted copy publicly as compliance,
- submit the unredacted documents via email to PURA's Executive Secretary, and
- file a motion for protective order publicly as a motion.

Any questions about what can and cannot be redacted?

GETTING READY TO FILE

Gather your documents:

- Cover letter (doc or PDF)
- Marketing materials (PDF)
- Training materials (PDF)
- Customer disclosure forms (PDF)
- Financial Benefits Summary (Excel)
- Financial Benefits Narrative (doc or PDF)
- Motions for Protective Order (doc or PDF)
 - With affidavit

Create your PURA filing account if you haven't already

- Visit: <u>https://portal.ct.gov/pura</u>
- Click on "Make A Filing"
- On the <u>Make An Electronic Filing</u> page: scroll down to the instructions for How to Register with the PURA Website.



Department of Energy and Environmental Protection Public Utilities Regulatory Authority

New Standard Service Rates for Eversource and United Illuminating (UI) customers, covering the period from January through June 2025, have been announced. Customers are encouraged to check the rate board for up-to-date supply rate options at Energize CT

CT.gov Home / Public Utilities Regulatory Authority

Regulated Industries	>	Most Popular	
Public Participation	>	Docket Information	>
News	>	Search for Docket By Number	>
About PURA	>	Make A Filing	>
Contact Us	>	Make A Filing Forms	>
Search Public Utilities Regulatory Authority		Calendar of Events	>
Authority (A/About/Filing-and-Forms/Make-An-Electronic-Filing	ρ	PURA Notices	>

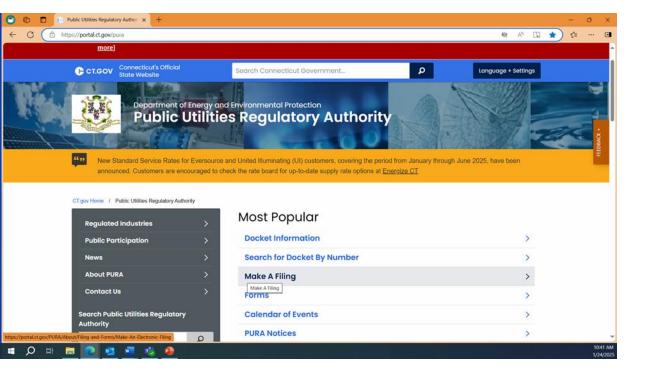
C thttps://portal.ct.gov/pura/about/filing-and-forms/mak	n-electronic-filing 💩 A ^h	G 🗘	£ ·
Regulated Industries	Make An Electronic Filing		
Public Participation	>		
News	Submission of Confidential Materials 1 Bonds and Letters of Credit / Notarization 1		
About PURA	File a Public Comment 1		
Contact Us	Accommodations 📆		
Search Public Utilities Regulatory Authority by Keyword	Effective March 2020, PURA is no longer requiring paper copies of documents filed electronically through the Web Filing System.		
	Registration		
	You must first register here to access the web-filing account management system and submit an electr filing to PURA. From here you can create a new account, modify an existing account, or request forgotte log-in information.		
	Instructions: How to Register with the PURA Website 🛒		
	Definitions		
	Log-In		тор



Accessing the filing portal

https://portal.ct.gov/pura

"Make A Filing"



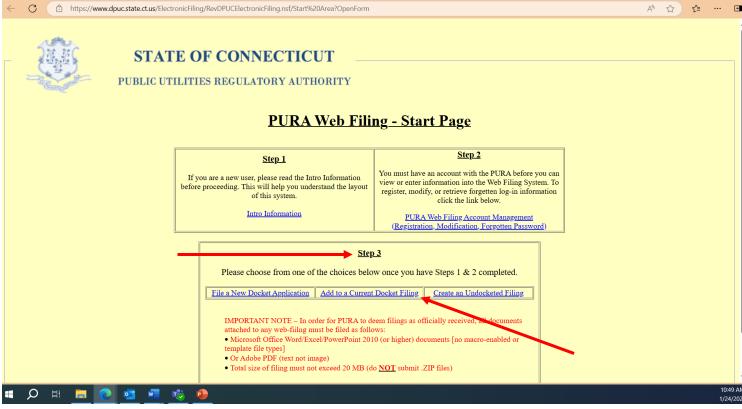
Scroll down to "Log-In" and click "log-in here"

