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*Via Electronic Filing and First Class Mail*

February 10, 2020

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

Re: **Docket No. 14-07-20RE01: PURA Development and Implementation of Marketing Standards and Sales Practices by Electric Suppliers – Revised Standards**

Dear Mr. Gaudiosi:

Enclosed please find the Retail Energy Supply Association's Motion to Postpone Hearing in the above-referenced matter.

I certify that a copy hereof has been sent to all parties and intervenors 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

PURA DEVELOPMENT AND : DOCKET NO. 14-07-20RE01  
IMPLEMENTATION OF MARKETING :  
STANDARDS AND SALES PRACTICES BY :  
ELECTRIC SUPPLIERS - REVISED :  
STANDARDS : FEBRUARY 10, 2020

**RETAIL ENERGY SUPPLY ASSOCIATION'S  
MOTION TO POSTPONE HEARING**

The Retail Energy Supply Association (“RESA”)<sup>1</sup> hereby requests that the Public Utilities Regulatory Authority (“Authority”) postpone the hearing in the above-referenced proceeding to March 2, 3, 16, 17 or 18, 2020. In support of this motion, RESA offers the following:

1. In 2014, the Connecticut General Assembly passed Public Act 14-75, *An Act Concerning Electric Customer Consumer Protection* (“Act”). Section 4 of the Act required, *inter alia*, that the Authority “initiate a contested proceeding to develop and implement, or cause to be implemented, standards relating to abusive switching practices, solicitations and renewals by electric suppliers, the hiring and training of sales representatives, door-to-door sales and telemarketing practices by electric suppliers.”<sup>2</sup> In response to this statutory requirement, the Authority opened the original phase of this proceeding<sup>3</sup> and, on February 4, 2015, issued a

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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 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> The relevant provisions of Section 4 of Public Act 14-75 were codified at Connecticut General Statutes section 16-245o(d)(2).

<sup>3</sup> See, generally, Docket No. 14-07-20, *PURA Development and Implementation of Marketing Standards and Sales Practices by Electric Suppliers* (“Docket 14-07-20”).

Decision adopting certain Electric Supplier Standards (“Original Standards”) and a disclosure statement.<sup>4</sup>

2. On March 19, 2015, the Office of Consumer Counsel and several suppliers jointly moved to reopen the docket “for the limited purpose of accepting, approving and implementing” certain mutually-agreed-upon proposed revisions to the Original Standards (“Supplier/OCC Revised Standards”) and to stay the Original Standards during the Authority’s consideration of the motion to reopen.<sup>5</sup> In response to the motion, the Authority agreed to reopen the docket.<sup>6</sup>

3. On May 8, 2015, in response to a request from the Authority,<sup>7</sup> a group consisting of various individual electric suppliers and RESA (“Supplier Group”) offered pre-filed testimony in support of the Supplier/OCC Revised Standards.<sup>8</sup> In response to specific questions asked by the Authority in notices dated October 28, 2016<sup>9</sup> and February 21, 2017,<sup>10</sup> Supplier Group witnesses offered further pre-filed testimony.<sup>11</sup> On June 7, 2017, the Authority released proposed revisions to the Original Standards and solicited comments and testimony from parties.<sup>12</sup> The Supplier Group once again submitted pre-filed testimony.<sup>13</sup>

4. On July 24, 2017, the Authority conducted an evidentiary hearing.<sup>14</sup> Thereafter, parties filed briefs<sup>15</sup> and reply briefs.<sup>16</sup>

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<sup>4</sup> See, generally, Docket 14-07-20, Decision (Feb. 4, 2015).

<sup>5</sup> See Docket 14-07-20, Motion No. 9 (Mar. 19, 2015).

<sup>6</sup> See Docket 14-07-20, Motion No. 9 Ruling (Mar. 26, 2015). In a separate ruling, PURA confirmed that the Original Standards were stayed pending a final decision in this docket. See Motion No. 1 Ruling (Apr. 15, 2015).

<sup>7</sup> Notice of Request for Written Comments (Apr. 8, 2015).

<sup>8</sup> See, generally, Pre-Filed Testimony (May 8, 2015).

<sup>9</sup> Notice of Request for Written Comments (Oct. 28, 2016).

<sup>10</sup> Second Notice of Request for Written Comments (Feb. 21, 2017).

<sup>11</sup> See, generally, Additional and Updated Pre-Filed Testimony (Dec. 19, 2019); Second Additional and Updated Pre-Filed Testimony (Mar. 7, 2017).

<sup>12</sup> Notice of Request for Written Comments and Hearing (Jun. 7, 2017).

<sup>13</sup> See, generally, Pre-Filed Testimony Regarding the June 7, 2017 Proposed Revisions to the Revised Marketing Standards (Jun. 30, 2017).

<sup>14</sup> See, generally, Hearing Transcript.

5. On January 6, 2020, the Authority issued a Proposed Final Decision.<sup>17</sup> Subsequently, parties filed written exceptions.<sup>18</sup> In response to those written exceptions, the Authority scheduled a hearing for February 20, 2020.<sup>19</sup>

6. RESA's counsel and witness are both unavailable on February 20, 2020. Thus, RESA's requests that the Authority postpone the hearing.

7. Based on the Supplier Group's current availability, RESA requests that the Authority reschedule the hearing to March 2, 3, 16, 17 or 18. If a hearing cannot be held on any of those dates, RESA is happy to work with the Authority's Staff Coordinator to find an alternative date.

### CONCLUSION

For all of the foregoing reasons, RESA respectfully requests that the Authority postpone the hearing in the above-referenced proceeding.

Respectfully Submitted,  
RETAIL ENERGY SUPPLY ASSOCIATION

By:   
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<sup>15</sup> See Brief of George Jepsen, Attorney General of the State of Connecticut (Oct. 11, 2017); Brief of the Office of Consumer Counsel (Oct. 11, 2017); Brief of the Supplier Group (Oct. 11, 2017); Brief of The Connecticut Light and Power Company d/b/a Eversource Energy (Oct. 11, 2017).

<sup>16</sup> See Reply Brief of George Jepsen, Attorney General of the State of Connecticut (Oct. 18, 2017); Reply Brief of the Office of Consumer Counsel (Oct. 18, 2017); Reply Brief of the Supplier Group (Oct. 18, 2017); Reply Brief of The Connecticut Light and Power Company d/b/a Eversource Energy (Oct. 18, 2017).

<sup>17</sup> Proposed Final Decision (Jan. 6, 2020).

<sup>18</sup> See, e.g., Written Exceptions of Retail Energy Supply Association (Jan. 22, 2020).

<sup>19</sup> Notice of Reopened Evidentiary Record and Hearing (Jan. 27, 2020).

**CERTIFICATION**

I hereby certify that a copy of the foregoing was sent to all participants of record on this  
10th day of February 2020.

  
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Joey Lee Miranda