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August 3, 2012

Ms. Karen Geraghty
Administrative Director
Maine Public Utilities Commission
18 State House Station
Augusta, ME 04333-0018

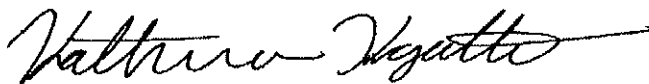
**Re: Docket No. 2012-321: MAINE PUBLIC UTILITIES COMMISSION
Inquiry into Transparency in Electric Rates and Assessments**

Dear Ms. Geraghty:

Enclosed please find the original and one copy of the Comments of Retail Energy Supply Association in connection with the above-referenced matter.

Please feel free to contact me if you have any questions or require additional information. Thank you.

Sincerely,



Katherine S. Kayatta

Enclosures

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August 3, 2012

MAINE PUBLIC UTILITIES COMMISSION
Inquiry into Transparency in Electric Rates
and Assessments

COMMENTS OF RETAIL
ENERGY SUPPLY
ASSOCIATION

The Retail Energy Supply Association (“RESA”)¹ hereby submits its comments in response to the Public Utilities Commission’s (“Commission”) July 13, 2012 Notice of Inquiry (“Notice”) in connection with the above-referenced matter.

BACKGROUND

During its 2012 session, the Legislature enacted An Act to Provide Transparency in Electricity Pricing for Maine Ratepayers (the “Act”).² Section 4 of the Act provides:

The Public Utilities Commission shall develop information useful to electricity ratepayers regarding the costs and effects of state policies on electricity ratepayers. The commission and the Office of the Public Advocate shall post the information on their publicly accessible websites. The commission shall also examine means by which transmission and distribution utilities may inform customers of the information developed and posted by the commission. The commission shall report on its actions under this section together with any recommendations to the joint standing committee of the Legislature having jurisdiction over energy, utilities and technology matters by February 15, 2013.

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 P.L. 2011, ch. 590.

In response, the Commission issued the Notice. In the Notice, the Commission invited interested parties to comment on specific questions as well as on any other relevant issues.³

RESA hereby submits its comments in response to the Notice.

COMMENTS

RESA is a nonprofit organization and trade association that represents the interests of its members in regulatory proceedings. RESA's members include providers of competitive electric supply products to customers in the five restructured New England states, including Maine. RESA appreciates the Commission undertaking this review and the opportunity to provide these comments.

Cost Items

The Notice sets forth various rate components and charges for inclusion on the Commission's website.⁴ Generally, customers deserve to understand the various portions of their electric rates and charges in a clear way that allows them to make informed decisions. It is particularly important that customers understand which portion of their electric rates and charges are regulated and unavoidable and which portion of their electric rates and charges are shoppable (i.e., can be avoided if a customer selects a competitive energy provider). Thus, RESA supports the inclusion of a description of *all* components included within each customer rate and/or charge and an explanation of whether such rates and/or charges are shoppable. To this end, the Commission should ensure that any narrative explanation and/or visual aids provided to customers clearly delineate which rates and charges are subject to competition.

However, RESA recommends that the Commission refrain from including quantifications of non-monetary and/or intangible benefits associated with the various cost components as such

³ Notice at 1-3.

⁴ Notice at 2.

quantifications would necessarily be based on subjective criteria, assumptions, uncontrollable variables within the marketplace and future forecasts. As a result, such quantifications would be speculative, would not provide meaningful information to consumers and would only serve to confuse (rather than inform) consumers.

Information Presentation

RESA supports the presentation of the information to customers in both a narrative fashion that describes the various items that appear on their electric bills and the components and costs associated with each item ***and*** through diverse visual formats, including graphs, tables and/or pie charts (as appropriate) to assist customers in understanding the magnitude of the various rates and charges both individually and relative to their entire cost of electricity. Further, the Commission should ensure that both any narrative explanation and/or visual aids provided to customers clearly delineate which rates and charges are subject to competition.

While RESA believes it is possible to prepare a narrative explanation of the various rates and charges that would be the same for all utilities and rate classes, in order to provide meaningful information to customers, it is important that any narrative information or visual aids depicting information about the magnitude of the various rates and charges capture that information as it pertains to each individual utility.

Further, to the extent there are significant variations in the information among rate classes, RESA would support displaying the information on a per rate class basis. However, if the information does not vary substantially among rate classes, to avoid confusion and information overload, RESA would recommend that the information be presented on an aggregate basis for all rate classes. Lastly, to ensure consistency, the same information in the

same format should be presented across the various outlets (i.e., the Commission's website, the Office of the Public Advocate's website and the various utilities' websites).

Cost Development Process

The Notice outlines a potential approach for developing cost information related to the various rates and charges.⁵ RESA generally supports this approach to the extent such information is based on quantifiable and easily verifiable information. However, as discussed above, to avoid customer confusion, RESA recommends that the Commission refrain from including quantifications of non-monetary and/or intangible benefits associated with the various cost components.

Utility Provided Information

To ensure consistency, the same information (with variations as appropriate for each utility) in the same format should be presented across the various outlets, including the websites of the investor-owned utilities *and* the consumer-owned utilities. RESA also supports providing the information to customers on an annual basis as a bill insert. However, RESA would urge the Commission not to require inclusion of the information on customers' bills as it is unlikely that there is enough room on the bill itself to present the myriad of information necessary for customers to fully comprehend the information and providing only portions of the information without the necessary context would likely only serve to confuse (rather than inform) customers.

CONCLUSION

RESA appreciates the opportunity to submit these comments and looks forward to discussing these issues in more detail during the course of this proceeding.

⁵ Notice at 3.

Respectfully submitted,
RETAIL ENERGY SUPPLY ASSOCIATION

By:



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