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*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 Office of Consumer Counsel (RESA-OCC-8 to RESA-OCC-19) 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,

  
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 OFFICE OF CONSUMER COUNSEL**

The Retail Energy Supply Association (“RESA”) requests responses from The Office of Consumer Counsel (“OCC”) 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 OCC 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 OCC's initial responses to these interrogatories, OCC discovers additional or new material or information responsive to any interrogatory, or that any response provided therein was totally or partially incorrect or, though correction was made, a response is no longer true, OCC must promptly file supplemented and/or corrected responses.

### DEFINITIONS

As used in these Interrogatories:

1. "OCC" means the Office of Consumer Counsel and its employees, agents, and consultants. Each reference to OCC shall be interpreted to include any, all, or any grouping or subgrouping of persons and entities in the foregoing enumeration as needed to make the reference inclusive and not exclusive.

2. "Consultant" means Susan M. Baldwin and her employees, agents, and consultants. Each reference to Consultant shall be interpreted to include any, all, or any grouping or subgrouping of persons and entities in the foregoing enumeration as needed to make the reference inclusive and not exclusive.

3. "Any" shall include "all," and "all" shall include "any," as needed to make the request inclusive and not exclusive.

4. "And" shall include "or," and "or" shall include "and," as needed to make the request inclusive and not exclusive.

5. "Include" and "including" mean "including without limitation," as needed to make the request inclusive and not exclusive.

6. "Communications" means all materials and tangible forms of expression in the OCC's or its Consultant's possession, custody or control, whether drafts or unfinished versions, originals or nonconforming copies thereof, however, or by whomever prepared, created, produced, maintained, used, sent, received, dated, or stored (manually, mechanically, electronically or otherwise), including books, papers, records, files, notes, e-mails, text messages, instant messages, bulletins, personal digital assistants (PDAs), smartphones (e.g., "Blackberry," "iPhone," "Droid") and other mobile electronic devices, or other electronic, social or industrial web-based media (e.g., Facebook®, Twitter®, LinkedIn®) within the OCC's or its Consultant's control, letters, chronologies, charts, studies, graphs, computer printouts, receipts, schedules, itineraries, declarations, affirmations, affidavits, deposition transcripts or other sworn, affirmed or unsworn statements, scripts, press releases, minutes, summaries, analyses, correspondence, memoranda, work papers, ledger sheets, confirmations, cables, wires, telecopies, facsimiles, telegrams, telexes, telephone logs, notes or records of conversations or meetings, contracts, agreements, notices, advertisements and including all metadata in all electronic documents.

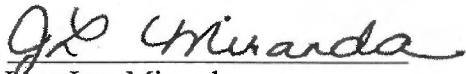
### INTERROGATORIES

- RESA-OCC-8. Please provide all workpapers and source files (in their native format) used to prepare the February 27, 2019 Direct Testimony of Susan M. Baldwin on Behalf of the Office of Consumer Counsel ("OCC Testimony").
- RESA-OCC-9. Please provide copies of all materials (except discovery responses filed in this proceeding) reviewed or analyzed by the OCC or its Consultant in connection with the preparation of the OCC Testimony.
- RESA-OCC-10. Please provide copies of all communications between the OCC and its Consultant regarding the OCC Testimony or this proceeding, including without limitation, any instructions provided by the OCC to the Consultant. If any communications were verbal, please provide the name(s) of all persons involved in such communications, the date(s) of such communications, and copies of any notes from such communications.

- RESA-OCC-11. Did anyone assist the Consultant with the preparation of the OCC Testimony?  
If the answer is yes:
- (a) provide the name(s) and business affiliation(s) of anyone who assisted in the preparation of the OCC Testimony;
  - (b) describe how each person identified in response to (a) assisted in the preparation of the OCC Testimony; and
  - (c) provide all workpapers and source files (in their native format) used by the person(s) identified in response to (a).
- RESA-OCC-12. Did the OCC or its Consultant review or analyze data for time periods other than October 2016 – September 2018? If yes, please provide copies of any analysis, any and all materials (except discovery responses filed in this proceeding) reviewed or analyzed, and any and all workpapers and source files (in their native format).
- RESA-OCC-13. Did the OCC or its Consultant interview any customers in connection with this proceeding or the OCC Testimony? If yes, please provide copies of any and all interview questions and answers, notes about such interviews, and communications about such interviews.
- RESA-OCC-14. Did the OCC or its Consultant conduct any surveys in connection with this proceeding or the OCC Testimony? If yes, please provide copies of any and all surveys, survey responses, and communications about such surveys.
- RESA-OCC-15. OCC Testimony, at 2: Please provide all workpapers and source files (in their native format) used to prepare: “Are Consumers Benefiting from Competition? An Analysis of the Individual Residential Electric Supply Market in Massachusetts,” Susan M. Baldwin, prepared for the Massachusetts Attorney General’s Office, March 29, 2018 (“MA AG Report”).
- RESA-OCC-16. Please provide copies of all communications between the OCC or its Consultant and the Massachusetts Attorney General’s Office regarding this proceeding, the OCC Testimony or the MA AG Report.
- RESA-OCC-17. OCC Testimony, at 2: Please provide all workpapers and source files (in their native format) used to prepare: “Maryland’s Residential Electric and Gas Supply Markets: Where Do We Go from Here?” Susan M. Baldwin and Sarah M. Bosley, prepared for the Maryland Office of People’s Counsel, November 2018 (“MD OPC Report”).
- RESA-OCC-18. Please provide copies of all communications between the OCC or its Consultant and the Maryland Office of People’s Counsel regarding this proceeding, the OCC Testimony or the MD OPC Report.

RESA-OCC-19. Has there been any update to OCC Testimony, Attachment A (Statement of Qualifications of Susan M. Baldwin) since the OCC Testimony was submitted? If so, please provide an updated Attachment A.

Respectfully Submitted,  
RETAIL ENERGY SUPPLY  
ASSOCIATION

By: 

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**CERTIFICATION**

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

  
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Joey Lee Miranda