

**Office of Consumer Counsel  
Annual Report  
Fiscal Year 2022-2023**



**At a Glance**

Claire E. Coleman, Consumer Counsel

Office of Consumer Counsel Established – 1975

Statutory Authority – Connecticut General Statute 16-2a

Central Office – Ten Franklin Square, New Britain, CT, 06051

Number of Employees as of September 1, 2023 – 17 (one additional employee starting Sept. 8<sup>th</sup>)

Recurring operating expenses – \$3,492,467

Organizational Structure – OCC is an independent office, within the Department of Energy and Environmental Protection for administrative purposes only.

**Mission**

The Office of Consumer Counsel serves as a strong independent voice for Connecticut’s public utility and telecommunications consumers through policy advocacy, legal representation and customer education.

**Statutory Responsibility**

The Office of Consumer Counsel’s (“OCC”) statutory responsibilities, pursuant to Sec. 16-2a of the Connecticut General Statutes, include:

- Advocating for Connecticut’s ratepayers in all matters relating to public service companies, electric suppliers, certified video service providers, and certified telecommunications providers;
- Participating in any regulatory or judicial proceedings, federal or state, that involve the interests of Connecticut utility ratepayers, or matters affecting utility services provided in Connecticut;
- Representing utility ratepayers and consumers as a party in contested dockets before the Public Utilities Regulatory Authority (“PURA”);
- Appealing decisions, orders, or authorizations in any state regulatory proceeding impacting utility ratepayers;
- Addressing issues involving rate increases and ratepayer-funded programs, as well as matters concerning the reliability, maintenance, operations, infrastructure, and quality of service of utility companies, suppliers, and providers;

- Working actively with the Connecticut General Assembly, including the Energy and Technology, Environment, Human Services, Appropriations, and General Law Committees, in developing utility, telecom and energy legislation with environmental impact for the outcomes that are in the best interests of consumers, and
- Through the Office of State Broadband (“OSB”), established within OCC in 2015 by the General Assembly through Public Act 15-5, facilitating the availability of broadband access to every state citizen and increasing access to and adoption of high-speed broadband internet access networks in Connecticut.

### **Public Service**

OCC represents the interests of consumers of Connecticut’s public utilities, including the industries of electricity, gas, water, cable and telecommunications. OCC regularly appears before PURA, participates in the legislative process, represents the interests of consumers in appellate litigation, serves as a voting member of the New England Power Pool, participates in proceedings and litigation before the Federal Energy Regulatory Commission, the Federal Communications Commission, and other regional and federal entities, and provides consumers with critical information related to utility and broadband service.

In August 2023 Consumer Counsel Coleman was elected to serve as Chair on the Low-Income Energy Advisory Board, which, in accordance with Connecticut General Statutes 16a-41b, assists the Office of Policy and Management, the Department of Social Services, and the Department of Energy and Environmental Protection in the planning, development, implementation, and coordination of energy-assistance-related programs and policies and low-income weatherization assistance programs and policies, and the impact of utility rates and policies; as well as makes recommendations to the General Assembly regarding legislation and the administration of LIHEAP.

### **Improvements/Achievements in Fiscal Year 2022—2023**

OCC is extremely proud of our work on behalf of consumers in the Fiscal Year 2022-2023 (July 1, 2022 – June 30, 2023), during which OCC continued to operate as a fully independent state agency committed to effectively carrying out its statutory mandate.

OCC’s organizational structure and staffing has been strengthened due to Consumer Counsel Coleman’s establishment of several important and new leadership positions for the office, including a Legal Director, a Director of Utility Oversight and Regulatory Reform, and a Communications and Legislative Program Manager. This new leadership team, together with our long-serving Supervisor of Technical Analysis, has allowed OCC to play a more proactive and effective role this fiscal year in advancing its mission, and will strengthen our ongoing work to ensure consumer interests are protected and advanced going forward. OCC was also able to leverage the state’s support of the Govern for America Fellowship Program to hire a two-year Policy Analyst and Consumer Engagement Fellow in June, who is focused on equity, affordability and consumer engagement initiatives.

OCC’s team of dedicated attorneys, accountants, economists, policy analysts and other skilled staff continue to serve Connecticut consumers through strategic and data-driven analysis, advocacy and legal representation. To briefly summarize, OCC plays an impactful role representing consumer interests in the myriad of PURA proceedings that take place annually, including contested rate cases and annual rate adjustment proceedings, annual reviews of clean energy programs and energy affordability programs. On top of these annual proceedings, OCC has been actively engaged in proceedings to develop a potentially transformative performance-based regulation framework for Connecticut electric distribution

companies (EDCs), and extensive proceedings focused on grid modernization and the integration of new technologies to better serve consumers. We have also been engaged in a record number of appeals of PURA proceedings, including three Connecticut Supreme Court cases. This year we have been very active in the legislature, NEPOOL, and FERC proceedings on behalf of utility consumers. OCC's Office of State Broadband (OSB) continues to serve as a consumer voice for universal, reliable, and affordable service. OSB has been engaged in important PURA proceedings this year that will facilitate the deployment of broadband in the state, as well as extensive federal advocacy before the Federal Communications Commission (FCC). It has been a busy and successful year.

**Savings to Consumers:** Connecticut ratepayers experienced at least \$390 million dollars in direct savings in the 2022-2023 Fiscal Year due to OCC's ongoing advocacy (along with other allies and stakeholders, including fellow state agencies) in dockets before PURA, state court decisions, and advocacy in matters before the Federal Energy Regulatory Commission ("FERC"), including the following:

