

*Via Electronic Filing*

September 17, 2020

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

**Re: Docket No. 20-01-02: Administrative Proceeding to Review The United Illuminating 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."<sup>1</sup>

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

Sincerely,

  
Brian E. Calabrese

Copy to: Service List

Attachment

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

**STATE OF CONNECTICUT**

**PUBLIC UTILITIES REGULATORY AUTHORITY**

ADMINISTRATIVE PROCEEDING TO : DOCKET NO. 20-01-02  
REVIEW THE UNITED :  
ILLUMINATING COMPANY'S :  
STANDARD SERVICE AND SUPPLIER :  
OF LAST RESORT SERVICE 2020 :  
PROCUREMENT RESULTS AND :  
RATES : SEPTEMBER 17, 2020

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

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

**BACKGROUND**

The Authority opened the instant docket to review procurement results and to consider approval of The United Illuminating Company’s (“UI”) proposed Standard Service and Last Resort Service rates.<sup>2</sup> On May 1, 2020, UI filed for approval of its supply rates (i.e., the Generation Service Charge and Bypassable Federally Mandated Congestion Charge rates for Standard Service and Last Resort Service) to be effective July 1, 2020.<sup>3</sup> On May 11, 2020, the Authority approved UI’s proposed changes to its supply rates.<sup>4</sup>

On July 21, 2020, UI filed for approval of an increase in its transmission (“TRA”) and nonbypassable federally mandated congestion charge (“NBFMCC”) rates to be effective August

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

<sup>3</sup> UI Compliance Filing (May 1, 2020) (“May 1 Rate Filing”).

<sup>4</sup> See Authority Correspondence (May 11, 2020), at 3.

1, 2020.<sup>5</sup> The NBFMCC rate increase was driven primarily by payments associated with power purchase agreements (“PPAs”) for the Millstone Nuclear Power Station (“Millstone”).<sup>6</sup> The Authority held a hearing to consider UI’s proposed increases on September 4, 2020.<sup>7</sup>

Following the hearing, the Authority requested briefs on several topics,<sup>8</sup> including 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.”<sup>9</sup> RESA now hereby moves for participant status.

### **MOTION**

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 UI and make choices about whether to enroll with RESA member companies, in part, based on the level of, and the amount of volatility in,

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<sup>5</sup> Motion No. 2 (Jul. 21, 2020) (“Motion No. 2”). UI also submitted these rates as a compliance filing in the instant docket and as a compliance filing and as a motion (Motion No. 5) in Docket No. 20-03-02, *PURA Annual Review of the Rate Adjustment Mechanisms of The United Illuminating Company*.

<sup>6</sup> See UI Response to Interrogatory AG-3 (Aug. 14, 2020); cf. Docket No. 18-05-04, *PURA Implementation of June Special Session Public Act 17-3*, Second Interim Decision (Sep. 18, 2019) (approving, among other things, UI’s power purchase agreement for Millstone power).

<sup>7</sup> See Motion No. 2 Ruling (Jul. 29, 2020) (“Motion No. 2 Ruling”); Notice, at 1. The Motion No. 2 Ruling was also docketed as a ruling on Motion No. 5 in Docket No. 20-03-02, *PURA Annual Review of the Rate Adjustment Mechanisms of The United Illuminating Company*.

<sup>8</sup> See Notice, at 1.

<sup>9</sup> *Id.*

Standard Service rates. These member companies would be affected directly if customers switched 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 customers to evaluate options for switching from Standard Service to competitive supply. 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 rates. 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. RESA will follow the procedural schedule established by the Authority in this proceeding. Correspondence and other communication in regard to this matter should be served upon the following:

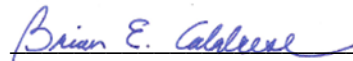
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### **CONCLUSION**

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

Respectfully submitted,  
RETAIL ENERGY SUPPLY  
ASSOCIATION

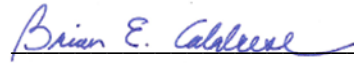


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**CERTIFICATION**

I certify that a copy of the foregoing was sent to all participants of record on this 17<sup>th</sup> day of September 2020.

  
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Brian E. Calabrese