

# The Connecticut Light and Power Company dba Eversource Energy September 28, 2022

## Final Procurement Plan for the Year 1 Non-Residential Renewable Energy Solutions Program

Pursuant to Order No. 18 of the Public Utilities Regulatory Authority’s (“the “Authority” or “PURA”) June 30, 2021, Decision in Docket No. 20-07-01 (the “Decision”), The Connecticut Light and Power Company d/b/a Eversource Energy (“Eversource”) hereby submits its Year 1 Procurement Plan for the approval of 114 20-Year Tariff Agreements for the purchase of Energy and Class I Renewable Energy Credits (“RECs”) from renewable energy projects in Connecticut. Pursuant to the PURA approved Year 1 Non-Residential Renewable Energy Solutions (“NRES”) Program Rules (“Program Rules”) and Public Act 19-35, Eversource conducted a solicitation from February 2022 to September 2022 for:

- (i) RECs and Energy from Low Emission Class I renewable projects (0-2000 kW) totaling 6.19 MW in Tariff Agreement commitments; and,
- (ii) RECs and Energy from Zero Emission Class I renewable projects in the following three categories:
  - a. Small Zero Emission – RECs and Energy from Class I renewable projects (less than or equal to 200 kW) totaling 9.952 MW in Tariff Agreement commitments; and,
  - b. Medium Zero Emission – RECs and Energy from Class I renewable projects (greater than 200 and less than or equal to 600 kW) totaling 12.77 MW in Tariff Agreement commitments; and,
  - c. Large Zero Emission – RECs and Energy from Class I renewable projects (greater than 600 kW and less than or equal to 2000 kW) totaling 17.205 MW in Tariff Agreement commitments.

This Year 1 NRES Procurement Plan outlines the competitive procurement process and the results of the same for those projects that executed Agreements and provided Performance Assurance in the Year 1 Request For Proposals (“RFP”).

Below is a summary of the capacities for the Year 1 RFP:

	Low Emission	Large Zero Emission	Medium Zero Emission	Small Zero Emission	Total
MW Available	8.000	18.000	12.000	10.000	48.000
MW Reallocated	0.000	-0.795	0.795	0.000	0.000
MW Executed	6.190	17.205	12.770	9.952	46.117
MW Remaining	1.810	0.000	0.025	0.048	1.883

**I. The Procurement was Conducted in Compliance with the PURA-Approved Solicitation Plan and the Decision**

**A. Overview of Procurement Process and Schedule**

Eversource issued a joint RFP with The United Illuminating Company (“UI”) for Year 1 Low Emission, Large Zero Emission, Medium Zero Emission, and Small Zero Emission Projects, which was finalized, distributed, and opened within an accelerated time period. The Year 1 RFP was conducted in accordance with the Authority-approved Year 1 Program Rules. Eversource complied with the schedule for the RFP set forth below to the best of our ability given the numerous program design features and requirements which were new to the NRES program and had not been components of prior Connecticut renewable programs including but not limited to two different tariff options, system sizing requirements and sizing projects to multiple accounts and/or revenue meters, State, Agricultural, and Municipal (“SAM”) customer provisions, and site control provisions. Despite the accelerated timeline and new requirements, Eversource received a strong response to the Year 1 NRES RFP – a total of 253 bids were received and reviewed for eligibility. Many bidders did not ultimately submit bid information that clearly and sufficiently addressed eligibility requirements of the NRES program which required Eversource to contact bidders to confirm or ask for additional information to validate eligibility for an average of 3 issues per bid. Eversource allowed bidders to clarify or supplement information contained in their original bid but did not allow material revisions to bids during the eligibility process. The detailed review of bid information and extensive communication with bidders to clarify or supplement information was necessary for the Company to ensure it was awarding agreements to projects consistent with program rules and statutory requirements, which ultimately required an extension to the date of selection and notification of winning bidders in the original RFP schedule to June 17, 2022. Eversource notified the NRES distribution list throughout the eligibility process and provided updates on the anticipated date of selection and notification of winning bidders as appropriate, and ultimately complied with the schedule for the RFP set forth below:

**TABLE 1 – RFP Schedule (Year 1 RFP)**

<b>Action Item</b>	<b>Date</b>
Release of RFP	February 1, 2022
Opening of Small Zero Emission Category Two-Week Window	February 1, 2022 by 1:00 p.m. (Eastern Prevailing Time “EPT”), at which time the bid shall become firm, irrevocable and binding.
Bidders Conference – Webinar Only	February 7, 2022
Deadline for Submission of Questions	February 11, 2022

Action Item	Date
Closing of Small Zero Emission Category Two-Week Window	February 14, 2022 by 1:00 p.m. (Eastern Prevailing Time “EPT”), at which time the bid shall become firm, irrevocable and binding.
Bid Forms Due	March 14, 2022 by 1:00 p.m. (Eastern Prevailing Time “EPT”), at which time the Pricing shall become firm, irrevocable and binding.
Selection and Notification of Winning Bidders	On or about April 14, 2022
Tariff Agreement Execution	After Selection and Notification of Winning Bidders. Bidders will have to return partially executed contracts by the date established by the Companies which is expected to be approximately 10 business days.
Subsequent Rounds of Selection and Notification of Winning Bidders	Approximately 5 business days after Tariff Terms Agreement Execution date (date on which executed Tariff Terms Agreement is due to the EDC for each round of selection). After each Tariff Terms Agreement Execution Date, each EDC will reevaluate its available MWs and reallocate to the next project(s) in the queue as necessary and notify selected Bidders accordingly.
Tariff Agreement(s) Filed with PURA	On or before July 1, 2022. <sup>1</sup>
Commencement of Service	In accordance with Tariff Agreements

