

JOEY LEE MIRANDA

280 Trumbull Street
Hartford, CT 06103-3597
Main (860) 275-8200
Fax (860) 275-8299
jmiranda@rc.com
Direct (860) 275-8227

Also admitted in District of Columbia and
Massachusetts

Via Electronic Filing

January 17, 2024

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

Re: **Docket No. 16-12-29RE01: PURA Development of Voluntary Renewable Options Program - Modification of Implementation Dates**

Dear Mr. Gaudiosi:

Attached is the Retail Energy Supply Association's Motion for Extension of Time in connection with the above-referenced docket.

I certify that a copy of this filing has been sent to all participants of record as reflected on the Public Utilities Regulatory Authority's ("PURA") service list. In accordance with PURA's instructions, "only an electronic copy through the PURA Web Filing System" is being submitted.¹

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

Sincerely,


Joey Lee Miranda

Attachment

Copy to: Service List

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

STATE OF CONNECTICUT

PUBLIC UTILITIES REGULATORY AUTHORITY

PURA DEVELOPMENT OF VOLUNTARY : DOCKET NO. 16-12-29RE01
RENEWABLE OPTIONS PROGRAM – :
MODIFICATION OF IMPLEMENTATION :
DATES : JANUARY 17, 2024

**RETAIL ENERGY SUPPLY ASSOCIATION’S
MOTION FOR EXTENSION OF TIME**

The Retail Energy Supply Association (“RESA”)¹ hereby requests that the Public Utilities Regulatory Authority (“Authority”) grant an extension of time of the date by which all new and renewing voluntary renewable offers (“VROs”) must comply with the standards established in the Docket No. 16-12-29 October 21, 2020 Decision² until thirty (30) days after the Authority approves the revised disclosure labels. In support of this Motion, RESA states:

1. On December 6, 2023, the Authority issued a decision requiring that: (a) the Disclosure Label Working Group (“Working Group”) submit revised disclosure labels by January 15, 2024 for the Authority’s review and approval; and (b) all new and renewing VROs comply with the 16-12-29 Decision standards by February 15, 2024.³

2. On January 12, 2024, in response to a motion from the Working Group facilitators,⁴ the Authority extended the deadline for submission of the revised disclosure labels to January 29, 2024.⁵

¹ The statements 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 See generally, Docket No. 16-12-29, *PURA Development of Voluntary Renewable Options Program*, Decision (Oct. 21, 2020) (“16-12-29 Decision”)

³ See Decision (Dec. 6, 2023), at 4.

⁴ See Motion No. 1 (Jan. 5, 2024).

⁵ See Motion No. 1 Ruling (Jan. 12, 2024).

3. As the Authority is aware, one of the requirements of the 16-12-29 Decision is that suppliers provide customers with the new forward looking disclosure labels *before* enrolling them in VROs and post those disclosure labels on their websites.⁶

4. Even if the Authority were to approve the revised disclosure labels as submitted on the same day that they are filed, suppliers would have a very limited period of time in which to modify all of their materials and processes to incorporate those new labels. Moreover, if the date that the Working Group submits the disclosure labels for approval is further extended or the Authority does not approve the labels the very same day they are submitted, suppliers will have even less time.

5. The process of revising, printing and distributing new disclosure labels, while not as operationally complex as some of the other changes needed to comply with the requirements for offering VROs, will still take time. Moreover, some suppliers rely on outside vendors to print and distribute their materials. Those vendors will also require time to incorporate the new disclosure labels into their processes.

6. Because the disclosure labels are necessary for supplier compliance with the requirements for offering VROs,⁷ RESA requests that the Authority establish the date by which all new and renewing VROs must comply with the 16-12-29 Decision standards based on the date on which the Authority approves the new disclosure labels. In this way, if that date slips for any reason, suppliers will still be provided adequate time to comply with the requirements of the

⁶ See 16-12-29 Decision, at 36 (“The statute requires that a supplier marketing a VRO provide information to substantiate such claims on its website. The Authority will require that any offer posted to the Rate Board include a link to the Disclosure Label for each product. This includes RPS, VRO, and REC-only offers. In addition, the supplier must provide its customers with the information necessary to substantiate their prospective claims as well as past VRO claims on their website. The supplier’s website must also provide the Disclosure Label for any offer that is not listed on the Rate Board, such as offers that are sold through telemarketing, direct mail, or that otherwise may not be generally available.”).

⁷ *Id.*

16-12-29 Decision without the need to seek further extensions of time from the Authority; thereby, increasing administrative efficiency.

WHEREFORE, RESA requests that the Authority extend the date by which “all new and renewing VROs must comply with the new standards” established in the 16-12-29 Decision until thirty (30) days after the Authority approves the revised disclosure labels.⁸

Respectfully Submitted,
RETAIL ENERGY SUPPLY
ASSOCIATION

By:  _____
Joey Lee Miranda
Robinson & Cole LLP
280 Trumbull Street
Hartford, CT 06103
Phone: (860) 275-8200
Fax: (860) 275-8299
E-mail: jmiranda@rc.com

⁸ Cf. Decision (Dec. 6, 2023), at 3 (“[T]he Authority finds that one month is a sufficient amount of time by which to comply and is consistent with the timeframe provided in the VRO Decision.”).

CERTIFICATION

I hereby certify that a copy of the foregoing was sent to all participants of record on this
17th day of January 2024.



Joey Lee Miranda