- **New Savings achieved for 2022-23 fiscal year:**
  - \$38 million in ratepayer savings associated with the OCC's litigation efforts in the Aquarion Water Company rate application litigated in 2022 and 2023;
  - \$3 million in reduced revenue requirements associated with the OCC's 2023 litigation efforts in PURA regulated gas peaking electric generation units rate cases;
  - \$19 million in ratepayer savings associated with OCC's litigation efforts in the sale of the SCG operations center;
  - \$10 Million in OCC's advocacy in the annual proceeding in which PURA reviews and trues up Eversource's and UI's revenue recovery via its Rate Adjustment Mechanisms ("RAM");
  - \$15 million in non-firm margin proceeds being deferred for future ratepayer benefit as a result of the wind down of the gas local distribution companies' (LDC's) gas expansion plan.
- **Continued 2022-23 fiscal year savings achieved related to OCC work in prior fiscal years:**
  - \$150 million in annual ratepayer benefits through the continuation of the rate plan adopted as part of the 2021 joint settlement with Eversource, the Governor's Office, Office of the Attorney General, the Department of Energy and Environmental Protection, and the OCC, that will continue through at least January 2024;
  - \$78 million in annual ratepayer benefits through the continuation of the rate plans approved in three rate case settlements with Yankee Gas, Southern Connecticut Gas Company, and Connecticut Natural Gas Corporation;
  - \$66 million in annual ratepayer benefits through the 2016 rate settlement with the United Illuminating ("UI") Company;
  - \$12 million in continued annual ratepayer savings associated with the OCC's efforts in Connecticut Water Company's 2021 rate case.
- **Expected Savings next fiscal year (related to OCC work this year):**
  - \$289 million in ratepayer savings over the next three years associated with OCC's litigation efforts in UI's 2023 rate case, effective September 1, 2023;
  - Additional \$52 million in savings from the Aquarion rate case due to the rejection of Aquarion's multiyear plan;
  - \$2.3 million in ratepayer savings for UI ratepayers related to OCC advocacy and PURA's final decision in the 2023 UI RAM proceeding;
  - \$2.4 million in ratepayer savings for Eversource ratepayers related OCC advocacy and PURA's final decision in the 2023 Eversource RAM proceeding.

In addition to these quantifiable savings, OCC's work has focused on improving the electric distribution companies' quality of service to Connecticut consumers in many ways, including the reliability and resiliency of the electric grid, storm and emergency response, customer service, low-income affordability programs, grid modernization, as well as working through PURA to help establish procedural and regulatory changes to enable speedy deployment of high-speed broadband.

**I. Advocacy in PURA Dockets:** OCC was a party or participant representing consumers in more than 700 administrative proceedings before PURA (known as dockets) during Fiscal Year 2022-2023. Below is a non-exhaustive list and description of some of the most important dockets that OCC was most active in:

**a. Energy Affordability and Rates**

- *In Docket No. 22-08-08, Application of The United Illuminating Company to Amend Its Rate Schedule*, the Authority conducted a contested proceeding to review the United Illuminating Company's (UI) application requesting PURA's approval to amend the Company's existing rates to increase revenue by approximately \$131 million over three years. OCC was an active participant in this docket. We filed opposing testimony challenging the company's proposals for cost of capital; depreciation; operations and maintenance expenses; plant in service; customer service; and capital planning. We issued over 600 interrogatories and were the most actively engaged party in cross examining the company's witnesses throughout more than two weeks of evidentiary hearings. OCC ultimately filed a brief recommending that PURA reject UI's rate application and substantially reduce the requested unprecedented increase to the Company's current rates and revenues. PURA's final decision, issued on August 25, 2023, approves an annual revenue requirement for UI in the amount of \$384.865 million for a single rate year commencing on September 1, 2023, representing an increase of approximately \$23 million from the Company's currently approved revenue requirement from which the Company had sought a \$131 million increase over three years. PURA's decision adopts key recommendations from the OCC—including the implementation of a single year rather than multi-year rate plan, which will prevent locking in rates under an outdated regime and will make it possible to implement performance-based ratemaking with UI on the fastest possible schedule—and presents clear major victories for ratepayers that will shield UI customers from paying tens of millions of dollars in unjust and unreasonable increased rates. OCC will continue to advocate for further regulatory reform to provide more avenues for keeping utility costs in check.
- *Docket No. 23-01-03, PURA Annual Review of the Rate Adjustment Mechanisms of Eversource* is the annual proceeding in which PURA reviews and trues up Eversource Energy's prior year's revenues via its Rate Adjustment Mechanisms ("RAM"). OCC continues to advocate tirelessly for minimal rate adjustments, ratepayer impact awareness and pragmatic recovery processes by the Company. OCC has propounded significant discovery, participated in evidentiary hearings, and presented briefs and oral arguments for PURA's consideration. In the final stage of this year's proceeding, OCC identified three areas of Eversource's application where the company appeared to have sought greater cost recovery than permissible, and OCC advocated that PURA disallow the recovery of \$17,672,197 in total costs. PURA issued its Final Decision in this year's proceeding on August 16th, 2023, which adopted some of OCC's arguments and disallowed recovery of \$2,349,411 in costs.

- *Docket No. 23-01-04, PURA Annual Review of the Rate Adjustment Mechanisms of the United Illuminating Company*, is the annual proceeding in which PURA reviews and trues up United Illuminating's prior year's revenue recovery. OCC succeeded in advocating for and supporting PURA's adjustments to UI's proposal that ultimately yielded approximately \$2.4 million in savings for UI ratepayers.
- PURA initiated *Docket No. 21-05-15, PURA Investigation into a Performance-Based Regulation Framework for the Electric Distribution Companies*, to investigate, develop, and adopt a framework for implementing performance-based regulation (PBR) for each EDC pursuant to Section 1 of Public Act 20-5 (Take Back Our Grid Act). In the Phase One Decision, PURA adopted regulatory goals, foundational considerations, and priority outcomes that will guide the Authority's development and adoption of a PBR framework in Connecticut. These goals, considerations, and outcomes are rooted in, and have broad applicability to, all utility regulatory matters and will guide current and future utility regulation in Connecticut. OCC played an active role in this proceeding, providing regulatory assessments and recommendations to PURA on various issues, including (1) engaging diverse stakeholders during metric selection, (2) integrating investment efficiency into the priority outcomes; (3) addressing utility capital bias and leveling the playing field between capital and operational expenditures, and (4) integrating Energy Efficiency and Conservation – two cost saving measures – into the priority outcome of GHG Reduction, among others.
- In *Docket No. 21-05-15RE01, PURA Investigation into Revenue Adjustment Mechanisms for a Performance-Based Regulation Framework*, a sub-docket of the initial PBR docket (21-05-15), the Authority is investigating potential modifications and additions to revenue adjustment mechanisms, including, but not limited to, multi-year rate plans, earnings sharing mechanisms, the revenue decoupling mechanism, and potential measures that better equalize capital expenditure solutions with operating expense solutions. This proceeding will establish rules and guidance to govern subsequent EDC rate cases and other relevant proceedings. OCC has provided recommendations to PURA on a variety of issues, including the multi-year plan duration, attrition relief mechanism, going-in rates, revenue cap formula, earnings sharing and revenue decoupling mechanisms, and capex-opex equalization concepts.
- In *Docket No. 21-05-15RE02, PURA Investigation into Performance Mechanisms for a Performance-Based Regulation Framework*, another sub-docket of the initial PBR docket, the Authority is investigating potential modifications and additions to performance mechanisms, including, but not limited to, reported metrics, scorecards, and performance incentive mechanisms (PIMS). More specifically, this proceeding will: (1) align existing reported metrics and adopt new metrics effective immediately where necessary; (2) review and modify existing scorecards as necessary, and if warranted, establish new scorecards to be implemented; and (3) establish PIMs to be implemented in subsequent EDC rate cases and other relevant proceedings. OCC has designed and proposed an initial suite of metrics; scorecards; and performance incentive mechanisms that would create avenues to incentivize the EDCs to better support ratepayer-beneficial outcomes, and balancing penalties where EDCs fail to achieve such outcomes.
- In *Docket No. 21-05-15RE03, PURA Investigation into the Establishment of Integrated Distribution System Planning within a Performance-Based Regulation Framework*, the third sub-