0	Ø		Public Utilities Regulatory Author	X Make An Electronic Filing	× +				12	0	×
~	C	Ċ	https://portal.ct.gov/pura/about/	filing-and-forms/make-an-electr	onic-filing	R	\forall_{θ}	CG 🖸	5	`≊ ··	• 🖻
			News	>	Submission of Confidential Materials 📆 Bonds and Letters of Credit / Notarization 📆						
			About PURA	>	File a Public Comment 📆						
			Contact Us	>	Accommodations						
			Search Public Utilitie Authority by Keyword	es Regulatory	Effective March 2020, PURA is no longer requiring paper copies of documents filed			-			ACK +
					electronically through the Web Filing System.						FEEDBACK
					Registration						
					You must first register here to access the web-filing account management system and submit filing to PURA. From here you can create a new account, modify an existing account, or reque			ic			
					log-in information.						
					Instructions: How to Register with the PURA Website						
					Definitions						
					Log-In						
					Existing users can log-in here to access the PURA web-filing system.						
					Notifications					TOP	
					Sign up for public notification emails here.						-
	0			** 1							10:45 AM



👘 🔲 Public Utilities Regulatory Authori 🗙 📄 Make An Electronic Filing × J State of CT - Public Utilities Regule × + ▲ ☆ ੯ … ⊡

FILING at the PURA Web Filing – Start Page



Under "<u>Step 3</u>" click "Add to a Current Docket Filing"

This will take you to the log-in page, where you will enter your User name and Password and "Sign In"



10:49 AM

FILING at the PURA PORTAL (<u>https://portal.ct.gov/pura</u>)

Enter the Docket Number, which for this year is **24-08-02RE01**. Then Choose the Type of Filing.



Compliance (for all your compliance filings) or Motions (for motions for protective order)

Regulatory Authori 🗙 📗 Make	An Electronic Filing 🛛 🗙 🕎	State of CT - Public Utilities Regule × +				
uc.state.ct.us/ElectronicFiling/F	RevDPUCElectronicFiling.nsf/Men	uForm?OpenForm				
STATE OF	CONNECTIO	CUT				
PUBLIC UTILITIES	5 REGULATORY AUT	Choose the Type of Filing				
	DPUC Web	Application	<u>ase Filings</u>			
		Briefs				
		Compliance	ow.			
		Correspondence				
		Interrogatories Issued				
		Interrogatory Responses				
		Late File Exhibits (LFE)				
		Motions				
		Objections/Comments on Motion				
		Pre-filed Testimony				
	ANNUAL RESIDENTIAL F 2024 - CO	Written Comments in response to a Notice	OGRAM REVIEW - YEAR			
	2024 - CO	Written Exceptions to a Draft Decision				
		Choose the Type of Filing	~			
Don't know your Docket Number?						
		Back to Previous Page				

FILING at the PURA PORTAL (<u>https://portal.ct.gov/pura</u>)



An Electronic Filing

Compliance

× +

Submit Form

Filing page for a compliance filing.

Confirm the correct Docket.

"On Behalf of What Entity":

 information about your company: Company name, contact at the company, phone & email, "Submitter of Filing" is the person or entity submitting the documents, and "Pertains to What Entity" is your company. (Accept any pre-population as accurate.)

Order #(s): 33 (marketing & training) or 34 (financial benefits docs)

Can file separately or together

Description: Marketing, Training, Financial Benefits, Compliance, etc.

Choose File to upload

SUBMIT FORM

You will get a confirmation of filing that you should keep for your records.

Any questions about how to file in the docket system?

