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Via Electronic Filing and Hand Delivery

February 27, 2019

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)**

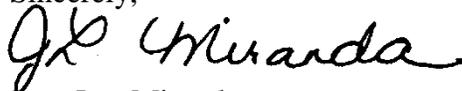
Dear Mr. Gaudiosi:

Enclosed please find the Retail Energy Supply Association's Second Set of Interrogatories to the Electric Distribution Companies (RESA-EDC-10 to RESA-EDC-26) in connection with the above-referenced proceeding.

I certify that a copy hereof has been sent to all participants of record as reflected on the Public Utilities Regulatory Authority's ("Authority") 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,



Joey Lee Miranda

Enclosure

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- :
2450(M) : FEBRUARY 27, 2019

**RETAIL ENERGY SUPPLY ASSOCIATION'S
SECOND SET OF INTERROGATORIES
TO THE ELECTRIC DISTRIBUTION COMPANIES**

The Retail Energy Supply Association (“RESA”) requests responses from The Connecticut Light and Power Company d/b/a Eversource Energy and The United Illuminating Company (each, a “Company”) to the following interrogatories in the above-captioned proceeding by *March 13, 2019*.

INSTRUCTIONS

1. Please list each question and answer on the same sheet of paper using a separate sheet for each interrogatory number, and sequentially number the pages of each response (e.g., p. 1 of 5, etc.). At the top of each page, clearly identify the Docket Number, the interrogatory number (including the prefix), the name of the responding entity, the person responsible for the response, and the date of submission.
2. If a response to any of the requested information has already been filed in response to another Participant’s interrogatory in this proceeding, please reference the interrogatory that provides the information.
3. If the Company contends that any answer to any of these interrogatories is privileged in whole or in part, file with the response to these interrogatories a statement in writing that: (1) identifies each such interrogatory answer; (2) states its general subject matter;

and (3) states in detail the basis for each claim of privilege made with respect to it. If a claim of privilege is made to only a part of a response, then in addition to the statement required herein, produce a public copy of such response from which the alleged privileged portion has been redacted, noting where such redactions have been made.

4. If subsequent to the Company's initial responses to these interrogatories, the Company discovers additional or new material or information responsive to any interrogatory or that any response provided herein was totally or partially incorrect or, even though correction was made, a response is no longer true, the Company must promptly file supplemented and/or corrected responses.

INTERROGATORIES

RESA-EDC-10. For each of the following, explain how a residential customer establishes that:

- (a) (s)he is receiving local, state or federal public assistance;
- (b) his/her sole source of financial support is Social Security, Veterans' Administration or unemployment compensation benefits;
- (c) (s)he is head of the household and is unemployed, and has a household income that is less than three hundred per cent of the poverty level determined by the federal government;
- (d) (s)he is seriously ill or has a household member who is seriously ill;
- (e) his/her income falls below one hundred twenty-five per cent of the poverty level determined by the federal government; and
- (f) his/her circumstances threaten a deprivation of food and the necessities of life for him/herself or dependent children if payment of a delinquent bill is required?

RESA-EDC-11. For each of the following, explain how often a residential customer must establish that:

- (a) (s)he is receiving local, state or federal public assistance;
- (b) his/her sole source of financial support is Social Security, Veterans' Administration or unemployment compensation benefits;

- (c) (s)he is head of the household and is unemployed, and has a household income that is less than three hundred per cent of the poverty level determined by the federal government;
- (d) (s)he is seriously ill or has a household member who is seriously ill;
- (e) his/her income falls below one hundred twenty-five per cent of the poverty level determined by the federal government; and
- (f) his/her circumstances threaten a deprivation of food and the necessities of life for him/herself or dependent children if payment of a delinquent bill is required.