docket of the initial PBR docket, the Authority will investigate the establishment of Integrated Distribution System Planning (IDSP) to anticipate and accommodate the proliferation of distributed energy resources and grid-edge technologies on the distribution system. OCC looks forward to engaging in this proceeding, which is expected to begin in earnest in the early autumn of 2023. OCC hopes this proceeding will chart a pathway for reforms to the EDCs' capital planning processes, that will allow for enhanced transparency, increased accountability, as well as greater predictability for the some of the most impactful cost drivers within base distribution rates.

- Docket No. 22-03-16RE02, *Petition of the Office of Consumer Counsel for an Investigation into the United Illuminating Company and Eversource Energy Regarding Collections Practices During the Covid-19 Moratorium – Wage Garnishment Working Group and Related Matters*, is a re-opener of Docket No. 22-03-16, OCC's initial investigation, for the limited purpose of establishing a working group to evaluate the use of wage garnishments as a bill collections tool, including (1) the social impacts of wage garnishments on residential customers, particularly low-income customers; (2) the cost to Eversource and Avangrid of pursuing wage garnishments, and (3) the use of wage garnishments by utilities in other jurisdictions. Having argued in the underlying docket that the social costs of wage garnishment (particularly on low-income customers) should be measured to compare against its overall reduction to uncollectible expense, OCC is serving as the facilitator of the working group to produce a final report for PURA's review, with recommendations based on discussions and information presented by working group participants in order to consider any changes to the current wage garnishment practices.
- Docket No. 23-05-01, *Annual Review of Affordability Programs and Offerings (Energy Affordability Annual Review)*, is the annual proceeding in which PURA examines energy affordability matters of electric and gas utility customers in Connecticut. This docket provides the opportunity to assess the new and ongoing residential hardship and non-hardship energy affordability programs and offerings in a single annual proceeding, including the implementation of the residential Low-Income Discount Rate (LIDR) as established in the Authority's October 19, 2022 Decision in Docket No. 17-12-03RE11. OCC actively advocated for maximizing affordability for ratepayers throughout this proceeding, including by (1) supporting the implementation of the LIDR in a way that leverages existing Arrearage Forgiveness Programs (AFP) to maximize arrearage forgiveness and affordability and (2) providing recommendations on the Companies' Joint AFP and security deposit policy proposed changes.
- In Docket No. 23-06-02, *GenConn Energy LLC Application to Establish 2024 Revenue Requirements*, PURA is conducting a contested proceeding—pursuant to Conn. Gen. Stat. § 16-243u and the Decision dated June 25, 2008 in Docket No. 08-0101, DPUC Review of Peaking Generation Projects—to review GenConn Energy LLC's application to establish its 2024 revenue requirements, which set rates. A hearing in this proceeding was held on August 29, 2023 and the parties in this proceeding will be briefing positions and argument later this year. OCC participated in the discovery process and the evidentiary hearing, and we are currently preparing for the upcoming Late File Exhibit hearing, tentatively scheduled for September 13, 2023.
- In Docket No. 23-06-03, *GB II New Haven LLC Application to Establish 2024 Revenue Requirements*, the Authority is conducting a contested proceeding—pursuant to Conn. Gen. Stat.

§ 16-243u and the Authority's Decision dated June 25, 2008, in Docket No. 08-01-01, DPUC Review of Peaking Generation Projects—to address the issues raised in GB II New Haven LLC's application requesting that PURA approve the establishment of 2024 revenue requirements for the Company's peaking generation project at One Waterfront Street, New Haven, Connecticut. On August 7, 2023, OCC filed its first set of interrogatories, requesting that the Company provide responses on various topics, including software updates and the impact of PBR on the Company's allowed return. A hearing in this proceeding is scheduled for September 7, 2023.

- In 17-12-03RE10, *PURA Investigation into Distribution System Planning of the Electric Distribution Companies – Building Blocks of Resource Adequacy and Clean Electric Supply*, PURA expanded this docket following a request from legislative leadership for PURA to evaluate Connecticut's standard service procurement practices. OCC has participated in technical meetings and submitted comments to make recommendations regarding potential procurement process updates to ensure that procurements result in the lowest prices consistent with market conditions.

**b. Clean Energy and Grid Modernization**

- In Docket No. 17-12-03RE02, *PURA Investigation Into Distribution System Planning Of The Electric Distribution Companies – Advanced Metering Infrastructure*, PURA is investigating the deployment of Advanced Metering Infrastructure (AMI) for the EDCs, particularly Eversource Energy, which at this time does not utilize AMI. OCC has participated in this docket through evaluation of the EDCs proposed business cases for statewide AMI deployment in Connecticut. This docket also evaluates the business case for technologies and systems related to AMI (smart meter) deployment, including information technology, data management, DER management, and billing systems, among others. OCC has fully participated in this proceeding, advocating for a balanced and strategic approach to AMI deployment to ensure the greatest benefit to all consumers, through written comments, briefing, and participation in technical sessions and hearings. A final decision in this proceeding remains pending and is expected in September of this year.
- In Docket 21-09-17, *PURA Investigation into Medium and Heavy-Duty Electric Vehicle Charging*, the Authority is investigating strategies to optimize the integration of Medium and Heavy-Duty (MHD) electric vehicles, and transit buses in particular, into the grid, including, but not limited to, potential rate design and infrastructure solutions. OCC has provided written comments that advocate for ratepayer interests, including the suggestion to add prioritization of ratepayer protections to the four proposed objectives identified for supporting MHD electrification.
- In Docket No. 22-06-05, *PURA Implementation of Public ACT 22-55*, the Authority is developing requirements and other guidance by which the EDCs will develop three pilot program proposals for the EDCs to build, own, and operate energy storage systems (ESS) for the purpose of demonstrating and investigating how energy storage systems can improve resiliency of critical infrastructure and improve reliability. OCC has actively participated in this docket, providing comments and recommendations on the Companies' proposals and PURA's Interim Decision. Notably, OCC has highlighted that because the actual costs for the Companies' ESS proposals remain unknown, the cost recovery methodology for this program must be contingent upon a full and robust prudency review. OCC also supported the Companies' initiatives to seek out

federal funding to support these projects and recommended that PURA continue to evaluate and require the EDC's pursuit of such funds.

