

STATE OF CONNECTICUT

DEPARTMENT OF PUBLIC UTILITY CONTROL

APPLICATION OF THE CONNECTICUT : DOCKET NO. 03-07-02RE10
LIGHT AND POWER COMPANY TO :
AMEND ITS RATE SCHEDULES – PUBLIC :
ACT 07-242, SEASONAL RATES, NON :
GENERATION-RELATED TIME-OF-USE :
PRICING AND RELATED RATE DESIGN :
ISSUES : SEPTEMBER 5, 2007

**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 Connecticut Light and Power Company (“CL&P” or “Company”) that are necessitated by changes in law imposed by Public Act 07-242, *An Act Concerning Electricity and Energy Efficiency* (“Act”).² Specifically, the Department will address the Act’s modification to the electric distribution companies’ obligation to provide time-of-use (“TOU”) rates to customers with a maximum demand of 350 kilowatts or more³ and their

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. 03-07-02.

³ *Id.* at 2; Public Act 07-242, § 85.

new obligation to offer critical peak or real-time pricing to all customer classes.⁴ The Department will also examine whether CL&P's generation service charge should be based on seasonal rates and whether it is appropriate to apply TOU pricing to non-generation components of customer bills.⁵ Finally, the Department will implement the provision of the Act that eliminates the one-year mandatory stay on supplier of last resort ("SOLR") service by customers who return to SOLR service after being served by competitive electricity suppliers.⁶

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 profound impact on Connecticut's retail electricity market because they directly affect CL&P'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 participation will not impair the orderly conduct of this proceeding. To the contrary, 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.

⁴ *Id.* at 2; Public Act 07-242, § 99.

⁵ *Id.* at 1-2.

⁶ *Id.* at 2; Public Act 07-242, § 49.

5. RESA requests the right to submit written comments or pre-filed testimony, present witnesses and submit legal briefs, propound interrogatories, cross-examine witnesses and otherwise participate fully in any hearings to be held in this proceeding.

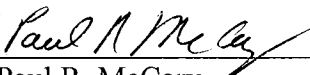
6. All notices and correspondence in this proceeding should be sent to:

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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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Its Attorneys