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Also admitted in District of
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Via Electronic Filing and First Class Mail

October 10, 2012

Kimberley J. Santopietro
Executive Secretary
Public Utilities Regulatory Authority
10 Franklin Square
New Britain, CT 06051

Re: **Docket No. 12-06-14: PURA Investigation into the Creation and Expansion
of Municipal Electric Utilities**

Dear Ms. Santopietro:

Enclosed please find the Retail Energy Supply Association Request for Participant Status and the Comments of the Retail Energy Supply Association in connection with the above-referenced matter.

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.

Very truly yours,



Joey Lee Miranda

Enclosures

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PUBLIC UTILITIES REGULATORY AUTHORITY

PURA INVESTIGATION INTO THE : DOCKET NO. 12-06-14
CREATION AND EXPANSION OF :
MUNICIPAL ELECTRIC UTILITIES : OCTOBER 10, 2012

RETAIL ENERGY SUPPLY ASSOCIATION
REQUEST FOR PARTICIPANT STATUS

The Retail Energy Supply Association (“RESA”)¹ hereby petitions the Connecticut Public Utilities Regulatory Authority (“Authority” or “PURA”) to be designated as a participant in the above-captioned proceeding. In support of this petition, RESA states as follows:

1. Special Act 12-8, *An Act Concerning the Creation and Expansion of Municipal Electric Utilities* (the “Act”), requires the Authority to examine the procedures for creating and expanding municipal electric utilities and to report its findings to the General Assembly.² In such report, the Authority is required to “identify (1) all procedures necessary for a municipality to establish or expand a municipal electric utility, and (2) any statutory changes necessary to enable a municipality to implement or initiate such procedures.”³

2. In response to the requirements of the Act, the Authority, on its own motion, opened this proceeding.⁴ Subsequently, the Authority issued a Notice of Request for Written

¹ RESA’s members include: Champion Energy Services, LLC; ConEdison *Solutions*; Constellation NewEnergy, Inc.; Direct Energy Services, LLC; Energetix, Inc.; Energy Plus Holdings LLC; Exelon Energy Company; GDF SUEZ Energy Resources NA, Inc.; Green Mountain Energy Company; Hess Corporation; Integrys Energy Services, Inc.; Just Energy; Liberty Power; MC Squared Energy Services, LLC; Mint Energy, LLC; NextEra Energy Services; Noble Americas Energy Solutions LLC; PPL EnergyPlus, LLC; Reliant; Stream Energy; TransCanada Power Marketing Ltd. and TriEagle Energy, L.P.. The comments expressed in this filing represent the position of RESA as an organization but may not represent the views of any particular member of RESA.

² S.A. 12-8.

³ *Id.*

⁴ See Request to Establish a New Docket on PURA’s Own Motion, dated June 19, 2012.

Comments offering interested persons an opportunity to submit comments on specified topics, including “the legal and practical implications of a municipality seeking expansion into current Connecticut Light & Power Company or United Illuminating Company service territory.”⁵

3. RESA is a non-profit organization and trade association that represents the interests of its members in regulatory proceedings in the Mid-Atlantic, Great Lakes, New York and New England regions. RESA members are active participants in the retail competitive markets for electricity, including the Connecticut retail electric market.

4. Currently, the service areas of both The Connecticut Light and Power Company (“CL&P”) and The United Illuminating Company (“UI”) are open to retail electric competition.⁶ However, the service areas of municipal electric utilities are not unless the municipal utility has been authorized by the Authority to be a “participating municipal electric utility,” as defined in Connecticut General Statutes section 16-1.⁷

5. Several RESA member companies are licensed by the Authority to serve residential, commercial and industrial customers in Connecticut and are presently providing electricity service to customers in the CL&P and/or UI service areas. Because the Authority’s report resulting from this proceeding is required to examine the potential for creating and expanding municipal electric utilities and to suggest statutory changes to enable such creation and/or expansion, it has the potential to alter the availability of retail customer choice in Connecticut. Thus, RESA and its members have a substantial and specific interest in ensuring that the Authority’s decision does not have an adverse effect on RESA members, their customers or the continued success of retail electric competition in Connecticut.

⁵ See Notice of Request for Written Comments, dated September 26, 2012 (“Notice”), at 1.

⁶ See Conn. Gen. Stat. § 16-244b.

⁷ Cf. Conn. Gen. Stat. § 16-245c.

6. RESA has not yet determined the full extent of its participation in this docket and reserves the right to fully participate, including through participation in any hearings convened by the Authority, submission of written comments, briefs and/or written exceptions, and participation in oral argument.

7. Correspondence and other communication in regard to this matter should be served upon the following:

Joey Lee Miranda, Esq.
Robinson & Cole LLP
280 Trumbull Street
Hartford, CT 06103
(860) 275-8200 (office)
(860) 275-8299 (fax)
jmiranda@rc.com (e-mail)

WHEREFORE, for the foregoing reasons, RESA requests that it be designated a participant in this proceeding.

Respectfully submitted,
RETAIL ENERGY SUPPLY ASSOCIATION



By: _____

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CERTIFICATION

I hereby certify that a copy of the foregoing was sent via electronic mail or first-class mail, postage pre-paid to all participants of record, on this 10th day of October 2012.

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