

**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- :  
245o(m) : AUGUST 14, 2019

**REVISIONS TO  
TESTIMONY OF RICHARD J. HUDSON, JR.  
ON BEHALF OF RETAIL ENERGY SUPPLY ASSOCIATION**

The Retail Energy Supply Association (“RESA”)<sup>1</sup> hereby submits revisions to the Testimony of Richard J. Hudson, Jr. on Behalf of Retail Energy Supply Association<sup>2</sup> in connection with the above-captioned proceeding.

**BACKGROUND**

On June 4, 2018, the Authority initiated the instant proceeding to review the feasibility, costs, and benefits of transferring to Standard Service all supplier customers specifically enumerated in Connecticut General Statutes section 16-245o(m) (“Hardship Customers”).<sup>3</sup> Throughout the course of this proceeding, The Connecticut Light and Power Company d/b/a Eversource Energy (“Eversource”) and The United Illuminating Company (“UI”) (collectively, the “electric distribution companies” or “EDCs”) responded to various discovery, including providing information about Standard Service rates, prices billed by electric suppliers, and the

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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> Testimony of Richard J. Hudson, Jr. on Behalf of Retail Energy Supply Association (May 21, 2019) (“RESA Testimony”).

<sup>3</sup> Revised Notice of Proceeding (Feb. 7, 2019) (“Revised Notice of Proceeding”), at 1.

number of Hardship Customers served by suppliers at specific points in time.<sup>4</sup> However, the EDCs discovery responses contained errors.<sup>5</sup>

Both the Office of Consumer Counsel and RESA relied upon the information provided in the EDCs' discovery responses in preparing their pre-filed testimony.<sup>6</sup> While RESA questioned the validity of the data and pointed out errors in the information provided,<sup>7</sup> the OCC relied upon the EDCs' discovery responses without question or inquiry into the accuracy of the data.<sup>8</sup>

The EDCs subsequently admitted that their discovery responses included errors<sup>9</sup> and, in response to a request from RESA,<sup>10</sup> filed corrected discovery responses.<sup>11</sup> As a result of those corrections, RESA now hereby submits corresponding revisions to the RESA Testimony (collectively, the "Testimony Revisions").

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<sup>4</sup> See, e.g., UI Interrogatory OCC-3 Response (Nov. 26, 2018); UI Interrogatory OCC-4 Response (Nov. 26, 2018); Eversource Interrogatory OCC-3 Response (Nov. 27, 2018); Eversource Interrogatory OCC-4 Response (Nov. 27, 2018); Eversource Interrogatory OCC-3 Revised Response (Dec. 12, 2018); Eversource Interrogatory OCC-4 Revised Response (Dec. 12, 2018); Eversource Interrogatory OCC-4 Second Revised Response (Jan. 2, 2019); UI Interrogatory RESA-EDC-36 Response (Apr. 30, 2019); UI Interrogatory RESA-EDC-37 Response (Apr. 30, 2019); Eversource Interrogatory RESA-EDC-36 Response (Apr. 30, 2019); Eversource Interrogatory RESA-EDC-37 Response (Apr. 30, 2019); Eversource Interrogatory RESA-EDC-36 Revised Response (May 14, 2019); Eversource Interrogatory RESA-EDC-37 Revised Response (May 14, 2019).

<sup>5</sup> See, e.g., Retail Energy Supply Association's Motion for Extension of Time to Submit Pre-Filed Testimony (May 10, 2019) (Motion No. 020), at 2 (noting that certain aspects of Eversource's Responses to Interrogatories RESA-EDC-34, -36, and -37 "were incomplete or required clarification"); RESA Testimony, at 17-19 (identifying data inconsistencies or anomalies in source data provided by the EDCs).

