

SUSTAINABLE ENERGY ADVANTAGE, LLC

RHODE ISLAND REGROWTH	:	WRITTEN COMMENTS
PROGRAM YEAR 2027 DEVELOPMENT	:	SEPTEMBER 2, 2026

**RESPONSE TO SUSTAINABLE ENERGY ADVANTAGE’S REQUEST FOR WRITTEN
COMMENTS ISSUED AUGUST 26, 2026**

Verogy Holdings, LLC (“Verogy”) respectfully submits the following written comments in response to questions issued by the Sustainable Energy Advantage, LLC (“SEA”) dated August 26, 2026, intended to strengthen the viability of the Rhode Island REGrowth Program (“REG Program”) for the upcoming 2027 – 2029 three-year program cycle.

Please find Verogy’s comments below:

1. Tariff Implications on 2027 Module Prices

- a) Verogy asserts that the 15% ad valorem duty in combination with the various minimum import prices established by the Federal government on August 6, 2026 will have significant and immediate impacts on all modules available for REG Program projects participating in Program Year 2027 and later. Through conversations with module suppliers and internal analysis, Verogy suspects that the August 6 price controls will likely increase module cost by AT LEAST \$0.11 - \$0.13/Wdc for imported modules and \$0.10 - \$0.15/W for domestically manufactured modules (though the impact to domestic module prices is less certain at this time).

Notably, while these price control measures are scheduled to go into effect December 4, 2026, an upward impact on module prices is immediately effective as both domestic and international module suppliers are aware of the decision and realize that buyers now have extra incentive to purchase modules prior to December 4, 2026. Therefore, nearly all projects that participate in Program Year 2027 and later will be affected by the August 6 Proclamation.

2. FCC Inverter Ban Implications on 2027-2029 REG Project Costs

- a) Verogy suggests that for the foreseeable future the FCC Inverter Ban will not materially affect REG Program project build costs assuming interconnecting utilities continue to approve

interconnection agreements utilizing existing codes and technologies available today. However, this ban essentially imposes a “technology freeze” and therefore poses a risk that if interconnecting utilities update interconnection requirements as technology evolves in the future, inverter supply could become extremely constrained leading to material build cost increases. At this time Verogy is unable to estimate the quantum of price increase should interconnection requirements evolve while imported inverter technology is “frozen” by the FCC Inverter Ban.

Verogy thanks SEA for the opportunity to provide written comments for consideration in the REGrowth Program development for Program Year 2027.

Respectfully submitted,



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