



# The Office of Consumer Counsel

## Presentation to CEEJAC Energy Subcommittee

March 19, 2025

### Claire Coleman

CT Consumer Counsel

### Tom Wiehl

Legal & Regulatory Director



# The Office of Consumer Counsel



- **Independent state agency** representing utility customers since 1975 (CGS 16-2a).
- While our office is small, we are a dedicated team of **subject matter experts** with critical institutional knowledge and unique insight into the nuts and bolts of public service regulation that cannot be found elsewhere.
- Our **focus** is on affordability, reliability, sustainability, cost-effective emissions reduction, technological advancement, and program and policy design to benefit utility consumers.
- We **balance** these goals to achieve the best possible outcome for consumers.
- **Office of State Broadband** –consumer advocate for the availability of affordable high-speed internet access for all residents and businesses.

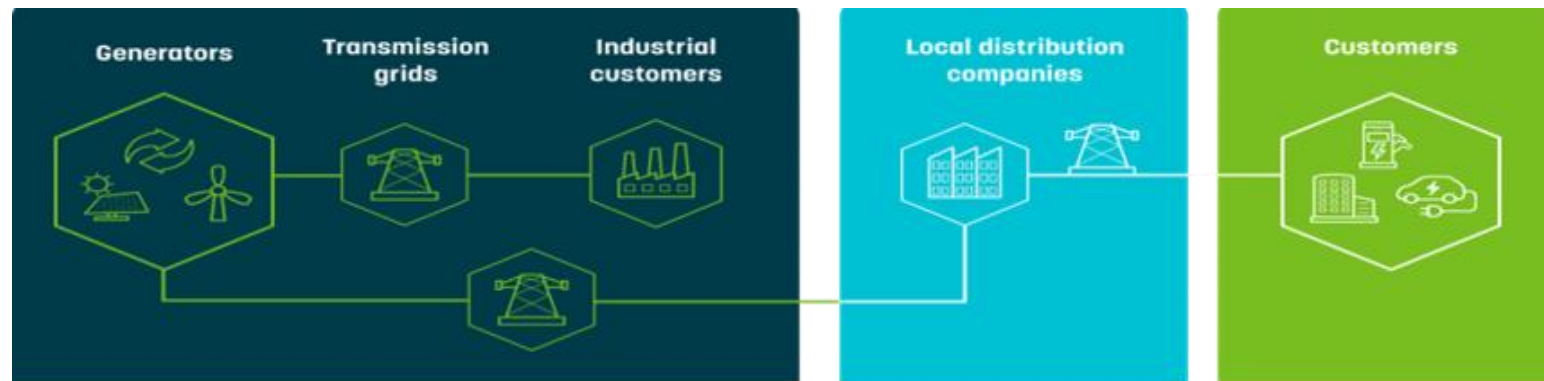
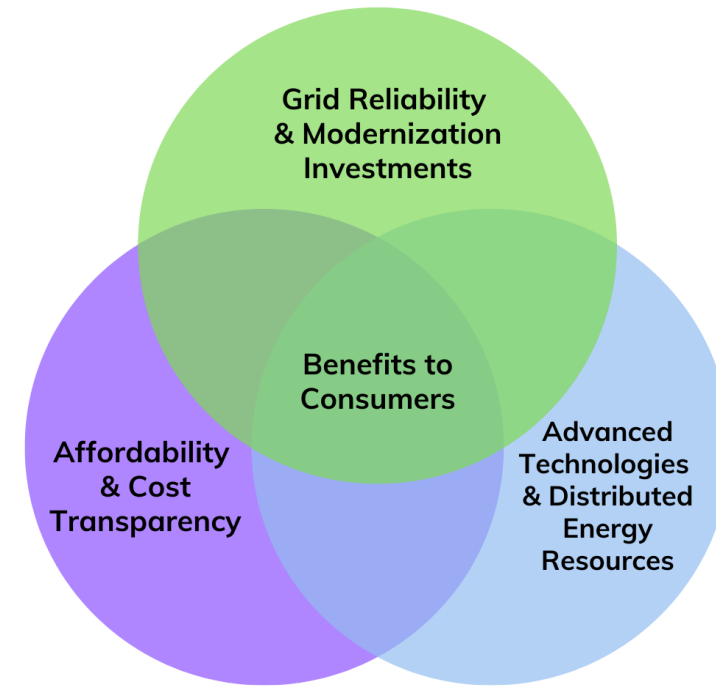
### What keeps OCC busy?