RESA-EDC-12. Does the Company rely on a third-party to determine if:

- (a) a residential customer is receiving local, state or federal public assistance;
- (b) a residential customer's sole source of financial support is Social Security, Veterans' Administration or unemployment compensation benefits;
- (c) a residential customer is head of the household and is unemployed, and has a household income that is less than three hundred per cent of the poverty level determined by the federal government;
- (d) a residential customer is seriously ill or has a household member who is seriously ill;
- (e) a residential customer's income falls below one hundred twenty-five per cent of the poverty level determined by the federal government; or
- (f) a residential customer's circumstances threaten a deprivation of food and the necessities of life for him/herself or dependent children if payment of a delinquent bill is required?

RESA-EDC-13. If the answer to RESA-EDC-12 is yes:

- (a) who is the third-party that makes the determination for each category identified in RESA-EDC-12; and
- (b) what documentation does the Company require from the third-party or from customers to establish that customers qualify for each category identified in RESA-EDC-12?

RESA-EDC-14. During what period of time (e.g., year round, November 1-May 1, etc.), if any, are each of the following types of residential customers protected from shutoff of electricity services:

- (a) residential customers receiving local, state or federal public assistance;

- (b) residential customers whose sole source of financial support is Social Security, Veterans' Administration or unemployment compensation benefits;
- (c) residential customers who are head of the household and are unemployed, and have a household income that is less than three hundred per cent of the poverty level determined by the federal government;
- (d) residential customers who are seriously ill or who have a household member who is seriously ill;
- (e) residential customers whose income falls below one hundred twenty-five per cent of the poverty level determined by the federal government; and
- (f) residential customers whose circumstances threaten a deprivation of food and the necessities of life for him/herself or dependent children if payment of a delinquent bill is required?

RESA-EDC-15. For each of the following, explain how the Company knows when:

- (a) a residential customer is no longer receiving local, state or federal public assistance;
- (b) a residential customer's sole source of financial support is no longer Social Security, Veterans' Administration or unemployment compensation benefits;
- (c) a residential customer is no longer head of the household and is no longer unemployed, and no longer has a household income that is less than three hundred per cent of the poverty level determined by the federal government;
- (d) a residential customer is no longer seriously ill or no longer has a household member who is seriously ill;
- (e) a residential customer's income is no longer below one hundred twenty-five per cent of the poverty level determined by the federal government; and
- (f) a residential customer is no longer facing circumstances that threaten a deprivation of food and the necessities of life for him/herself or dependent children if payment of a delinquent bill is required?

RESA-EDC-16. Are there residential customers other than those identified in the Company's response to RESA-EDC-10 that are protected from shutoff of electricity services? If the answer is yes, describe:

- (a) what other types of residential customers are protected from shutoff of electricity services;
- (b) the period of time during which each type of residential customer identified in response to (a) is protected from shutoff of electricity services;
- (c) how each type of residential customer identified in response to (a) qualifies for protection from shutoff of electricity services;
- (d) how often each type of residential customer identified in response to (a) must establish that (s)he is qualified for protection from shutoff of electricity services; and
- (e) how the Company knows when each type of residential customer identified in response to (a) is no longer qualified for protection from shutoff of electricity services.

RESA-EDC-17. Are there residential customers other than those identified in RESA-EDC-10 and the Company's response to RESA-EDC-16 that have moneys due and owing deducted from their bills by the Company? If the answer is yes, describe:

- (a) what other types of residential customers have moneys due and owing deducted from their bills by the Company;
- (b) how each type of residential customer identified in response to (a) qualifies to have moneys due and owing deducted from his/her bill by the Company;
- (c) how often each type of residential customer identified in response to (a) must establish that (s)he qualifies to have moneys due and owing deducted from his/her bill by the Company; and
- (d) how the Company knows when each type of residential customer identified in response to (a) no longer qualifies to have moneys due and owing deducted from his/her bill by the Company.

RESA-EDC-18. Does the Company have financial assistance available to residential customers other than those identified in RESA-EDC-10 and the Company's responses to RESA-EDC-16 and RESA-EDC-17? If yes, describe:

- (a) what types of financial assistance are available to residential customers from the Company;
- (b) how a customer qualifies for each type of assistance identified in response to (a);

- (c) how often a customer must establish that (s)he qualifies for each type of assistance identified in response to (a); and
- (d) how the Company knows when a customer no longer qualifies for each type of assistance identified in response to (a).