- PURA established Docket No. 22-06-29, *PURA Investigation Into Distributed Energy Resource Interconnection Cost Allocation*, to investigate and potentially implement cost sharing policies and proposals for both residential and non-residential distributed energy resource (DER) interconnection upgrades. The OCC is an active participant in this docket, filing interrogatories and written comments in response to Distribution System Upgrade and Modification Cost-Allocation Straw Proposal.
- In Docket No. 23-08-02, *Annual Residential Renewable Energy Solutions Program Review - Year 3*, PURA intends to review key metrics of the Residential Renewable Energy Solutions (RRES) Program (formerly, Residential Tariff), set the RRES Program tariff rates and any separate REC payments for calendar year 2024, and, as the Authority deems necessary, make strategic adjustments to the Program to ensure continued alignment with the Program objectives. OCC has submitted written comments providing various recommendations including (1) a further review of program rules and incentives/penalties for developers to prioritize deployment for income eligible (IE) customers and distressed municipalities (DM); (2) the use of eligibility maps that include DM, IE, and Environmental Justice (EJ) communities to efficiently allocate resources, incentives, and outreach to vulnerable communities; (3) the creation of a streamlined, simple, and accessible application process that will allow customers from all backgrounds and educational levels to participate in the program; (4) the implementation of a sliding scale or tiered approach for application fees, instead of a flat fee, to reduce or eliminate any barriers for low-income applicants and to ensure that the fees cover the majority of administrative costs.
- Docket No. 23-08-03, *Annual Non-Residential Renewable Energy Solutions Program Review - Year 3*, is the annual proceeding in which PURA reviews the Non-Residential Energy Solutions (NRES) Program—which serves as a combined successor program to the state's Low and Zero Emissions Renewable Energy Credit (LREC/ZREC) and Virtual Net Metering (VNM) programs for non-residential customers—established in Docket No. 20-07-01, PURA Implementation of Section 3 of Public Act 19-35, Renewable Energy Tariffs and Procurement Plans. In Docket No. 23-08-03, PURA reviews key program metrics with stakeholders and evaluates whether and how the program should be modified to more fully accomplish the objectives established in the Final Decision. OCC has submitted written comments providing various recommendations, including that (1) the EDCs make available a methodology document providing sources of data and assumptions and explanations of methodological choices for the updated calculator used for calculating Year 2 price caps; (2) an assessment be performed comparing caps and project sizes across the SCEF and NRES programs; (3) a thorough analysis be conducted to identify specific interconnection barriers for the NRES storage program and a benefit-cost analysis of applicable solutions, where appropriate.
- Docket No. 23-08-05, *Annual Energy Storage Solutions Program Review*, is the annual proceeding in which PURA reviews the Energy Storage Solutions Program (Program), a statewide electric storage program it established in Docket No. 17-12-03RE03. In the annual review, PURA reviews key Program metrics and makes strategic adjustments to ensure continued alignment with Program objectives and that the Program is on track to meet its deployment targets. OCC has submitted written comments expressing its support for (1) the Authority's efforts to achieve 40% deployment with low-income customers and those in underserved communities, (2) the idea of



a fee cap and Connecticut Green Bank's suggestion that vendor fee information be publicly available on the Program website, (3) the expansion of Program eligibility to all storage technologies that can provide safe and reliable storage benefits for Program participants, and (4) any initiative to ensure that the low-income and underserved community incentive adders and other Program benefits are directed towards the Program participants, who represent the intended beneficiaries of the program.

- Docket No. 23-08-06, *Annual Review of the Electric Vehicle Charging Program*, is the annual proceeding in which PURA reviews the EV Charging Program or Program, a statewide electric vehicle (EV) charging program it established in Docket No. 17-12-03RE04. In Docket No. 23-08-06, PURA reviews key Program metrics and makes strategic adjustments to ensure continued alignment with the program objectives and that the Program is on track to meet its deployment targets. OCC has submitted written comments expressing its support for the program adjustments benefiting participants in multiunit dwellings and environmental justice communities.
- Docket No. 23-08-09, *Annual Electric Distribution Company Reliability and Resilience Framework Review*, is the annual proceeding in which PURA reviews EDCs plans submitted in accordance with the reliability and resilience frameworks established by PURA in Docket No. 17-12-03RE08. OCC has submitted written comments expressing its support for (1) initiatives to capture synergies in installing conduit for electrical service simultaneously with conduit for telecommunications or broadband service, (2) strategic undergrounding as a more affordable alternative to full system undergrounding, and (3) a criteria for "significant public benefit" in which the definition of significance encompasses public benefits that pass a benefit-cost analysis for a critical mass of ratepayers.
- In Docket No. 24-08-08, *Non-Wires Solutions Process Initiation Phase*, PURA seeks to create NWS Process guidelines that are necessary to begin the NWS Process cycle in 2025. Non-Wires Solutions refers to alternatives to traditional transmission and distribution system investments, which may include battery storage, distributed generation, voltage optimization, among others. OCC has participated in working group meetings and engaged in active discussions concerning this important new program, which we expect will allow for both PURA and OCC to exercise a more detailed review of important elements of the EDCs' capital planning process.

**c. Natural Gas**

- Docket No. 23-11-02, *Application of Connecticut Natural Gas Corporation and the Southern Connecticut Gas Company to Amend their Rate Schedules*: Upon receipt of completed rate amendment applications from Connecticut Natural Gas (CNG) and its affiliate, The Southern Connecticut Gas Company (SCG), PURA will conduct distribution rate case proceedings for the two companies as a result of a petition filed by OCC, along with the Attorney General, PURA's Office of Education, Outreach, and Enforcement ("EOE"), and the Connecticut Industrial Energy Consumers, on April 24, 2023 to conduct a general rate hearing for the CNG since (1) it has been five years since CNG's last general rate proceeding—one additional year than the four-year periodic review established in statute—and (2) CNG's most recent earnings report showed the Company has been earning 177 basis points above its authorized return on equity ("ROE") of 9.3 percent, which translates into more than \$8 million - collected from ratepayers - in excess of revenues necessary to provide service. In response to the petition, CNG and SCG expressed their

mutual intent to submit rate applications on or before November 1, 2023 to the Authority. As a Party to the proceeding, OCC will continue its work of fighting for consumers by advocating for just and reasonable rates.

