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*Via Electronic Filing and First Class Mail*

May 10, 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 Motion for Extension of Time to Submit Pre-Filed Testimony 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,



Brian E. Calabrese

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) : MAY 10, 2019

**RETAIL ENERGY SUPPLY ASSOCIATION'S  
MOTION FOR EXTENSION OF TIME  
TO SUBMIT PRE-FILED TESTIMONY**

The Retail Energy Supply Association (“RESA”)<sup>1</sup> requests a one week extension of time until *May 21, 2019* to submit its pre-filed testimony in the above-referenced proceeding. In support of this motion, RESA states:

1. On June 4, 2018, the Authority initiated the instant proceeding to review the feasibility, costs, and benefits of transferring all customers enumerated in Connecticut General Statutes section 16-245o(m) to Standard Service.<sup>2</sup>
2. Subsequently, the Authority established a procedural schedule providing for, among other things, the issuance of and response to interrogatories, pre-filed testimony, hearings, and briefing.<sup>3</sup> Presently, a hearing is scheduled to commence on June 17, 2019.<sup>4</sup>
3. On various dates, since the opening of the instant proceeding, participants have issued and responded to interrogatories.<sup>5</sup> These interrogatories include Interrogatories RESA-

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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> Revised Notice of Proceeding (Feb. 7, 2019), at 1.

<sup>3</sup> See Time Schedule (Date of Last Revision: Apr. 23, 2019).

<sup>4</sup> *Id.*

<sup>5</sup> See, generally, Record.

EDC-34, -36, and -37, to which The Connecticut Light and Power Company d/b/a Eversource Energy (“Eversource”) responded on April 30, 2019.<sup>6</sup>

4. Upon review of Eversource’s responses, RESA noted that certain aspects of these responses were incomplete or required clarification. RESA has spoken with Eversource about these aspects of the responses, and Eversource has indicated that it should be able to provide all of the requested clarifications and, as needed, updated interrogatory responses to address RESA’s concerns by the end of the day today.

5. RESA’s testimony is currently due on Tuesday.<sup>7</sup> While RESA has made significant progress on that testimony, it requires the clarified and updated information from Eversource before it can finish developing its pre-filed testimony.

6. Because the deadline for filing pre-filed testimony is now less than one week away, RESA will not have sufficient time to incorporate the information provided by Eversource in response to Interrogatories RESA-EDC-34, -36, and -37 by the current deadline. Thus, RESA requests that the Authority extend the deadline for the submission of its testimony by one week.

7. The requested extension should not impact the current hearing date as there will still be sufficient time for the participants to issue and respond to discovery before the hearing.<sup>8</sup>

8. The Office of Consumer Counsel has advised the undersigned that it has no objection to the requested extension.

WHEREFORE, RESA respectfully requests that the Authority grant RESA a one week extension of time until *May 21, 2019* to submit its pre-filed testimony in the above-referenced proceeding.

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<sup>6</sup> Eversource response to Interrogatory RESA-EDC-34 (Apr. 30, 2019); Eversource response to Interrogatory RESA-EDC-36 (Apr. 30, 2019); Eversource response to Interrogatory RESA-EDC-37 (Apr. 30, 2019).

<sup>7</sup> See Time Schedule (Date of Last Revision: Apr. 23, 2019).

<sup>8</sup> See *id.*

Respectfully Submitted,  
RETAIL ENERGY SUPPLY  
ASSOCIATION

By: *Brian E. Calabrese*

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**CERTIFICATION**

I hereby certify that a copy of the foregoing was sent to all participants of record on this  
10th day of May 2019.

*Brian E. Calabrese*

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