

Via Electronic Filing

September 1, 2020

Jeffrey R. Gaudiosi, Esq.
Executive Secretary
Public Utilities Regulatory Authority
10 Franklin Square
New Britain, CT 06051

Re: Docket No. 20-01-01: Administrative Proceeding to Review The Connecticut Light and Power Company's Standard Service and Supplier of Last Resort Service 2020 Procurement Results and Rates


Dear Mr. Gaudiosi:

Provided herewith please find Retail Energy Supply Association's Motion for Participant Status 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 ("PURA's") service list. In accordance with PURA's instructions, I am filing "only an electronic copy through the PURA Web Filing System."¹

Please do not hesitate to contact me if you have any questions. Thank you.

Sincerely,


Brian E. Calabrese

Copy to: Service List

Attachment

¹ See Fifth Ruling on Temporarily Suspending Filing Paper Copies (Jun. 19, 2020).

STATE OF CONNECTICUT

PUBLIC UTILITIES REGULATORY AUTHORITY

ADMINISTRATIVE PROCEEDING TO : DOCKET NO. 20-01-01
REVIEW THE CONNECTICUT LIGHT :
AND POWER COMPANY'S :
STANDARD SERVICE AND SUPPLIER :
OF LAST RESORT SERVICE 2020 :
PROCUREMENT RESULTS AND :
RATES : SEPTEMBER 1, 2020

**RETAIL ENERGY SUPPLY ASSOCIATION'S
MOTION FOR PARTICIPANT STATUS**

The Retail Energy Supply Association (“RESA”)¹ hereby moves the Public Utilities Regulatory Authority (the “Authority”) for participant status.

BACKGROUND

The Authority opened the instant docket to review procurement results and to consider approval of The Connecticut Light and Power Company d/b/a Eversource Energy’s (“Eversource’s”) proposed Standard Service and Last Resort Service rates.²

On May 1, 2020, Eversource made a filing to establish Standard Service and Last Resort Service Rates to be effective July 1, 2020.³ In the May 1, 2020 Rate Filing, however, Eversource described only the July 1, 2020 changes to the supply rates (i.e., the Generation Service Charge and Bypassable Federally Mandated Congestion Charge rates for Standard Service and Last Resort Service).⁴ Eversource indicated that it had not then determined the Non-Bypassable

¹ 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.

² Notice of Proceeding (Jan. 15, 2020).

³ Proceeding to Establish Total July 1, 2020 Rates (May 1, 2020) (“May 1, 2020 Rate Filing”).

⁴ May 1, 2020 Rate Filing, at 5.

Federally Mandated Congestion Charge (“NBFMCC”) rate, the Transmission Adjustment Clause (“TAC”) rate, the Electric System Improvements (“ESI”) tracker adjustment, or the revenue decoupling mechanism (“RDM”) adjustment.⁵ Eversource indicated that since all of the delivery service rate components that would change on July 1, 2020 were not then available, they would be identified in a supplemental filing in this docket on or before June 15, 2020.⁶ On May 7, 2020, the Authority approved Eversource’s proposed changes to its supply rates (i.e., the Generation Service Charge and Bypassable Federally Mandated Congestion Charge rates for Standard Service and Last Resort Service).⁷ The Authority indicated that it would address Eversource’s subsequent filing separately.⁸

On June 19, 2020, Eversource made a filing to establish total Standard Service and Last Resort Service rates to be effective July 1, 2019.⁹ Among other things, the June 19, 2020 Rate Filing reflected TAC, NBFMCC, and RDM increases, as well as the ESI adjustment.¹⁰ The NBFMCC rate increase was driven primarily by payments associated with power purchase agreements for the Millstone Nuclear Power Plant (“Millstone”).¹¹ The Authority approved Eversource’s proposed TAC, NBFMCC, ESI, and RDM rates for billing effective July 1, 2020, subject to approval in the applicable rate adjustment mechanisms docket.¹²

⁵ May 1, 2020 Rate Filing, at 6.

⁶ *See id.* at 1.

⁷ *See* Authority Correspondence (May 7, 2020), at 4.