RESA-EDC-19. For each of the following, does the Company ever notify an electric supplier that:

- (a) a residential customer is receiving local, state or federal public assistance;
- (b) a residential customer's sole source of financial support is Social Security, Veterans' Administration or unemployment compensation benefits;
- (c) a residential customer is head of the household and is unemployed, and has a household income that is less than three hundred per cent of the poverty level determined by the federal government;
- (d) a residential customer is seriously ill or has a household member who is seriously ill;
- (e) a residential customer's income falls below one hundred twenty-five per cent of the poverty level determined by the federal government;
- (f) a residential customer's circumstances threaten a deprivation of food and the necessities of life for him/herself or dependent children if payment of a delinquent bill is required;
- (g) a residential customer is protected from shutoff of electricity services;
- (h) a residential customer has moneys due and owing deducted from his/her bill by the Company; or
- (i) a residential customer is receiving financial assistance from the Company?

RESA-EDC-20. If the answer to any subparagraph of RESA-EDC-19 is yes:

- (a) By what method does the Company notify suppliers of each such classification?
- (b) How often does the Company notify suppliers of each such classification?
- (c) Does the Company ever notify suppliers when a residential customer no longer qualifies for each such classification? If yes, how and how often?

RESA-EDC-21. How many residential customers are electronically billed by the Company?

RESA-EDC-22. How many of each of the following categories of residential customers are electronically billed by the Company:

- (a) residential customers receiving local, state or federal public assistance;
- (b) residential customers whose sole source of financial support is Social Security, Veterans' Administration or unemployment compensation benefits;
- (c) residential customers who are heads of the household and are unemployed, and have a household income that is less than three hundred per cent of the poverty level determined by the federal government;
- (d) residential customers who are seriously ill or who have a household member who is seriously ill;
- (e) residential customers whose income falls below one hundred twenty-five per cent of the poverty level determined by the federal government;
- (f) residential customers whose circumstances threaten a deprivation of food and the necessities of life for him/herself or dependent children if payment of a delinquent bill is required;
- (g) residential customers who are protected from shutoff of electricity services;
- (h) residential customers who have moneys due and owing deducted from their bills by the Company; and
- (i) residential customers receiving financial assistance from the Company?

RESA-EDC-23. Does the Company issue any bill inserts on a regular schedule that inform customers of their ability to choose an electric supplier? If the answer is yes, what is that schedule?

RESA-EDC-24. Does the Company issue any bill inserts on a regular schedule that inform customers of the availability of www.energizect.com as a resource? If the answer is yes, what is that schedule?

RESA-EDC-25. Provide copies of all bill inserts the Company issued in 2016, 2017 and 2018 that informed customers of:

- (a) their ability to choose an electric supplier; or
- (b) the availability of www.energizect.com as a resource.

RESA-EDC-26. In response to Interrogatories OCC-3 and OCC-4, the Company provided data about, among other things, the supply rate charged by each competitive supplier licensed to market and sell electricity in the Company's service territory during a specified period of time. Does the Company know:

- (a) the renewable content of the products being provided to each customer whose data was reported in response to Interrogatories OCC-3 and OCC-4;
- (b) what, if any, rewards, gifts, or other value each customer whose data is reported in response to Interrogatories OCC-3 and OCC-4 received upon enrollment with each supplier; or
- (c) what, if any, rewards, gifts, or other value each customer whose data is reported in response to Interrogatories OCC-3 and OCC-4 receives on an ongoing basis from each supplier?

Respectfully Submitted,
RETAIL ENERGY SUPPLY
ASSOCIATION

By: 

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CERTIFICATION

I hereby certify that a copy of the foregoing was sent to all participants of record on this
27th day of February 2019.

A handwritten signature in black ink that reads "Joey Lee Miranda". The signature is written in a cursive style with a large, stylized initial "JL".

Joey Lee Miranda