- In Docket No. 23-03-01, *Annual Review of the System Expansion Reconciliation Mechanisms*, PURA is conducting a review of the 2022 system expansion reconciliation (SER) filings of Connecticut Natural Gas Corporation, The Southern Connecticut Gas Company, and Yankee Gas Services Company d/b/a Eversource Energy. OCC reviewed the LDCs expenditures to ensure that the projects were consistent with the directives covering the wind down of the gas expansion plan ordered by PURA. We anticipate a proposed final decision will be issued in October of 2023.

**d. Water**

- Docket No. 22-07-01, *Application of Aquarion Water Company of Connecticut to Amend Its Rate Schedule*. On August 29, 2022, Aquarion Water Company of Connecticut submitted its application requesting PURA's approval to amend the Company's existing rate schedules. Specifically, the Company proposed a revenue increase of \$49.9 million, which equates to a 25.2% increase. The proposed increase would add about \$4.25 per month to the bill of a typical residential water customer that uses 72,000 gallons of water annually. PURA approved an annual revenue requirement for Aquarion in the amount of \$195,561,690 for the rate year commencing on March 15, 2023. The approved annual revenue requirement represents a decrease of \$1,969,517, or approximately 0.997%, from the Company's currently approved revenue requirement. While the Company requested a 10.35% return on equity, the Authority determined that an allowed return on equity of 8.70% was appropriate. OCC played an active role in this rate case, issuing discovery requests, presenting expert testimony, and participating in the entire hearing process. OCC had recommended that the Authority reject Aquarion's multiyear rate application and, more appropriately, limit the requested increase to the Company's current rates and revenues for a single year. Significantly, OCC focused expert and staff time on addressing important affordability and equity issues, including the development of a low-income discount rate for Aquarion customers, which was adopted by the Authority in the final decision.
- In Docket 20-10-31WI01, *Application of Jewett City Water Company for Approval of Water Infrastructure and Conservation Adjustment and Semi-Annual Filing Report*, PURA is conducting an uncontested administrative proceeding to review the Jewett City Water Company's (Company) Semi-Annual Filing Report (SAFR), which it filed on July 24, 2023. The Company requests the Authority's approval for a total surcharge of 3.4% on its customers' bills to be rendered on October 1, 2023. The surcharge is for the recovery of allowed costs associated with completed infrastructure projects deemed eligible for a Water Infrastructure and Conservation Adjustment (WICA). OCC submitted its first set of interrogatories to the Jewett City Water Company on August 4, 2023, and will continue to be an active participant in this proceeding.
- In Docket No. 20-12-30WI06, *Application of The Connecticut Water Company for its Water Infrastructure Conservation Adjustment Semi Annual Filing Report*, PURA is conducting an uncontested administrative proceeding to review the Connecticut Water Company's (Company) Semi-Annual Filing Report (SAFR), which it filed on July 27, 2023 and requested approval for a total surcharge of 7.38% on its customers' bills for the recovery of costs associated with completed infrastructure projects deemed eligible for a Water Infrastructure and Conservation

Adjustment (WICA). OCC submitted its first set of interrogatories to the Connecticut Water Company on August 7, 2023, and will continue to be an active participant in this proceeding.

- In Docket No. 22-09-18, *Joint Application of the Town of New Hartford and Aquarion Water Company of Connecticut for Approval of the Transfer of Water and Wastewater System Assets*, The Aquarion Water Company of Connecticut and the Town of New Hartford filed a joint petition with PURA and the Department of Public Health (DPH) to approve a transaction whereby Aquarion would acquire both the municipality's water and wastewater systems and incorporate those systems and the current New Hartford customers into Aquarion's larger operations. OCC participated fully in this proceeding, issuing discovery and cross-examining witnesses from AWC and New Hartford at the evidentiary hearing. OCC filed a brief seeking to ensure that all existing New Hartford water and wastewater customers were provided with meaningful and significant notice concerning the acquisition and corresponding changes to billing and customer service. PURA issued a final decision on August 9, 2023 allowing the transaction and requiring that customers receive transparent communication and notice as advocated by OCC. Wastewater rates will not be modified until Aquarion's next rate proceeding.

**e. Telecommunications and Broadband**

- In Docket No. 19-01-52RE01, *PURA Investigation into Make Ready*, OCC monitors and reviews quarterly reports (semi-annual beginning in 2024) concerning pole owners' application processing costs, and engineering, survey, and make-ready design costs as well as one-touch make ready poll attachment applications.
- In Docket No. 20-03-14, *PURA Investigation of Utility Pole Owners' Compliance with Orders related to Pole Attachments*, OCC monitors and reviews semi-annual reports from utility pole owners pertaining to compliance with all orders related to pole attachments, and makes recommendations to PURA on further action needed.
- In Docket No. 21-07-29, *Single Visit Transfer for Transitioning to Double Poles*, as part of participation in Pole Attachment Working Group, OCC is an active member in the development and execution of the PURA approved Pilot Program for implementing single visit transfers of communications wires from old poles to new, replacement poles.
- In Docket No. 20-04-31, *Frontier Bankruptcy Review*, OCC monitors and reviews all public and confidential compliance reports from Frontier Communications and its wholly owned subsidiary, The Southern New England Telephone Company, required per orders in PURA's final decision approving Frontier and SNET change of control relating to post-bankruptcy reorganization.
- In Docket No. 22-07-21, *Assessment of Civil Penalty and Order to Cease and Desist Against the Southern New England Telephone Company d/b/a Frontier Communications for Safety Violations*, OCC monitors and reviews all public and confidential compliance reports from Frontier Communications and its wholly owned subsidiary, The Southern New England Telephone Company, required per orders in PURA's final decision.

- Docket No. 23-01-05 Annual Assessment to Fund the Development and Administration of Enhanced Emergency 911 Program, OCC monitors PURA proceedings to ensure that E-911 is fully funded by all telecommunications providers and ongoing compliance filings.
- Docket No. 22-06-26, *PURA Study of the Operations of Certified Third-Party Nonprofit Community Access Programming Providers*, was established following legislation to conduct a study regarding the operations of companies and organizations responsible for community access programming operations and facilities. Due to the decreasing number of cable subscribers, the study is evaluating various alternative ways to fund community access stations. OCC has been an active participant in the study, providing examples of alternative funding mechanisms which are being considered in other jurisdictions.
- In Docket No. 23-01-06, *The Public Utilities Regulatory Authority Annual Community Access Support Review*, OCC reviews and evaluates filings and issues raised in the proceeding and provides PURA with OCC's positions on those issues to ensure funding for independent community television stations.
- In Docket No. 22-10-02, *Annual Allocation of Public Educational and Governmental Programming and Education Technology Investment Account Pursuant to Conn. Gen. Stat. § 16-331cc*, OCC monitors applications for PEGPETIA grants to ensure compliance with statutory eligibility requirements.