The scope of OCC's work on behalf of energy, water, and telecommunications consumers requires both breadth and depth in expertise – and sustained advocacy in several key forums.

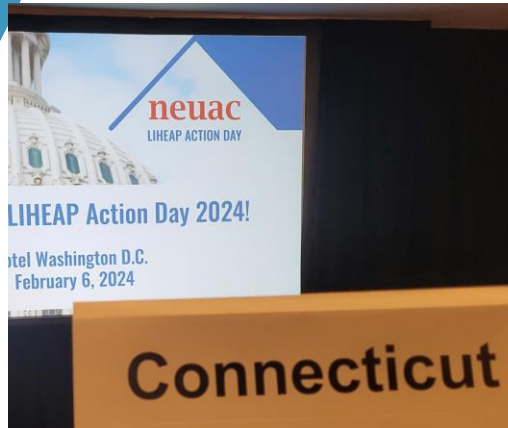


# Advocating for Electricity Customers

OCC balances sometimes competing goals to achieve the best possible electric utility service for consumers – quality & cost effectiveness.



# OCC's Equity Focus



## Consumer Advocacy

From energy affordability challenges to bridging the digital divide, OCC understands the key role of equity in effective consumer advocacy.

Whether it's in DC or at home in CT, we consistently advocate for policies that center consumer needs.

*Pictured above:*  
OCC advocating for the Low-Income Home Energy Assistance Program at LIHEAP Action Day!



## Public Participation

Public participation is critical to making sure the government works effectively for the people it serves.

Our "Stakeholder Intervenor Training Video Series," our "Guide to Public Hearings," our posts with public comment opportunities, and our consumer guidance and FAQ documents are just some of the ways OCC actively encourages public participation in PURA dockets!



## Wage Garnishment Reform

The OCC conducted a working group and produced a report that evaluated the use of wage garnishment as a utility bill collections tool.

Our findings highlighted that the financial impacts of garnishment on those impacted, as well as the procedural injustices often associated with the practice more broadly, are not evenly distributed.

Our recommendation to PURA—to **end unrestricted garnishment practices**—reflected these findings.

PURA ultimately accepted our recommendations, imposing limits on the practice that aim to protect the most vulnerable ratepayers.



## Speaking up!

Consumer Counsel Coleman and the OCC team often speak at conferences about the work we're doing here in CT to ensure energy affordability and equity.

*Pictured above:*  
As a panelist at DOE-LAB's Equity Summit, Consumer Counsel Coleman shared CT's successes, and discussed potential challenges, on the path towards achieving long-term energy equity and affordability.



# OCC Resources

# Training #1: How to Participate in PURA Dockets

Provided by the Connecticut  
Office of Consumer Counsel (OCC)

### Key Terms

**Office of Consumer Counsel (OCC)** - An independent non-party, non-advocacy organization responsible for ensuring Connecticut consumers are not misled into deceptive practices with their companies and their products.

**Public Utilities Regulatory Authority (PURA)** - A state of Connecticut that facilitates and oversees the public utility industry.

**Subject** - A case brought on a specific issue.

**Participants** - Individuals or entities that request to give an interested stakeholder.

**Interested Stakeholder** - The individual, institution, industry organization, and representative of an interested stakeholder or consumer.

### Who's Involved?

OCC consists of attorneys, accountants, financial analysts, and support staff and is administratively housed in the state.

Before being invited to an open house or meeting, interested parties are invited to submit a request to participate in the training for a week ahead.

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### Purpose of the Training

The training event is the first of a series of events that will be held in the state to educate interested parties on the process of participating in PURA dockets.

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### Ways to Participate in PURA

Participation in PURA dockets is a process that involves a number of steps, and there is a number of ways to participate in the process.