⁸ *Id.*

⁹ Proceeding to Establish Total July 1, 2020 Rates (Jun. 19, 2020) (“June 19, 2020 Rate Filing”).

¹⁰ *See* June 19, 2020 Rate Filing, at 5-6.

¹¹ *See id.*, at 2; *see also* Eversource Response to Interrogatory AG-2 (Aug. 13, 2020); *cf.* Docket No. 18-05-04, *PURA Implementation of June Special Session Public Act 17-3*, Second Interim Decision (Sept. 18, 2019).

¹² *See* Authority Correspondence (Jun. 26, 2020), at 2-3.

On July 31, 2020, the Authority issued correspondence to Eversource.¹³ The Authority noted that, owing to the convergence of a number of events, including the July 1, 2020 administrative adjustment to certain delivery rate components, the COVID-19 pandemic and its corresponding effect on customer energy usage, as well as the higher than normal temperatures, Eversource customers received higher than anticipated electric bills.¹⁴ Consequently, the Authority stated that it would reexamine the administrative changes to the energy and transmission adjustment clauses approved for billing by its June 26, 2020 correspondence.¹⁵ Further, as an interim step, the Authority temporarily suspended its June 26, 2020 approval and ordered Eversource to use the RDM, TAC, NBFMCC, and ESI charges in effect prior to the Authority's June 26, 2020 approval letter.¹⁶ The Authority also scheduled a hearing to reexamine the suspended administrative adjustments.¹⁷ On August 24, 2020, the Authority held this hearing.¹⁸

Following the hearing, the Authority requested briefs on certain topics.¹⁹ Among these topics is the following: Whether Connecticut General Statutes section 16a-3m "dictates the EDCs' [Electric Distribution Companies'] disposition of Millstone generated energy, specifically addressing whether the sale of Millstone generated energy directly to standard service customers is prohibited and whether the statute defines what constitutes the 'net costs' of the PPAs."

Intending to file a brief on this issue, RESA moves for participant status.

¹³ See Authority Correspondence (Jul. 31, 2020).

¹⁴ See *id.* at 1.

¹⁵ *Id.*

¹⁶ *Id.*

¹⁷ See Notice of Hearing (Jul. 31, 2020).

¹⁸ See Hearing Recording (available at <https://ct-n.com/ctnplayer.asp?odID=17624>) (last visited Sept. 1, 2020).

¹⁹ See Notice of Request for Briefs (Aug. 25, 2020).

ARGUMENT

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.

Several RESA member companies are licensed by the Authority to serve customers in Connecticut and are presently providing electricity service to Connecticut customers. Some of these customers receive distribution service from Eversource and make choices about whether to enroll with RESA member companies in part based on the level of, and the amount of volatility in, Standard Service rates. These member companies would be affected directly if any such distribution customers of Eversource switch to Standard Service because Millstone generated energy is included directly in Standard Service. Comparably, these member companies would be directly affected if they have additional opportunities to obtain customers because the inclusion of Millstone generated energy causes distribution customers to evaluate options for switching generation supply service from Standard Service to competitive supply. More broadly, including the Millstone generated energy in Standard Service will cause RESA member companies participating in the Connecticut electric supply market to review and update their business strategies to ensure that their products continue to compete favorably with Standard Service. Thus, RESA members will be substantially and specifically affected by any action that the Authority takes with respect to including Millstone generated energy in Standard Service. RESA, therefore, requests that it be designated a participant in this proceeding.

RESA has not yet determined the full extent of its participation in this docket and reserves the right to participate fully in this proceeding, including through participation in any

technical meetings or hearings convened by the Authority, submission of written comments, briefs and/or written exceptions, and participation in oral argument. Correspondence and other communication in regard to this matter should be served upon the following:

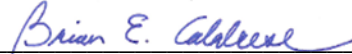
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CONCLUSION

For all the foregoing reasons, the Authority should grant RESA participant status.

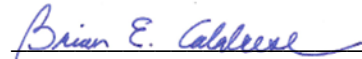
Respectfully submitted,
RETAIL ENERGY SUPPLY
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CERTIFICATION

I certify that a copy of the foregoing was sent to all participants of record on this 1st day of September 2020.



Brian E. Calabrese