For document filing assistance, please contact the PURA Executive Secretary at 860-827-2836 or <u>PURA.ExecutiveSecretary@ct.gov</u>

You can also contact me: Jamie.Spannhake@ct.gov

For technical issues, contact DEEP IT at 860-424-3882 or <u>Deep.Helpdesk.Footprints@ct.gov</u>

Common Errors to Avoid

- DO NOT FILE compliance docs as correspondence or something other than compliance
 - INSTEAD: File compliance documents as compliance, not as correspondence or some other document
- DO NOT FAIL to file anything explaining that you don't have responsive documents



Don't know your Docket Number?

DF CONNECTICUT

- INSTEAD: File a letter <u>as compliance</u> stating that you don't have any documents, e.g. we don't have marketing materials, we don't use training materials, we didn't complete any projects in 2024, etc.
- DO NOT ATTACH reducted documents to your motion for protective order
 - INSTEAD: File redacted documents as compliance and refer to the documents in your motion for protective order
- DO NOT FILE your motion for protective order as correspondence or compliance
 - INSTEAD: File your motion for protective order as a motion with a supporting affidavit
- Remember: if you file redacted documents, you MUST also submit contemporaneously the unredacted documents to PURA's Executive Secretary AND file a motion for protective order as a motion with a supporting affidavit in the docket.



Disciplinary Framework: Four-Strike System

Established in Dockets No. 20-07-01 and No. 23-08-02*

Four-strike system for enforcing the RRES program rules and addressing violations.

- First strike is a warning with no further ramifications.
- Second strike may result in a six-month ban from the RRES program.
- Third strike may result in an 18-month ban from the RRES program.
- Fourth strike may result in a permanent ban from the RRES program.

Administered by EOE

EOE may recommend the assessment of multiple strikes for a single audit (i.e. each year) if multiple violations are identified, particularly if they are severe.

*Docket No. 20-07-01, Interim Decision, Feb. 10, 2021, <u>PURA Implementation of Section 3 of P.A. 19-35, Renewable Energy tariffs and</u> <u>Procurement Plans</u>, p. 27; and Docket No. 23-08-02, Final Decision, Nov. 1, 2023, <u>Annual RRES Program Review – Year 3</u>, pp. 24-28.

Disciplinary Framework: Four-Strike System

- EOE has discretion to determine when to issue strikes and how many to issue for each violation
- Violations include:
 - breaches of the RRES Program Manual
 - clearly deceptive or misleading marketing practices, as determined by EOE
 - failure to comply with the compliance filing obligations each year
 - not responding to additional requests for information issued by EOE





Jamie Spannhake, EOE Staff Attorney, Jamie.Spannhake@ct.gov

_



Jamie Spannhake, EOE Staff Attorney, Jamie.Spannhake@ct.gov



RRES Annual Compliance Filing Webinar

Kyle Wallace VP, Public Policy & Government Affairs

January 30, 2025

🛟 PosiGen



32

General Tips For Installers



- Start gathering information as early as possible. It will likely take coordination from multiple internal teams to gather all of the necessary information.
- The first filing is the hardest. Once you have been through the process, you will have templates and future years should be easier.
- Use it as a learning opportunity. You may discover gaps or inconsistencies in your processes or materials that are worth correcting.
- If you have questions on the requirements, reach out to EOE. If you have questions on the mechanics of filing, call PURA they are happy to help.
- If you're uploading a large number of documents (disclosure forms or marketing), don't try and upload them in the online submission. Upload a few and then have the PURA clerk help with the rest.
- Future changes to the Annual Compliance Filing would be explored in the RRES Annual Review Docket (docket format 2X-08-02), which you can participate in. Final Decisions typically are issued in November of each year.