<sup>6</sup> See, e.g., Direct Testimony of Susan M. Baldwin on Behalf of the Office of Consumer Counsel (Feb. 27, 2019) ("OCC Testimony"), at 15 n.18 ("In Sections III and IV of my testimony, the source of my data analysis is the following unless otherwise noted: OCC-003 (non-hardship data), OCC-004 (hardship data), and OCC-011 (EDC prices)."); RESA Testimony, at 15-16 (identifying source data for Tables RJH-A and RJH-B as EDC Responses to RESA-EDC-37).

<sup>7</sup> See, e.g., Retail Energy Supply Association's Motion for Extension of Time to Submit Pre-Filed Testimony (May 10, 2019) (Motion No. 020), at 2 (noting that certain aspects of Eversource's responses to Interrogatories RESA-EDC-34, -36, and -37 "were incomplete or required clarification"); RESA Testimony, at 17-19 (identifying data inconsistencies or anomalies in source data provided by the EDCs).

<sup>8</sup> Hearing Transcript ("Tr."), at 213-14 (OCC witness admitting that she did not audit EDC data and had no way of knowing if data was accurate).

<sup>9</sup> See, e.g., Eversource Interrogatory SEU-6 Response (Jun. 13, 2019); UI Interrogatory SEU-6 Response (Jun. 11, 2019).

<sup>10</sup> Tr. at 161-64, 205-06.

<sup>11</sup> See UI Interrogatory OCC-13 Revised Response (Aug. 1, 2019); UI Interrogatory RESA-EDC-37 Revised Response (Aug. 1, 2019); Eversource Interrogatory RESA-EDC-36 Revised Response (Aug. 8, 2019); Eversource Interrogatory RESA-EDC-37 Revised Response (Aug. 8, 2019).

## TESTIMONY REVISIONS<sup>12</sup>

1. The following Table RJH-A (Revised) should be substituted for Table RJH-A on Page 15, Line 12 of the RESA Testimony:

<b>Table RJH-A (Revised)</b>				
<b>UI December 2018 to March 2019 Supplier Prices Below January to June 2019 Standard Service Rate</b>				
	<b>Dec-18</b>	<b>Jan-19</b>	<b>Feb-19</b>	<b>Mar-19</b>
Total Supplier Hardship Customer Bills	<u>7814</u>	<u>7179</u>	<u>7435</u>	<u>6788</u>
# of Hardship Supplier Customer Billed Prices Below Jan to June 2019 Standard Service Rate	<u>4530</u>	<u>3758</u>	<u>3744</u>	<u>3214</u>
% of Hardship Supplier Customer Billed Prices Below Jan to June 2019 Standard Service Rate	<u>58.0%</u>	<u>52.3%</u>	<u>50.4%</u>	<u>47.3%</u>
Source: UI Response to RESA-EDC-037 (corrected August 1, 2019)				

2. The text on Page 15, Lines 7-9 of the RESA Testimony should be revised to read: “Notably, between 47.3 percent and 58.0 percent of the supplier billed prices for UI hardship customers were lower than the January to June 2019 standard service rate.”

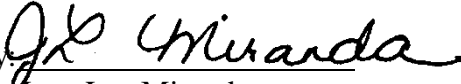
3. The text on Page 17, Lines 1-5 of the RESA Testimony should be revised to read: “For example, had this policy been in place during March 2019, 10,300 hardship customers, which represents 40.5 percent of the hardship customers served by suppliers statewide, who benefited from lower-priced supplier options that they affirmatively selected, would have been restricted to higher standard service rates.”

The Testimony Revisions do not change the conclusions reached by Mr. Hudson in the RESA Testimony or during Mr. Hudson’s live testimony presented at the July 17, 2019 hearing.

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<sup>12</sup> Revisions denoted by double underlined text.

Respectfully Submitted,  
RETAIL ENERGY SUPPLY  
ASSOCIATION

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**CERTIFICATION**

I hereby certify that a copy of the foregoing was sent to all participants of record on this  
14th day of August 2019.

  
Joey Lee Miranda