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Via Electronic Filing and First Class Mail

June 13, 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 Responses to Interrogatories SEU-1 through SEU-5 and Interrogatory SEU-10 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

Docket No. 18-06-02

Witness Responsible:
Richard J. Hudson, Jr.

Retail Energy Supply Association

Date: June 13, 2019

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SEU-1 Refer to RESA Prefiled Testimony, p. 8, fn. 6. Who conducted and/or sponsored the survey referred to in this footnote?

RESPONSE:

There are three different surveys referenced in footnote 6 on page 8 of RESA's Pre-Filed Testimony. Based on a review of the surveys and accompanying press releases or news coverage, it is my understanding that the surveys were conducted or sponsored as follows.

1. <http://competitiveenergy.org/survey-shows-consumers-strongly-support-maintaining-existing-energy-choice-acces-says/>

Sponsor: American Coalition of Competitive Energy Suppliers
Survey Company: unknown

2. <https://cleanedge.com/Resources/news/National-Poll-Finds-US-Homeowners-Overwhelmingly-Want-Energy-Choice>

Sponsor: Clean Edge, Inc. and SolarCity
Survey Company: Zogby Analytics

3. <http://www.surveyusa.com/client/PollReport.aspx?g=fc4c85a3-cda9-44bd-abf8-f674770e1161>

Sponsor: Clean Choice Energy
Survey Company: Survey USA

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SEU-2 Refer to RESA Prefiled Testimony, p. 20. RESA maintains that during the period from January 2019 to March 2019, customers paid less with suppliers than with standard service. The table provides data for all customers. Please provide data for hardship customers only during this period.

RESPONSE:

Table RJH-3 presents the number and percentage of supplier-billed prices for the months of January 2019 through March 2019 that were less than the applicable Standard Service rate. The source data for Table RJH-3 are the electric distribution companies' supplier-billed price reports submitted in Docket No. 06-10-22. These price reports, as noted in the testimony, include information for all residential customers and are not segmented between hardship and non-hardship customers. Accordingly, it is not possible to provide a table, using the same source data, with information specific to hardship customers. However, Tables RJH-A and RJH-B include analogous information specific to hardship customers.

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SEU-3 Refer to RESA Prefiled Testimony, p. 41. RESA maintains that there is significant evidence that the retail choice market presents Connecticut consumers with a range of products and services and that retail suppliers offer customers significant value. Identify these products and services and demonstrate how each would directly benefit a hardship customer.

RESPONSE:

Please see pages 40 through 65 of RESA's Pre-Filed Testimony for a discussion of how various retail supplier products and value propositions may directly benefit hardship customers.

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SEU-4 For hardship customers enrolled from October 2016 to present, indicate by percentage what method was used for enrollment (i.e., telemarketing, door-to-door, face-to-face, online, or any other method).

RESPONSE:

Neither I nor the Retail Energy Supply Association have access to this information.

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SEU-5 For hardship customers enrolled from October 2016 to present, how many have received smart thermostats as part of their offers?

RESPONSE:

Neither I nor the Retail Energy Supply Association have access to this information.

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SEU-10 Discuss the legal mechanisms by which the Authority could place a price cap on supplier offers to hardship customers and whether Conn. Gen. Stat. § 16-245o(m) allows for such a price cap.

RESPONSE:

As a non-lawyer, I am unable to fully answer this question. However, I do note that the text of Connecticut General Statutes section 16-245o(m) does not expressly authorize a price cap on supplier offers to hardship customers. Instead, the statute states that, in a final decision in this proceeding, the Public Utilities Regulatory Authority may order that all hardship customers be placed onto Standard Service. I anticipate that RESA's counsel will address this issue further through briefing.

CERTIFICATION

I hereby certify that a copy of the foregoing was sent to all participants of record on this
13th day of June 2019.



Joey Lee Miranda