

Via Electronic Filing and Hand Delivery

March 26, 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 Third Set of Interrogatories to the Electric Distribution Companies (RESA-EDC-27 to RESA-EDC-45) in connection with the above-referenced proceeding.

Interrogatories RESA-EDC-27 through RESA-EDC-38 are addressed to both electric distribution companies. Interrogatories RESA-EDC-39 through RESA-EDC-41 are directed only to The Connecticut Light and Power Company d/b/a Eversource Energy. Interrogatories RESA-EDC-42 through RESA-EDC-45 are directed only to The United Illuminating Company.

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.

Robinson+Cole

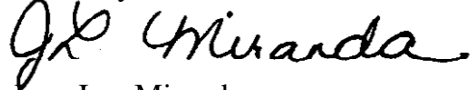
Jeffrey R. Gaudiosi, Esq.

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

Sincerely,

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

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) : MARCH 26, 2019

**RETAIL ENERGY SUPPLY ASSOCIATION'S
THIRD 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 (“Eversource”) and The United Illuminating Company (“UI”) (each, a “Company” and, collectively, the “Companies”) to the following interrogatories in the above-captioned proceeding by *April 9, 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

Interrogatories RESA-EDC-27 to RESA-EDC-38 are directed to both Companies.

- RESA-EDC-27. Are non-hardship residential customers that have entered into amortization agreements with the Company protected from shutoff? If the answer is yes, please describe:
- (a) the period of time (e.g., year round, November 1-May 1, etc.) during which such customers are protected from shutoff of electricity services;
 - (b) how such customers qualify for an amortization agreement; and
 - (c) how the Company knows when such customers are no longer qualified for protection from shutoff of electricity services.
- RESA-EDC-28. What criteria are used to determine if a residential customer is eligible for an amortization agreement? If the criteria vary based on whether the customer is a hardship or non-hardship, please provide the criteria for hardship and non-hardship customers separately.
- RESA-EDC-29. What criteria are used to determine if a residential customer's account is uncollectible? If the criteria vary based on whether the customer is a hardship or non-hardship, please provide the criteria for hardship and non-hardship customers separately.
- RESA-EDC-30. For June and September of each year during the period of 2016 through 2018, please provide the following by rate class (regardless of hardship status):

- (a) The total number of residential customers receiving distribution service from the Company;
- (b) The total number of residential customers receiving Standard Service;
- (c) The percentage of residential customers receiving Standard Service; and
- (d) The total number of residential customers receiving service from an electric supplier.

RESA-EDC-31. For June and September of each year during the period of 2016 through 2018, please provide the following by rate class for hardship customers:

- (a) The total number of residential hardship customers receiving distribution service from the Company;
- (b) The total number of residential hardship customers receiving Standard Service;
- (c) The percentage of residential hardship customers receiving Standard Service; and
- (d) The total number of residential hardship customers receiving service from an electric supplier.

RESA-EDC-32. For June and September of each year during the period of 2016 through 2018, please provide the following by rate class for non-hardship customers:

- (a) The total number of residential non-hardship customers receiving distribution service from the Company;
- (b) The total number of residential non-hardship customers receiving Standard Service;
- (c) The percentage of residential non-hardship customers receiving Standard Service; and
- (d) The total number of residential non-hardship customers receiving service from an electric supplier.

RESA-EDC-33. For June and September of each year during the period of 2016 through 2018, please provide the following for residential customers (regardless of hardship status) separated into the following categories of monthly kilowatt hours (“kWh”) consumption: (1) less than 250 kWh; (2) between 251 and 500 kWh; (3) between 501 and 750 kWh; (4) between 751 and 1000 kWh; and (5) over 1000 kWh:

- (a) The total number of residential customers receiving distribution service from the Company;
- (b) The total number of residential customers receiving Standard Service;
- (c) The percentage of residential customers receiving Standard Service; and
- (d) The total number of residential customers receiving service from an electric supplier.

RESA-EDC-34. For June and September of each year during the period of 2016 through 2018, please provide the following for residential hardship customers separated into the following categories of monthly kWh consumption: (1) less than 250 kWh; (2) between 251 and 500 kWh; (3) between 501 and 750 kWh; (4) between 751 and 1000 kWh; and (5) over 1000 kWh:

- (a) The total number of residential hardship customers receiving distribution service from the Company;
- (b) The total number of residential hardship customers receiving Standard Service;
- (c) The percentage of residential hardship customers receiving Standard Service; and
- (d) The total number of residential hardship customers receiving service from an electric supplier.

RESA-EDC-35. For June and September of each year during the period of 2016 through 2018, please provide the following for residential non-hardship customers separated into the following categories of monthly kWh consumption: (1) less than 250 kWh; (2) between 251 and 500 kWh; (3) between 501 and 750 kWh; (4) between 751 and 1000 kWh; and (5) over 1000 kWh:

- (a) The total number of residential non-hardship customers receiving distribution service from the Company;
- (b) The total number of residential non-hardship customers receiving Standard Service;
- (c) The percentage of residential non-hardship customers receiving Standard Service; and
- (d) The total number of residential non-hardship customers receiving service from an electric supplier.

RESA-EDC-36. Please see Company's response to OCC-3. Using the same format, please provide the same data for the following time periods:

- (a) each month of 2014; and
- (b) for October 2018, November 2018, December 2018 and March 2019. If March 2019 data is not yet available, please provide date on which such data will be available.

