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*Via Electronic Filing and First Class Mail*

June 18, 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 OCC-44 through OCC-49 in connection with the above-referenced proceeding. Because the attachments to the responses to Interrogatories OCC-44, OCC-45, and OCC-46 could not be accurately reproduced in printed form, they have been provided to the Authority in electronic format only on the enclosed Compact Disc and to those on the service list via electronic mail.

In addition, because the attachments to the responses to Interrogatory OCC-45 and Interrogatory OCC-46 ("E-Bulk Files") exceed the size limit of the Public Utilities Regulatory Authority's ("Authority") Docket Database Web Filing System, those documents were not electronically filed through that system. However, the enclosed Compact Disc contains an electronic version of the E-Bulk Files that can be posted on the Authority's website.

I certify that a copy hereof has been sent to all participants of record as reflected on Authority's 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

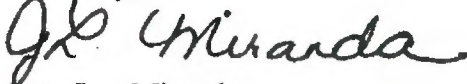
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Please do not hesitate to contact me if you have any questions or require additional information.  
Thank you.

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

Enclosures

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 18, 2019

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OCC-44. Please provide all work papers and source files—in their native, machine-readable format—used in the preparation of the Direct Testimony of Richard J. Hudson Jr. (“Consultant”) on behalf of the Retail Energy Supply Association filed May 21, 2019 in the present docket (“RESA Testimony”).

RESPONSE:

*See* Interrogatory OCC-44, Attachment A through Interrogatory OCC-44, Attachment S. In order to provide the data in its native format and because printing of the attachments does not permit an accurate representation of all of those materials, RESA has only provided the attachments to this response in electronic format.

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OCC-45. Please provide all communications between RESA and its Consultant regarding facts, data, and assumptions provided to the Consultant and used by the Consultant in forming the RESA Testimony.

**OBJECTION:**

RESA objects to this request to the extent it seeks information protected by the work-product doctrine or other applicable privileges and protections. Consistent with the request and the Public Utilities Regulatory Authority's Motion No. 13 Ruling, RESA has only provided "communications between itself and its Consultant regarding . . . facts, data and assumptions provided to the Consultant and used by the Consultant in forming an opinion."

**RESPONSE:**

*See* Interrogatory OCC-45, Attachment A through Interrogatory OCC-45, Attachment AA. To the extent the communications included attachments of materials already available in the record in this proceeding (e.g., discovery responses, etc.), those attachments were not reproduced in response to this request. Because printing of the attachments to this response does not permit an accurate representation of all of those materials, RESA has only provided the attachments in electronic format.

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OCC-46. With the exception of discovery responses already filed in this proceeding, please provide copies of all materials analyzed or reviewed by RESA or its Consultant in conjunction with the preparation of the RESA Testimony.

**OBJECTION:**

RESA objects to this request to the extent it seeks information protected by the work-product doctrine or other applicable privileges and protections. Consistent with the Public Utilities Regulatory Authority's Motion No. 13 Ruling, RESA has only provided "facts, data and assumptions provided to the Consultant and used by the Consultant in forming an opinion."

**RESPONSE:**

*See* Interrogatory OCC-46, Attachment A through Interrogatory OCC-46, Attachment TT; *see also* Responses to Interrogatories OCC-44, OCC-45, and OCC-48 and all footnotes included in the RESA Testimony. I also conducted various online research into supplier product offerings, regulatory filings and decisions, press reports, industry articles, etc. I did not maintain an exhaustive log of all such materials reviewed; however, I did not specifically rely on those materials in forming the opinions presented in the RESA Testimony.

Because printing of the attachments to this response does not permit an accurate representation of all of those materials, RESA has only provided the attachments in electronic format.

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OCC-47. Please indicate whether RESA's Consultant received any assistance from any other person or entity ("assistant") in the preparation of the RESA Testimony. If so, please provide the name(s) and business/professional affiliation(s) of the assistant(s); a description of how the assistant(s) aided in the preparation of the RESA Testimony; and all work papers and source files—in their native, machine-readable format—used by the assistant(s) in preparation of the RESA Testimony.

OBJECTION:

RESA objects to this request to the extent it seeks information protected by the work-product doctrine or other applicable privileges and protections. Consistent with the Public Utilities Regulatory Authority's Motion No. 13 Ruling, RESA has only provided "facts, data and assumptions provided to the Consultant and used by the Consultant in forming an opinion."

RESPONSE:

As noted on page 29 of the RESA Testimony, Exhibit RJH-2 includes information from a report comparing available retail supplier offers to Standard Service rates. This report was produced by Intelometry, Inc. The source file for Exhibit RJH-2 is provided at Interrogatory OCC-44, Attachment E.

Exhibit RJH-4 is a published report authored by the late Phillip R. O'Connor and Muhammad Asad Khan. I do not have access to the source files used by the authors.

I also consulted with representatives of RESA members companies and RESA's counsel regarding the analysis to be included and the topics to be addressed in the RESA Testimony. *See* Response to Interrogatory OCC-45.

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OCC-48. Please provide copies of the documents cited in the RESA Testimony in Footnote 6; Footnote 58; Footnote 59; and Footnote 60.

RESPONSE:

*See* Interrogatory OCC-48, Attachment A through Interrogatory OCC-48, Attachment E.  
The document referenced at footnote 60 is the same document referenced at footnote 58.

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OCC-49. Refer to Exhibit RJH-2. Please confirm whether all of these offered prices were available to all consumers for the time period indicated.

RESPONSE:

Exhibit RJH-2 includes an analysis of available retail offers prepared by Intelometry, a third-party consulting service retained by RESA to produce the report. Although I did not produce the analysis included as Exhibit RJH-2, I am generally familiar with the methodology and source information that was utilized by Intelometry. Upon information and belief, the offers reviewed by Intelometry in the production of this report were residential customer offers taken from the official Connecticut rate board at [www.energizect.com](http://www.energizect.com) ("Rate Board"). It is my understanding that the Rate Board includes "generally available" retail offers. I am unable to confirm that the offers were available to all customers. For instance, I am aware that, at times, certain offers may be restricted to new customers or to customers enrolling online.



CERTIFICATION

I hereby certify that a copy of the foregoing was sent to all participants of record on this  
18th day of June 2019.

  
\_\_\_\_\_  
Joey Lee Miranda