**II. State Litigation and Appeals:** OCC plays an important and unique role as a statutorily empowered pro-consumer litigant in state appellate court. OCC's active participation in appellate litigation helps preserve hard-won victories in PURA dockets and also helps establish and strengthen pro-consumer legal precedent that benefits all ratepayers in enduring ways. In Fiscal Year 2022-2023, OCC was a party in the Superior Court in eight Administrative Appeals, participated in one Connecticut Appellate Court case, and represented consumer interests in four Connecticut Supreme Court cases. The following are select examples of OCC's state appellate work:

- *Direct Energy Services, LLC, et al. v. Public Utilities Regulatory Authority*, S.C. 20643. In this complex appeal, third-party energy suppliers challenged the validity of PURA's decision to establish consumer-protective disclosure and sourcing requirements for energy supply contracts that claimed to be offering renewable energy to prospective purchasers. Over several years, OCC actively participated at every stage of the underlying regulatory and appellate proceedings to support the consumer safeguards at issue. Finally, before the Connecticut Supreme Court, OCC filed briefing and participated in oral argument in late 2022 to oppose the suppliers' challenges to PURA's pro-consumer decision. In a unanimous decision issued in mid-2023, the Court fully rejected the suppliers' challenges – based on various constitutional and administrative law theories – and affirmed a similar ruling of the trial court. OCC views this decision as an important victory for consumers and for strong regulation of the third-party energy supplier market more generally.
- *The United Illuminating Company v. Public Utilities Regulatory Authority*, S.C. 20795. This pending appeal before the Connecticut Supreme Court concerns the adequacy of The United Illuminating Company's ("UI") performance in response to the devastation of Tropical Storm Isaias. It is the last of several administrative appeals initiated by the utilities arising out of two

major PURA proceedings – specifically, Docket Nos. 20-08-03 and 20-08-03RE01 – that investigated their storm performance and imposed accountability for various deficiencies, including civil penalties. OCC vigorously represented consumer interests in those regulatory proceedings and has intervened in all related appeals. In this present one, UI challenges PURA’s statutory authority to reduce UI’s rate of return on equity in a future rate case to incentivize better storm performance, as well as its statutory authority to impose separate civil penalties. OCC has filed briefing with the Court supporting PURA’s regulatory actions with respect to UI’s storm performance, and it now awaits an oral argument date before the Court.

- *Aquarion Water Company of Connecticut v. Public Utilities Regulatory Authority*, Docket No. HHB-CV-23-6078177-S. In this recent administrative appeal, filed in March 2023, the plaintiff, Aquarion Water Company of Connecticut (“Aquarion”), seeks to overturn PURA’s final decision in the underlying rate case that, among other things, resulted in a historic rate reduction for the water utility’s customers. To help defend this pro-consumer outcome, OCC has intervened in the current appeal and will be submitting briefing on the merits later this year.
- *GenConn Energy LLC v. Public Utilities Regulatory Authority*, S.C. 20716. At stake in this pending Connecticut Supreme Court matter are ratepayer savings arising out of PURA’s final decision in Docket No. 20-06-14, in which PURA disallowed a total of \$4.185 million of plaintiff GenConn Energy LLC’s (“GenConn”) requested annual revenue requirement. OCC intervened in the subsequent appeal filed by GenConn and supported PURA’s defense of its decision due to the beneficial impact to rates. The Superior Court ruled in favor of PURA in January 2022, and GenConn’s next appeal was ultimately transferred to the Connecticut Supreme Court. OCC filed briefing in January 2023 and will present oral argument on September 8, 2023.
- *The United Illuminating Co. v. Public Utilities Regulatory Authority*, Docket No. HHB-CV22-60757510-S. This pending administrative appeal concerns PURA’s final decision dated August 17, 2022, in Docket No. 22-01-04, *PURA Annual Review of the Rate Adjustment Mechanisms of The United Illuminating Company*. In that decision, PURA modified UI’s proposed revenue decoupling mechanism rate for the 2021 adjustment and found that UI’s actions implementing an accounting change for the benefit of ratepayers in 2021, instead of years earlier, was indicative of imprudent and inefficient management and operations. OCC intervened in this matter to protect the ratepayers’ interest in savings that resulted from PURA’s decision. Oral argument will be held on November 13, 2023 in the Superior Court.
- *Northland Investment Corporation v. Public Utilities Regulatory Authority*, S.C. 20769. This appeal is pending before the Connecticut Supreme Court and is likely to be argued later this year. OCC and PURA had prevailed in the Appellate Court, which affirmed PURA’s decision finding that “ratio utility billing systems” – a practice where a residential apartment owner charges tenants for utility costs for which they were not solely responsible – are not permitted under Connecticut law.

### **III. Federal and Regional Consumer Advocacy and Litigation:**

OCC also advocates vigorously for consumer interests at the regional and federal levels. This work targets multiple crucial venues, including NEPOOL, ISO-New England (“ISO-NE”), and the Federal Energy Regulatory Commission (“FERC”). NEPOOL is an advisory governance body for ISO-NE that is

composed of representatives from different wholesale electricity sectors. OCC is a voting NEPOOL member and participates to give voice to ratepayer concerns. Through its NEPOOL work, OCC weighs in on transmission planning, energy market operation, grid resiliency, and other important regional matters related to the region's electricity production and delivery. OCC also engages in direct advocacy with ISO-NE, the region's power grid operator and wholesale market manager, and helps represent consumer interests through its membership on the Coordinating Committee for ISO-NE's Consumer Liaison Group, a public education and outreach body established by FERC order. Finally, OCC engages in litigation before FERC, the federal regulatory body that oversees ISO-NE, and also challenges FERC decisions, when necessary, through federal court appeals.