RESA-EDC-37. Please see Company's response to OCC-4. Using the same format, please provide the same data for the following time periods:

- (a) each month of 2014; and
- (b) October 2018 through March 2019. If March 2019 data is not yet available, please provide date on which such data will be available.

RESA-EDC-38. For the period of October 2016 through March 2019 (or the most recent month for which data is available), please provide:

- (a) total usage (in kWhs) by month separately for (i) all residential customers; (ii) hardship customers only; and (iii) non-hardship customers only; and
- (b) total capacity obligation (also sometimes referred to as the Installed Capacity Tag or ICAP tag) by month separately for (i) all residential customers; (ii) hardship customers only; and (iii) non-hardship customers only.

Interrogatories RESA-EDC-39 to RESA-EDC-41 are only directed to Eversource.

RESA-EDC-39. Is a residential customer whose income is at or below sixty percent (60%) of the state income guidelines classified as hardship in the Eversource service territory? If the answer is yes, describe:

- (a) how a residential customer establishes that his/her income is at or below sixty percent (60%) of the state income guidelines;
- (b) how often a residential customer must establish that his/her income is at or below sixty percent (60%) of the state income guidelines;
- (c) whether the Company relies on a third-party to determine if a residential customer's income is at or below sixty percent (60%) of the state income guidelines;
- (d) the period of time (e.g., year round, November 1-May 1, etc.), if any, a residential customer whose income is at or below sixty percent (60%) of the state income guidelines is protected from shutoff; and
- (e) how the Company knows when a residential customer's income is no longer at or below sixty percent (60%) of the state income guidelines.

RESA-EDC-40. How did the Company decide that the category of customers identified in its response to RESA-EDC-16(a) should be protected from shutoff of electricity services?

RESA-EDC-41. Please see Company's OCC-04-RV02 response. In Attachment 1, the tab labelled "OCC-4-RV02 h-j" includes data (kWh volumes, pricing and other information) for the Company's hardship customers. Please explain why the total kWh values for 201701, 201707, 201801, and 201807 appear to be abnormally low as compared to other months.

Interrogatories RESA-EDC-42 to RESA-EDC-45 are only directed to UI.

RESA-EDC-42. Are the types of customers identified by Eversource in its response to RESA-EDC-16(a) protected from shutoff of electricity services in the UI service territory? If the answer is yes, describe:

- (a) the period of time (e.g., year round, November 1-May 1, etc.) during which such customers are protected from shutoff of electricity services;
- (b) how such customers qualify for protection from shutoff of electricity services;
- (c) whether the Company relies on a third-party to determine if a residential customer qualifies as the type of customer identified by Eversource in its response to RESA-EDC-16(a);
- (d) how often such customers must establish that they are qualified for protection from shutoff of electricity services; and
- (e) how the Company knows when such customers are no longer qualified for protection from shutoff of electricity services.

RESA-EDC-43. RESA-EDC-11(c) asked about residential customers who are head of household and are unemployed and have household income less than three hundred percent (300%) of the poverty level determined by the federal government. However, in its response, the Company referred to residential customers who are head of household and are unemployed and have household income at or below sixty percent (60%) of the state income guidelines.

- (a) Is a household income less than three hundred percent (300%) of the poverty level determined by the federal government, the same as a household income at or below sixty percent (60%) of the state income guidelines?
- (b) If not, why are customers who are head of household, unemployed customers and have household income at or below sixty percent (60%) of the state income guidelines classified as hardship by the Company?

- (c) If not, does the Company also recognize residential customers who are head of household and are unemployed and have household income less than three hundred percent (300%) of the poverty level determined by the federal government as hardship customers?

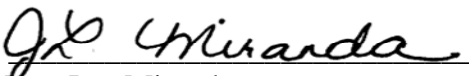
RESA-EDC-44. RESA-EDC-11(e) asked about residential customers whose income has fallen below one hundred twenty-five percent (125%) of the poverty level determined by the federal government. However, in its response, the Company referred to residential customers whose income is at or below sixty percent (60%) of the state income guidelines.

- (a) Is an income below one hundred twenty-five percent (125%) of the poverty level determined by the federal government, the same as an income at or below sixty percent (60%) of the state income guidelines?
- (b) If not, why are customers whose income is at or below sixty percent (60%) of the state income guidelines classified as hardship by the Company?
- (c) If not, does the Company also recognize residential customers whose income has fallen below one hundred twenty-five percent (125%) of the poverty level determined by the federal government as hardship customers?

RESA-EDC-45. RESA-EDC-11(f) asked about residential customers whose circumstances threaten a deprivation of food and the necessities of life for the customers or their dependent children if payment of a delinquent bill is required. However, in its response, the Company referred to residential customers whose income is at or below sixty percent (60%) of the state income guidelines.

- (a) How did the Company determine that residential customers whose income is at or below sixty percent (60%) of the state income guidelines have circumstances that threaten a deprivation of food and the necessities of life for the customers or their dependent children if payment of a delinquent bill is required?
- (b) Does the Company recognize any other residential customers as those whose circumstances threaten a deprivation of food and the necessities of life for the customers or their dependent children if payment of a delinquent bill is required?

Respectfully Submitted,
RETAIL ENERGY SUPPLY
ASSOCIATION

By: 

Joey Lee Miranda
Robinson & Cole LLP
280 Trumbull Street
Hartford, CT 06103
Phone: (860) 275-8200
Fax: (860) 275-8299
E-mail: jmiranda@rc.com

CERTIFICATION

I hereby certify that a copy of the foregoing was sent to all participants of record on this
26th day of March 2019.


Joey Lee Miranda