**B. Overview of Procurement Results**

Eversource received 248 Bids by the RFP deadline of 1:00 PM (Eastern Prevailing Time) on March 14, 2022. Eversource also received 7 additional Bids as a result of the re-opening of the Bid window for certain aggrieved Bidders. Eversource notes that 2 of the 7 additional Bids received were duplicate submissions included in the original 248. In total, Eversource received

<sup>1</sup> In its ruling on Motion No. 42, the Authority required Eversource to:

(1) provide the winning bidders notified on June 17, 2022, an additional five (5) business days (i.e., until July 1, 2022) to submit customer signatures, assurance payments, and other award-acceptance documentation; (2) not later than July 1, 2022, submit a list of selected projects to the Authority, listed in the order in which the projects have been or will be provided the award acceptance documentation and identifying disqualified bids and any projects for which award acceptance documentation has been completed; and (3) at the conclusion of the rolling award notification process, submit as part of its compliance filing for Order No. 18, a listing of all selected projects for which award acceptance documentation has been ultimately completed.

Ruling on Motion No. 42 at 3.

253 unique Bids. These Bids were comprised of 13 Low Emission Bids, 45 Large Zero Emission Bids, 47 Medium Zero Emission Bids, and 148 Small Zero Emission Bids.

As a result of some selected Bidders either not accepting Eversource's Tariff Agreement offer and executing the Agreements or not providing performance assurance, Eversource had capacity remaining the Year 1 Low Emission, Small Zero Emission, Medium Zero Emission, and Large Zero Emission categories after the first round of selection and notification of winning bidders. The available capacity was then offered to eligible Projects in each category until either no Bids were left in the queue or the remaining capacity became insufficient to select the next Project.

At the conclusion of the selection process Eversource re-allocated the remaining capacity in the Large Zero Emission category, which was insufficient to select the next Bid in the Large Zero Emission queue, to the Medium Zero Emission category. Per Section 5.3.2 of the NRES Program Rules "If either EDC has uncommitted MWs remaining in any of the categories after the solicitation is completed, the EDCs will attempt to aggregate some or all of their respective MWs in an attempt to accommodate the next lowest priced Project in their respective Bid stack for the Medium and Large Zero Emission categories." This allowed Eversource to perform additional selections in the Medium Zero Emission category.

Upon completion of the Procurement, Eversource had received Performance Assurance and partially executed Tariff Agreements for 114 Projects which comprised of the following:

- 7 Low Emission Tariff Agreements for a total capacity of 6.19 MW. 1.81 MW remains as all eligible Bids were selected, however due to projects declining to execute Tariff Agreements there were no remaining projects in the queue to allocate the remaining available MWs.
- 10 Large Zero Emission Tariff Agreements for total capacity of 17.205 MW. There was .795 remaining after the second round of selections which was insufficient to select the next Bid in the queue. That .795 MW was reallocated to the Medium Zero emission category which results in 0 MW remaining in the Large Zero Emission category.
- 28 Medium Zero Emission Tariff Agreements for a total capacity of 12.77 MW. After the addition of the .795 MW from the Large Zero Emission category, .025 MW remains and was insufficient to select the next eligible Bid in the queue.
- 69 Small Zero Emission Tariff Agreements for a total capacity of 9.952. The remaining .048 MW is insufficient to select the next eligible Bid in the queue.

In accordance with Section III.B.4 of the Final Decision dated June 30, 2021 in Docket No. 20-07-01, the MWs not selected in the Year 1 NRES RFP will not roll over into the Year 2 NRES RFP.

### **Bid(s) Disqualified:**

Between March and July 2022, Eversource performed Bid evaluations to accurately determine Projects eligible for consideration in the NRES Program. Upon completion of its assessment, Eversource determined that forty-five (45)<sup>2</sup> Bids were not eligible for NRES Program participation based on eligibility criteria established in the Year 1 NRES Program Rules. As explained in our June 16, 2022 Compliance filing in docket 21-08-03, the bids were disqualified for the following reasons: (1) Size to load requirements – systems sized higher than historical load; (2) Failure to submit an interconnection application prior to the submission of a New Construction Bid; (3) Failure to obtain Customer of Record’s signature on the Bid Certification Form; (4) Crossover with the LREC/ZREC Program; (5) Compensation structures – Netting Bid behind a revenue meter with an existing Netting Project; (6) Bidder requested to change fundamental structures of the Bid post submission; (7) Crossover with the Virtual Net Metering Program (8) Failure to demonstrate site control; (9) Failure to meet SAM criteria; (10) Insufficient evidence system was sized not to exceed historical load.

Eversource reviewed all bids in accordance with the PURA approved modified program rules and determined that all of the disqualifications noted above did not present unnecessary barriers to entry, and their disqualifications were not in conflict with the objectives of the program, and therefore were clear violations of program rules which were not rectifiable. Eversource communicated both the reason for disqualification and the supporting language from the program rules to each affected Bidder at the time of disqualification notice.

### **C. List of Exhibits**

Below is a list of exhibits to this Year 1 Non-Residential Renewable Energy Solutions Procurement Plan. The exhibits include information that is responsive to guidance provided by the Authority regarding information needed in connection with the Authority’s review and approval of the Tariff Agreements.

Exhibit A: Year 1 NRES Procurement Plan

Exhibit B1: List of bids received and selected

Exhibit B2: (Confidential) List of bids received and selected

Exhibit C: Form of Tariff Agreement executed by all project owners

Exhibit D (Confidential): Partially Executed Tariff Agreements

---

<sup>2</sup> Please note that forty-eight (48) Bids were initially disqualified in Eversource’s June 16, 2022, Compliance filing in Docket 21-08-03. Subsequent to that filing, three (3) Bids were reinstated based on updated information provided by Bidders.