The following are highlights of OCC's recent work at the federal and regional levels:

- On June 20, 2023, FERC held a Winter Reliability Forum to discuss the health and reliability of New England's energy grid ahead of this winter season. OCC, alongside our fellow advocates in Maine, New Hampshire, and Massachusetts, issued a set of consumer-centric recommendations and guiding principles ahead of the discussions. As ratepayer advocates, we recommended that requests for consumer investments in infrastructure or new markets designs should be backed by rigorous analysis, that any proposed reliability solutions be carefully crafted to avoid overlapping and duplicative efforts and save ratepayers money, and that ratepayer advocates have a permanent seat at the decision-making table in order to ensure that ratepayer dollars are used as a last resort and for projects that will deliver direct consumer benefits.
- Over the last year, OCC participated in two litigation matters before FERC in order to protect consumer interests:
  - In FERC Docket No. ER23-1261, OCC contested additional cost recovery sought by a power generator who had supplied energy during a winter power shortfall. FERC ultimately sided with OCC and other challenging parties and denied a significant portion of the company's claim, saving ratepayers money.
  - In FERC Docket No. ER23-1588-000, OCC joined with other consumer advocates from New England states to contest ISO-NE's proposed Inventoried Energy Program, which we argued would be extremely costly for consumers and was adopted without sufficient, evidence-based analysis.
- OCC has also participated in several federal circuit court cases stemming from the continued operation of the Mystic generation facilities in Everett, Massachusetts. ISO-NE required this gas-fired generator to remain in operation through the end of 2024, and the resulting controversial cost-of-service agreement between Mystic and ISO-NE has cost ratepayers in New England more than \$500 million over the past year alone. Through these federal appeals, OCC has joined with other Connecticut agencies to challenge various costs of the Mystic arrangement, and recently OCC helped obtain a settlement that avoided substantial costs from proposed upgrades and repairs to Mystic's generation facilities and the associated LNG terminal.

The Office of State Broadband has also been extensively involved in consumer advocacy on telecom and broadband issues before the Federal Communications Commission (FCC):

- In Docket No. WC 21-450, *In the Matter of Implementation of the Affordable Connectivity Program*, OCC responded to FCC's request for comments regarding program eligibility

requirements, how to effectively transition consumers to the ACP from the predecessor program and the development of stronger consumer protections. OCC submitted comments advocating for clear and transparent data collections policies, and suggested models based on the practices of other federal agencies. OCC's comments urged the FCC to adopt data protection policies that favor consumer and not internet service providers.

- OCC also submitted comments to the FCC in Docket No. RM 22-69, *Implementing the Infrastructure Investment And Jobs Act: Preventing Digital Discrimination of Access to Broadband*. OCC's comments advocated for a uniform legal approach to claims of digital discrimination, including a model policy that would involve local investigation and enforcement. Additionally, OCC argued for an increase in federal and state resources to enforce digital discrimination regulations. In the FCC's Notice of Proposed Rulemaking, OCC's comments were cited four times as support for the proposed rules.
- FCC Docket No. CG – 22-2, *In the Matter Of Empowering Broadband Customers Through Transparency*, is a critical proceeding for consumers, not just in Connecticut, but nationwide. OCC submitted comments in response to the FCC's request for comments on best practices on the implementation and creation of broadband "Nutrition Labels," a consumer tool for use when shopping for appropriate broadband service. OCC's comments focused on promoting transparency and ensuring that once in effect, there are as many consumer protections as possible. OCC's comments called for additions to the nutrition labels including discounts and surcharges, equipment rental prices, cancellation and other fees, bundle prices and variable pricing, among other data points. The FCC rules should be effective in the upcoming months.

### **Legislative Advocacy:**

The Office of Consumer Counsel actively participated in the 2023 legislative session, preparing written testimony on numerous energy, water, broadband and telecommunications-related proposals and with Consumer Counsel Coleman testifying either in person and virtually at all Energy & Technology committee hearings and well as presenting at two of the committee's Informational Forums. OCC also submitted testimony on relevant proposals considered in the Environment committee.

The testimony that OCC supported and was enacted by the General Assembly included:

- S.B. 7, *An Act Strengthening Protections for Connecticut's Energy Consumers*. OCC supported this legislation which, as passed by the legislature and signed by the Governor into law as Public Act 23-102 on June 29, 2023, delivers greater transparency and avenues for long term cost savings for Connecticut's ratepayers. Among other consumer protection provisions, the bill sets clear limits preventing certain company expenses from being recovered through rates, including lobbying costs, membership dues and advertising expenses. The OCC spends a great amount of time and energy scrutinizing company expenses and then arguing to exclude certain costs during rate cases before PURA. Therefore, having these limitations in statute will allow the OCC's resources to be spent identifying additional areas for potential cost savings for consumers. At OCC's recommendation, the final bill included an expanded list of disallowances to include company costs associated with travel and lodging, entertainment, gifts and investor relations, aligning Connecticut statute with similar laws recently passed in other states.

- S.B. 19, *An Act Prohibiting Fiber Optic Providers and Cable Companies from Charging Through the End of the Billing Cycle After a Subscription is Cancelled*. OCC strongly supported this common-sense consumer protection bill that prohibits cable providers from charging customers for a service that they are not currently enjoying. Customers are typically billed a month in advance for recurring services, however, consumers commonly terminate or discontinue services for many reasons, at times out of their control. Therefore, customers should not be held financially liable and charged for services they are not receiving. Although S.B. 19 was voted out of the Energy and Technology committee, these provisions were included in another legislative proposal, S.B. 1058 *An Act Concerning Charitable Organizations, Telecommunications and the Attorney General's Recommendations Regarding Consumer Protection*, which was signed into law by the Governor on June 26, 2023.
- S.B. 20, *An Act Concerning Acquisitions and Mergers of Cable and Telecommunications Providers*. OCC supported and led legislative advocacy around this landmark legislative proposal that gives PURA the authority to review transfers of control, mergers and acquisitions for entities that own, or control companies authorized to install, operate, and maintain facilities in public streets and highways that all cable and telecommunications companies were subject to prior to October 1, 2007. OCC argued that is critical for the State to reestablish clear, uniform review and approval processes for all communications service providers that are operating under the Public Right of Ways. Under federal law, states have the authority to manage companies that provide communications services in public streets and highways to protect public safety and welfare, ensure continued quality of services and safeguard the rights of consumers on a competitively neutral and nondiscriminatory basis. This proposal was adopted into another bill proposal, H.B. 5314 *An Act Concerning Consumer Agreements and Consumer Bills*, which was signed into law by the Governor on June 28, 2023.
- H.B. 6723, *An Act Permitting Hardship Customers to Purchase Electricity from Energy Suppliers*. OCC has been focusing on equitable access to energy and is always open to finding new options for hardship customers to save money on their electricity bills, including allowing them access to third party supplier offers that have been more affordable than standard service in recent months. OCC offered testimony supporting allowing hardship customers to have access to the third-party market in light of recent market trends, but given historical experiences, recommended including stronger protections and safeguards to ensure hardship customers do not overpay for electricity. This provision was amended to include protections that will revert hardship customers back to standard service if it becomes cheaper than a third-party supplier rate as supported by OCC and was ultimately enacted through S.B. 7 *An Act Strengthening Protections for Connecticut's Consumers of Energy*.

