

STATE OF CONNECTICUT

DEPARTMENT OF PUBLIC UTILITY CONTROL

APPLICATION OF THE UNITED : DOCKET NO. 05-06-04RE04
ILLUMINATING COMPANY TO INCREASE :
ITS RATES AND CHARGES – PUBLIC ACT :
07-242, SEASONAL RATES, NON :
GENERATION-RELATED TIME-OF-USE :
PRICING AND RELATED RATE DESIGN : NOVEMBER 2, 2007
ISSUES :

**PETITION OF RETAIL ENERGY SUPPLY ASSOCIATION
TO INTERVENE**

The Retail Energy Supply Association (“RESA”)¹ hereby petitions the Department of Public Utility Control (“Department”) to be designated an intervenor in the above-captioned proceeding pursuant to section 4-177a(b) of the General Statutes and section 16-1-18 of the Regulations of Connecticut State Agencies. In support of this petition, RESA states as follows:

1. On July 25, 2007, the Department reopened the instant proceeding to address modifications to the tariffs of The United Illuminating Company (“UI” or “Company”) that are required by Public Act 07-242, *An Act Concerning Electricity and Energy Efficiency* (“Act”) and to consider other rate design issues.² Included among the Act’s provision is a requirement that electric distribution companies offer critical peak or real-time pricing to all customer classes on a voluntary basis.³ In this proceeding, the Department will also examine: (1) the manner in which

¹ RESA’s members include Commerce Energy, Inc; Consolidated Edison Solutions, Inc; Direct Energy Services, LLC; Gexa Energy; Hess Corporation; Integrys Energy Services, Inc.; Liberty Power Corp.; Reliant Energy Retail Services, LLC; Sempra Energy Solutions; Strategic Energy, LLC; SUEZ Energy Resources NA, Inc.; and US Energy Savings Corp. The comments expressed in this filing represent the position of RESA as an organization but may not represent the views of any particular member of RESA.

² Decision, July 25, 2007, pp. 1-2, Docket No. 05-06-04.

³ Public Act 07-242, § 99.

time-of-use generation service charge (“GSC”) differentials should be established; (2) whether to establish seasonal GSC pricing; (3) whether to apply time-of-use pricing to non generation-related charges; and (4) other rate-design issues.⁴

2. Several RESA member companies are licensed by the Department to serve residential, commercial and industrial customers in Connecticut and are presently providing electricity service to customers in the state. Consequently, RESA has an interest in the continued development of the state’s retail electricity market.

3. The issues that will be addressed in this proceeding could have a significant effect on Connecticut’s retail electricity market because they directly affect UI’s generation rates against which electricity suppliers must compete and/or could alter market dynamics in other respects. Thus, RESA’s participation in this proceeding is in the interests of justice.

4. RESA’s experiences with rate-design issues in other states and their resulting impacts on retail electricity markets would be helpful to the Department in its consideration of the rate-design issues in this docket.

5. RESA acknowledges that it did not file this petition prior to the hearing in this proceeding as contemplated by Section 4-177a(b) of the General Statutes. RESA will not seek to present pre-filed testimony, propound interrogatories or make any other filings or requests in this proceeding that would delay the Department’s issuance of a final decision. Thus, RESA’s participation will not impair the orderly conduct of this proceeding.

6. RESA requests the right to submit legal briefs, cross-examine witnesses at any hearings to be conducted in this proceeding after the date of this petition and to otherwise participate fully in any such hearings.

⁴ Decision, July 25, 2007, p 2, Docket No. 05-06-04.


7. All notices and correspondence in this proceeding should be sent to:

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WHEREFORE, for the foregoing reasons, RESA requests that it be designated an intervenor in this proceeding.

Respectfully submitted,

RETAIL ENERGY SUPPLY
ASSOCIATION

By 
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