The way people communicate has more formal than in other ways, and there is a number of ways to participate in the process.

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### Contact Information

**OCC** - Email for questions/feedback on trainings: [OCCtraining@ct.gov](mailto:OCCtraining@ct.gov)

**PURA** - Email for submitting written public comments and requesting dockets: [Pura.EducatorSecretary@ct.gov](mailto:Pura.EducatorSecretary@ct.gov)

### More Formal Ways to Participate

- 1. Interrogatories** - Formal written questions on a subject matter that participants who formally request a subject, written questions and responses to a certain matter.
- 2. Testimony** - A written form of testimony on a subject matter during an evidentiary hearing.
- 3. Hearings** - Testimony on a subject matter during an evidentiary hearing.

## Stakeholder Engagement Trainings

Are you interested in learning more about how to get involved in PURA dockets? OCC's online trainings can help!

You can find them on our site or our YouTube channel. More trainings coming soon!

# Check out our website!

Here you can find important information and guides for consumers, video trainings, FAQs, and more!

## Connecticut State Office of Consumer Counsel

44-55

CT.gov Home / Office of Consumer Counsel / Electricity

- Electricity >
- Broadband >
- Natural Gas >
- Water >
- Telecommunications >
- Request for Proposals >
- Conservation >
- CMECC & MDC Consumer Advocates >

### Search Office of Consumer Counsel

by Keyword

## Electricity

### Understanding Your Electric Bill

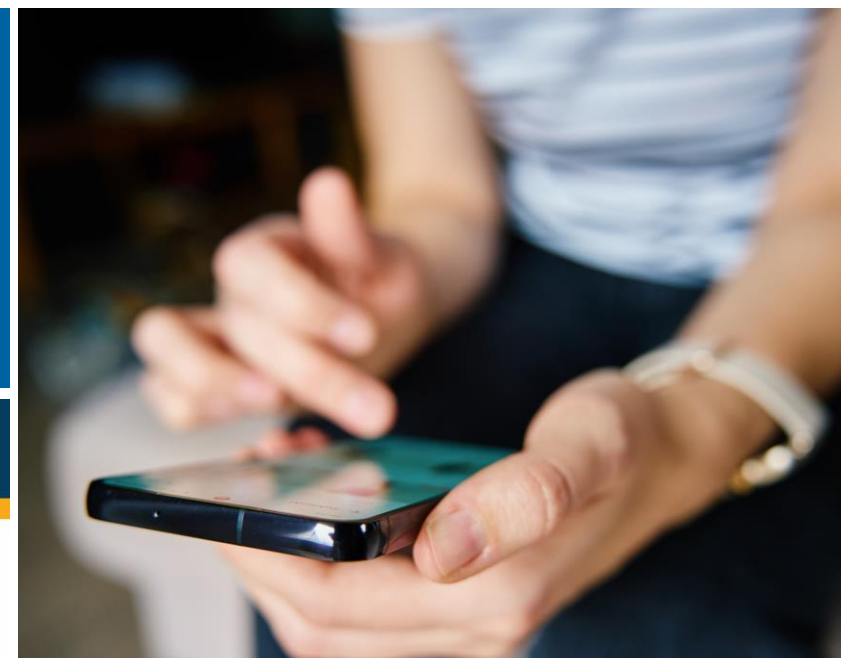
#### Electric Bill/Rate Components

The Office of Consumer Counsel (OCC) provides an updated description of the electric charges on the monthly residential bill as of September 1, 2024.

Please note that the electric companies have implemented a new bill format as required by **Public Act 23-102** and directed by PURA in **Docket No. 14-07-19RE06**.

The first page of your electric bill summarizes your account.