**Representation on Key Organizations, Committees, Boards and Working Groups:**

Consumer Counsel Coleman and OCC staff serve on numerous, state, regional, and federal boards and organizations. Additionally, OCC expertise continues to be in great demand as speakers and participants at national conferences and meetings, regional panels, Connecticut organizations and other forums. OCC highlights the following membership and participation on:

- The National Association of State Utility Consumer Advocates (NASUCA), including the water, gas, consumer protection, telecom and electric committees. OCC's staff attend numerous virtual



and in-person trainings, conferences, and discussions with consumer advocacy groups. In July of this year, OCC participated in-person at NASUCA's 2023 Mid-Year Annual Meeting where Consumer Counsel Coleman gave a presentation on Connecticut's long-term strategy to achieving energy affordability in the state. Consumer Counsel Coleman also presented at the National Association of Regulatory Utility Commissioners (NARUC) on a panel entitled Lessons from the Northeast: Emerging Technologies and Practices to Manage Gas Demand in a Decarbonizing Future. In May, Consumer Counsel Coleman also spoke on a panel at the New England Conference of Public Utility Commissioners (NECPUC) Annual Symposium addressing *Decarbonization and Time Varying Rates*.

- The Commission on Educational Technology (CET), the governance board of the Connecticut Education Network and other fiber network infrastructure, managed by the state. OSB's Broadband Policy Coordinator has served as a member of the Commission of Educational Technology's core planning group for Connecticut's Digital Equity Plan
- The Low-Income Energy Advisory Board ("LIEAB"), which helps in the planning, development and implementation of energy-assistance programs, and low-income weatherization program and policies. Consumer Counsel Coleman assumed the role of Chair in August 2023.
- The Energy Efficiency Board ("EEB"), which serves Connecticut ratepayers through the programs it offers that reduce energy demand and acts as a first line of defense against high winter energy prices. OCC's Associate Economist currently serves as the Vice Chair.
- The Coordinating Committee for the Consumer Liaison Group ("CLG"), a New England-wide entity established through a FERC order, which is tasked with serving as a public forum for consumer-critical information and concerns to be shared among New England ratepayers, various key stakeholders in the regional power grid, and the Board of ISO-New England. Among other activities, the CLG hosts public meetings on a quarterly basis throughout the region to consider significant topics affecting electricity consumers, with a particular focus recently on issues around transitioning the wholesale energy market to cleaner, more sustainable, and more affordable low-carbon power. OCC's Legal Director was elected to a two-year term in December 2022 to represent Connecticut consumers.
- The New England Power Pool ("NEPOOL"), NEPOOL meetings are often attended by nearly 100 representatives of various electric industry participants, including utilities (privately-owned and publicly owned), power plants owners (renewable, fossil, and nuclear), demand response developers, retail, suppliers, heavy industrial users, and parties that serve the public interest (Like OCC). OCC is the sole Connecticut agency that is a voting member of NEPOOL, which function almost as a quasi-legislature, with proposals, votes, collations, and the like. The recommendations of NEPOOL stakeholders do not generally bind the grid operator, ISO New England, but often, the views of a clear majority of NEPOOL stakeholders usually hold sway in the region or at FERC. OCC regularly participates in NEPOOL meetings to represent Connecticut consumers.
- The Consumer Advocates of New England ("CANE"), a working group consisting of representatives from each ratepayer advocacy office in the New England states to promote coordination and identify issues relevant to all state offices.
- Lawyers Collaborative for Diversity ("LCD") board member, which consists of law offices and organizations through Connecticut and seeks to advance the overall diversity of the legal profession. OCC Staff Attorney and Broadband Policy Coordinator is on the Board.
- PURA Interconnections Working Group, comprised of various government and private stakeholders, designed to facilitate, and streamline the interconnection process in Connecticut.

- PURA Interoperability and Managed Charging Working Groups, which comprised of electric utilities, electric vehicle industry representatives, and other state agencies for the purposes of recommending guidelines for both integrating electric vehicle charging equipment into Connecticut’s electric grid and implementing managed vehicle charging standards.
- OCC’s OSB has been an active participant in several broadband advocacy groups, including The National Digital Inclusion Alliance, Broadband Connects America, NTIA’s State Broadband Leaders Network. Additionally, in December 2022 OCC’s Broadband Policy Coordinator was appointed to serve as a Consumer Advocate Representative on the FCC’s Joint Federal-State Board on Universal Service.

a. **Outreach and Education:**

- *Third Party Electric Suppliers.* Each month the OCC examines and analyzes 3<sup>rd</sup> party electric supplier compliance data and produces a “Monthly Supplier Fact Sheet,” which is posted regularly on the OCC website. This fact sheet reports on the state of the residential electric supplier market in Connecticut and the impact it is having on customers with 3<sup>rd</sup> party electric suppliers. Many metrics can be derived from this data, but three important ones stand out. The first of these metrics is the percentage of customers paying more or less than the EDC standard service rate. The second is how much savings or overpayments customers, as a whole, experienced for a particular month. The final metrics is a big pictures view of the impact of electric suppliers on customers. It examines how much savings or overpayments customers experienced on a rolling year basis. The OCC uses this report as a tool to help inform Connecticut customers about competitive supply and the impact it can have on their bills. The OCC Fact Sheets show that for the last fiscal year, Connecticut ratepayers with a 3<sup>rd</sup> party electric supplier saved \$106,370,106. Since OCC started tracking supplier data in January 2015, ratepayers with a third-party supplier have overpaid by \$197,021,802.
- *Consumer Education & Outreach.* OCC regularly issues “Consumer Alerts” on critical topics and changes to utility rates and service to ensure customers are informed. Additionally, this summer, OCC participated in educational events with representatives from advocacy groups, state libraries and the state federal delegation instructing consumers on financial and educational programs that help them access internet devices and service at a reduced price. OCC also expects to provide educational trainings to intervenors in PURA proceedings who seek to participate in the Intervenor Compensation program as established in Public Act 23-102, Sec. 15. These trainings will support public participation and understanding of PURA’s decisions and rulings, as well as general education and awareness regarding public service company regulation and operations and will include resources for the public that explain the role and function of PURA and OCC. This year OCC has also launched the agency’s social media presence, where it shares out important updates and events in an effort to engage consumers.

**Information Reported as Required by State Statute**

OCC has complied with all state requirements regarding affirmative action and equal opportunity, most particularly Connecticut General Statutes 46a-70 through 46a-78, and is in compliance with all other applicable federal requirements.

For further information on OCC activities, visit the OCC website at <https://portal.ct.gov/OCC>