All filings made in Docket 24-08-02RE01

Filing Type: Motion or Compliance	Confidential Treatment	Notarized?	PURA Order #
With Motion	No		N/A
With Motion	No		N/A
With Motion	No		N/A
With Motion	No	Yes	N/A
Compliance Filing	No		N/A
Compliance Filing	Yes ; except for production and system size		Order No. 34
Compliance Filing	No, must be filed publicly		Order No. 33
Compliance Filing	No, disseminated to the public		Order No. 33
Compliance Filing	Yes , except columns for system size, estimated production, and extrapolated 20 year savings and utility rate		Order No. 34
Compliance Filing	No		Order No. 34
	ComplianceWith MotionWith MotionWith MotionOmpliance FilingCompliance Filing	ComplianceConfidential TreatmentWith MotionNoWith MotionNoWith MotionNoWith MotionNoCompliance FilingNoCompliance FilingYes; except for production and system sizeCompliance FilingNo, must be filed publiclyCompliance FilingNo, disseminated to the publicCompliance FilingYes, except columns for system size, estimated production, and extrapolated 20 year savings and utility rate	ComplianceConfidential TreatmentNotarized?With MotionNoWith MotionNoWith MotionNoWith MotionNoWith MotionNoYesYesCompliance FilingNoCompliance FilingNo, must be filed publiclyCompliance FilingNo, disseminated to the publicCompliance FilingNo, disseminated to the publicCompliance FilingNo, disseminated to the publicCompliance FilingNo, disseminated to the publicCompliance FilingNoCompliance FilingNoNoYes, except columns for system size, estimated production, and extrapolated 20 year savings and utility rateCompliance FilingNo

PosiGen

Motion for a Protective Order



- The Motion for a Protective Order <u>does not</u> need to be written or filed by an attorney, but can be. However, it must contain specific legal arguments with supporting facts on why the information should be confidential.
- What are the possible relevant legal arguments for confidentiality under CT's FOIA Statute (<u>General Statutes</u> <u>§ 1-210</u>)?
 - (b)(2) Protection of customer personal identifying information
 - (b)(5A) Trade secrets which may include "formulas, patterns, compilations, programs, devices, methods, techniques, processes, drawings, cost data, customer lists..." from which economic value can be derived from their disclosure and where the business takes reasonable steps to maintain secrecy.
 - **(b)(5B)** Commercial or financial information given in confidence and not required by statute.
 - (b)(20) Records of standards, procedures, processes, software and codes, not otherwise available to the public, the disclosure of which would compromise the security or integrity of an information technology system.
- The accompanying affidavit <u>must</u> be notarized. Must also include a Proposed Protective Order and Nondisclosure Agreement.



<u>Motion</u>

- Example 1
- Example 2
- Example 3

<u>Affidavit</u>

- Example 1
- Example 2
- Example 3

Proposed Protective Order

- Example 1
- Example 2
- Example 3

Treatment of Confidential Material



- For any documents that contain confidential material that is covered by your Motion for a Protective Order you will need to:
 - Unredacted versions emailed directly to PURA Executive Secretary (jeff.gaudiosi@ct.gov)
 - Subject line <u>must</u> say "CONFIDENTIAL MATERIAL NOT FOR PUBLIC DISCLOSURE" and the docket number.
 - Each page of the documents should include a header that says "CONFIDENTIAL NOT FOR PUBLIC DISCLOSURE"
 - For large files, you can utilize Dropbox or Google Drive folders.
 - Redacted versions should be filed as a compliance filing in the docket.
 - Ensure that your redactions are actually redacting the information!
 - Do not use MS Paint or other software to put black marks over the text, this will not remove the information.
 - Programs such as Adobe Acrobat have a redact feature.
 - For spreadsheets, delete the underlying data in the redacted file version and cover with black fill for those cells.

Confidential and public version should be filed at the same time as the Motion for a Protective Order!

PosiGen

Treatment of Confidential Material



CONFIDENTIAL MATERIAL - NOT FOR PUBLIC DISCLOSURE - Docket No. 23-08-02RE01 - PosiGen (External) Index x

+ Summarize this email

Kyle Wallace <kwallace@posigen.com> to Jeff.Gaudiosi -

Hello,

A Motion for a Protective Order has been filed in Docket 23-08-02RE01. The unredacted confidential materials covered by the Motion are in this folder link. Please let me know if you have any questions or have issues accessing the documents.

