

BRIAN E. CALABRESE

280 Trumbull Street  
Hartford, CT 06103-3597  
Main (860) 275-8200  
Fax (860) 275-8299  
bcalabrese@rc.com  
Direct (860) 275-8320

Also admitted in West Virginia

*Via Electronic Filing and First Class Mail*

November 7, 2018

Jeffrey R. Gaudiosi, Esq.  
Executive Secretary  
Public Utilities Regulatory Authority  
10 Franklin Square  
New Britain, CT 06051

Re: **Docket No. 18-06-02: Review of Feasibility, Costs, and Benefits of Placing Certain Customers on Standard Service Pursuant to Conn. Gen. Stat. § 16-245o(m)**

Dear Mr. Gaudiosi:

Enclosed please find Retail Energy Supply Association's Motion for Extension of Time to Issue Interrogatories in connection with the above-referenced docket.

I certify that a copy hereof has been sent to all participants of record as reflected on the Public Utilities Regulatory Authority's (the "Authority's") service list as of this date. A copy has also been filed with the Authority as an electronic web filing and is complete.

Please do not hesitate to contact me if you have any questions or require additional information. Thank you.

Sincerely,



Brian E. Calabrese

Enclosures

Copy to: Service List

STATE OF CONNECTICUT

PUBLIC UTILITIES REGULATORY AUTHORITY

REVIEW OF FEASIBILITY, COSTS, AND : DOCKET NO. 18-06-02  
BENEFITS OF PLACING CERTAIN :  
CUSTOMERS ON STANDARD SERVICE :  
PURSUANT TO CONN. GEN. STAT. § 16- :  
245O(M) : NOVEMBER 7, 2018

**RETAIL ENERGY SUPPLY ASSOCIATION’S  
MOTION FOR EXTENSION OF TIME TO ISSUE INTERROGATORIES**

The Retail Energy Supply Association (“RESA”)<sup>1</sup> requests an extension of time until *November 29, 2018* or such later date that is one week after the filing of any pre-filed testimony to issue interrogatories in the above-referenced proceeding.

**BACKGROUND**

Connecticut General Statutes § 16-245o permits the Public Utilities Regulatory Authority (the “Authority”) to initiate a docket to review the feasibility, costs and benefits of placing on Standard Service all customers of all electric suppliers (1) who are hardship cases, (2) having moneys due and owing deducted from such customer bills by the electric distribution company, (3) receiving other financial assistance from an electric distribution company, or (4) who are otherwise protected by law from shutoff of electricity services.<sup>2</sup> “Hardship case” includes: (i) a customer receiving local, state or federal public assistance; (ii) a customer whose sole source of financial support is Social Security, Veterans’ Administration or unemployment compensation benefits; (iii) a customer who is head of the household and is unemployed, and the household

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<sup>1</sup> The comments expressed in this filing represent the position of the Retail Energy Supply Association (RESA) as an organization but may not represent the views of any particular member of the Association. Founded in 1990, RESA is a broad and diverse group of twenty retail energy suppliers dedicated to promoting efficient, sustainable and customer-oriented competitive retail energy markets. RESA members operate throughout the United States delivering value-added electricity and natural gas service at retail to residential, commercial and industrial energy customers. More information on RESA can be found at [www.resausa.org](http://www.resausa.org).

<sup>2</sup> Conn. Gen. Stat. §16-245o(m).

income is less than three hundred per cent of the poverty level determined by the federal government; (iv) a customer who is seriously ill or who has a household member who is seriously ill; (v) a customer whose income falls below one hundred twenty-five per cent of the poverty level determined by the federal government; and (vi) a customer whose circumstances threaten a deprivation of food and the necessities of life for himself or dependent children if payment of a delinquent bill is required.<sup>3</sup>

The Authority initiated the instant proceeding on June 4, 2018 to conduct the review permitted under Connecticut General Statutes section 16-245o.<sup>4</sup> On October 5, 2018, the OCC issued its First Set of Interrogatories to The United Illuminating Company (“UI”) and The Connecticut Light and Power Company d/b/a Eversource Energy (“Eversource”) (collectively, the electric distribution companies or “EDCs”).<sup>5</sup> These interrogatories request, among other things, various information about customers served by licensed suppliers, including RESA members. On October 15, 2018, the EDCs filed a joint motion requesting an extension of time until November 9, 2018 to file responses to the OCC’s First Set of Interrogatories.<sup>6</sup> The Authority granted the motion.<sup>7</sup> On October 19, 2018, UI filed responses to Interrogatories OCC-16, OCC-18, OCC-22, and OCC-25.<sup>8</sup> On October 26, 2018, RESA filed objections to certain of these interrogatories.<sup>9</sup> To date, no other responses have been filed.<sup>10</sup>

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<sup>3</sup> Conn. Gen. Stat. §16-262c(b)(3).

<sup>4</sup> Notice of Proceeding (Jul. 11, 2018).

<sup>5</sup> Office of Consumer Counsel’s First Set of Interrogatories (Oct. 5, 2018).

<sup>6</sup> Joint Motion of The Connecticut Light and Power d/b/a Eversource Energy and The United Illuminating Company (Motion No. 3) (Oct. 15, 2018).

<sup>7</sup> Motion No. 3 Ruling (Oct. 19, 2018).

<sup>8</sup> UI Responses to Interrogatories OCC-16, OCC-18, OCC-22, and OCC-25 (Oct. 19, 2018).

<sup>9</sup> Retail Energy Supply Association’s Objections to the OCC’s First Set of Interrogatories (Motion No. 5) (Oct. 26, 2018).

<sup>10</sup> *See generally* Docket No. 18-06-02.

## ARGUMENT

The Authority's time schedule for the instant proceeding calls for the third and final set of interrogatories to be issued on November 9, 2018, at 4:00 p.m.,<sup>11</sup> the same day and time as the EDCs are to file their remaining responses to the OCC's interrogatories. Depending the EDCs' responses to the OCC's interrogatories, it may be necessary to issue further interrogatories to clarify or to explore the EDCs' responses further. Doing so, however, will require review and analysis of the EDCs' responses. As a practical matter, it would be very difficult, if not impossible, to complete this review and analysis and to develop and to file further interrogatories on the very same day as the responses are filed. Accordingly, RESA requests that additional time be provided for the issuing of interrogatories.

Further, to the extent that any pre-filed testimony is filed in the instant proceeding, an opportunity should be provided for the filing of interrogatories on issues raised in such pre-filed testimony.

## CONCLUSION

For the reasons set forth above, the Authority should grant an extension of time until **November 29, 2018** or such later date that is one week after the filing of any pre-filed testimony to issue interrogatories in the above-referenced proceeding.

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<sup>11</sup> Time Schedule (date of last revision: Oct. 4, 2018). The Time Schedule provided for a second set of interrogatories to be issued on October 22, 2018, but no interrogatories were issued then. *See generally* Docket No. 18-06-02.

Respectfully Submitted,  
RETAIL ENERGY SUPPLY  
ASSOCIATION

By: 

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Brian E. Calabrese  
Robinson & Cole LLP  
280 Trumbull Street  
Hartford, CT 06103  
Phone: (860) 275-8200  
Fax: (860) 275-8299  
E-mail: [bcalabrese@rc.com](mailto:bcalabrese@rc.com)

**CERTIFICATION**

I hereby certify that a copy of the foregoing was sent to all participants of record on this  
7th day of November 2018.

*Brian E. Calabrese*

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