

*Via Electronic Filing and Hand Delivery*

March 22, 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:

Earlier today, Direct Energy Business, LLC and Direct Energy Services, LLC (collectively, “Direct Energy”) requested that the Public Utilities Regulatory Authority (“Authority”) suspend the procedural schedule and convene a status conference in the above-referenced proceeding (“Request”).<sup>1</sup> The Retail Energy Supply Association (“RESA”)<sup>2</sup> hereby files this letter in support of Direct Energy’s Request.

As Direct Energy noted, less than one (1) month ago, the Office of Consumer Counsel (“OCC”) submitted lengthy pre-filed testimony. In addition, RESA only received the electric distribution companies’ (“EDCs”) responses to both its first and second set of interrogatories last week. The current schedule simply does not provide sufficient time for RESA to finish analyzing both the OCC pre-filed testimony and the discovery responses received thus far and to determine if additional discovery is necessary or to prepare its pre-filed testimony by the current deadline. For

<sup>1</sup> Motion No. 11 (Mar. 22, 2019).

<sup>2</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).

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instance, the participants need an adequate opportunity to analyze the significant Standard Service residential rate increases<sup>3</sup> that went into effect earlier this year to ensure the Authority understands the full impact of any decision that would return hardship customers to Standard Service. Thus, RESA supports Direct Energy's Request and urges the Authority to suspend the procedural schedule and convene a status conference.

I certify that a copy hereof has been sent to all participants of record as reflected on the 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.

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

Sincerely,

  
Joey Lee Miranda

Copy to:      Service List

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<sup>3</sup> See, e.g., Response of The Connecticut Light and Power Company d/b/a Eversource Energy ("Eversource") to RSA-EDC-8, Attachment 1 (showing a 18.9% increase in Eversource Standard Service rates for Rate 1 & Rate 5 customers as of January 1, 2019); Response of The United Illuminating Company ("UI") to RSA-EDC-8 (showing a 24% increase in UI Standard Service rate for Rate R customers as of January 1, 2019).