Thank you,

	CONFIDENTIAL - NOT FOR PUBLIC DIS	
ummary Sheet Column	Explanation	
ite Address	N/A	
Itility Account Number	N/A	
stimated Year 1 Solar Production	The estimated first year production of the system.	

🛟 PosiGen

Financial Benefits Summary Sheet



		CONFIDENTIAL - NOT FOR PUBLIC DISCLOSURE						
	Site Address	Utility Account - Number	Annual Contract Rate Increase Amount	Estimated Year 1 Production as Percentage = of Customer Usage	Estimated Year 1 Customer Net Savings	Starting Utilty Rate for Year 1 Savings (\$/kWh)	Estimated Savings over the RRES Term (20 years)	Utility Rate used for 20 = Year Savings
990 Pro	ospect Ave, Hartford, CT 06105	12345678901	2.90%	92%	\$850	\$0.30	\$18,000	\$0.350

- The Financial Benefits Narrative provides a description of the inputs and calculations that were used to produce the figures in the Summary Sheet.
- For customer-owned systems:
 - Column 3 should state "direct ownership"
 - Column 5 should convert monthly amount on disclosure form to an annual savings.
- Columns 4, 7 & 8 <u>cannot</u> be redacted.

From Disclosure Form If provided to customers. If not provided to customers then enter "N/A."

Financial Benefits Summary Sheet Q&A

Q: There are multiple entities involved with the solar project, who is responsible for including a project in their Annual Compliance Filing? A: The entity that applied for the RRES program through the utility should include the project on their filing.

Q: Which projects need to be included in the sheet?

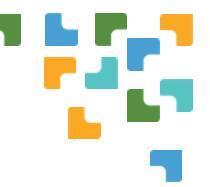
A: Only include projects that <u>received permission to operate/activated in the prior</u> <u>year</u>. If a project is a legacy project that qualified for net metering pre-RRES then it will not have the applicable disclosure form and does not need to be reported because it is not participating in the RRES program.

Q: Can I include additional columns or information in the Narrative or Summary Sheet?

A: Yes, you can but are not required to.

Financial Benefits Narrative

- Important! The entire Narrative document must be filed publicly, so ensure that it does not include any confidential information!
- Narrative should explain any calculation methodologies included in the Summary Sheet. It should also include list of documents, such as utility bills, shading reports, or contracts, where the information is derived from.
- **Consideration**: if your company has completed both Netting & Buy-All Tariff projects, you may want to explain that in the Narrative and identify that distinction in an additional column in the Summary Sheet.
- Installers <u>must</u> retain all of those documents listed in the Narrative at least until the end of the following year after the system is activated (through the end of 2025 for a system that was activated in 2024).



Marketing Materials & Sales Scripts

- Example Proposal
- Flyers
- One Pagers
- Billboard
- Digital Ads
- Video/Audio
- Sales scripts used with customers



Other Examples

Additional examples of Financial Benefit Narrative, Marketing Materials, Sales Training Scripts, or disclosure forms can be found in browsing the filings in <u>Docket 23-08-</u> 02RE01.

Filings are organized alphabetically by filing type and then date filed.

Notices - Important PURA notices for docket participants which include opening the docket, directing participants on a matter, or notification of scheduled meetings. **Correspondence -** Letters within the docket, including EOE issuing strikes after completing their review.

Compliance - Used by RRES installers for filing the required materials.

Motions - A Motion is used to ask PURA to take an action (motion for clarification, protective order, reconsideration, etc).

Rulings - PURA's ruling on a Motion. Please be aware that a ruling on someone else's motion could impact what you are required to do. If impacting all participants, likely will be issued through a Notice as well.

🛟 PosiGen



Connecticut Residential Renewable Energy Solutions Program – What Every Installer Needs to Know