Supply (of Standard Services) is determined in the <b>Transmission</b> Docket, <b>ES-24-01-00-11</b> (24-01-01).		
Transmission rate is determined by FERC & approved in the <b>ES-24-01-00-11</b> (24-01-01).		
Local Delivery (Consumer Charge) is set in a base distribution rate case.		
Local Delivery Improvements is set in the <b>ES-24-01-00-11</b> (24-01-01).		
Local Delivery is set in a base distribution rate case.		
Revenue Decoupling is set in the <b>ES-24-01-00-11</b> (24-01-01).		
Competition Transition Assessment is set in the <b>ES-24-01-00-11</b> (24-01-01).		
Most "Public Benefits" charges are set in this <b>ES-24-01-00-11</b> (24-01-01) "Public Benefits" Docket. This section also includes C&M and C&M charges which are now set in the C&M proceedings (24-02-01).		
	<b>Total Charges for Electricity</b>	
	Supply	\$96.12
	Local Delivery	\$96.12
	Transmission	\$28.87
	Local Delivery Improvements	\$8.49
	Revenue Decoupling	\$0.36
	C&M	\$0.31
	Competition Transition Assessment	\$0.39
	Public Benefits	\$0.39
	FERC Charge	\$0.39
	Competition Transition Charge	\$0.39
	<b>Total Public Benefits</b>	\$0.39
	<b>Total Current Charges</b>	\$196.97



## Connect with us!

OCC's social platforms help us communicate timely information to consumers. From alerts and recent news, to reminders for public hearings and utility assistance info—we got you covered!

Find us on X, Facebook, LinkedIn, and Reddit.

# Elements of the Electric Bill

## Supply

- Generation Services Charge (“GSC”)
- Bypassable Federally Mandated Congestion Charge (“BFMCC”)

## Transmission

- Regional Network Service (RNS), Local Network Service (LNS) rates; Admin Costs

## Local Delivery

- Fixed Charge
- Distribution Rate
- Competitive Assessment (“CTA”)
- Revenue Decoupling
- Electric System Improvements (“ESI”)
  - This charge is only on CL&P customer bills. 2023 Actual Costs were \$163 million - contributed \$50 million to the July RAM increase

## Public Benefits

- Nonbypassable Federally Mandated Congestion Charge (“NBFMCC”)
- Combined Public Benefits Charge
  - Systems Benefits Charge
  - Renewable Energy Investment Charge
  - Conservation and Load Management Charge

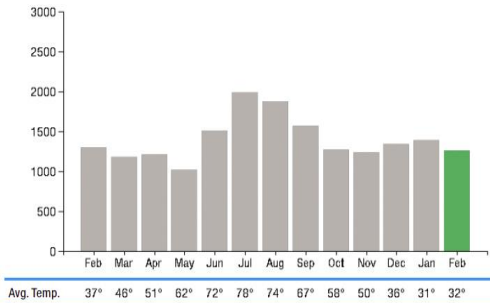
# PUBLIC BENEFITS



Account Number:  
Service Reference No:  
Statement Date:  
  
Service Provided to:

Distribution Rate: 001  
Meter Reading Cycle: 11  
Next Meter Reading: On or About

## Usage History - Total Monthly kWh



## How Your Use Changed

This month your electric use was  
**1260 kWh**

This month you used  
**2.9% less**  
than at the  
same time last year



Amount now due  
by 03/14/25

**\$398.98**

## Current Charges for Electricity

**Supply**  
**\$134.06**

Cost of electricity from supplier or Standard Service. This cost is not regulated, but is based on competitive procurements and dependent on usage.

**Transmission**  
**\$42.85**

Cost to maintain high voltage towers and lines. Regulated by the Federal Energy Regulatory Commission. This charge is dependent on usage.

**Local Delivery**  
**\$110.97**

Cost of Eversource to build, maintain, and repair the poles, lines, and meters that deliver power from the substation. Regulated by PURA.

**Public Benefits**  
**\$111.10**

Cost to support energy programs authorized by the state. This charge is dependent on usage.



### Supply Cost Comparison

Your Supply Cost:  
Standard Service Cost:

### Your Supplier Contract

Supplier Rate:

Term:

Expires:

Apr Cycle Rate:

### Standard Service

Standard Service Rate:

Term: 6 months

Expires:

### Your Supplier Information

Supply contract information is provided by your supplier. Contact your supplier to verify the information. To return to Standard Service visit [EnergizeCT.com](http://EnergizeCT.com) or contact us at [Eversource.com](http://Eversource.com) or 800-286-2000.

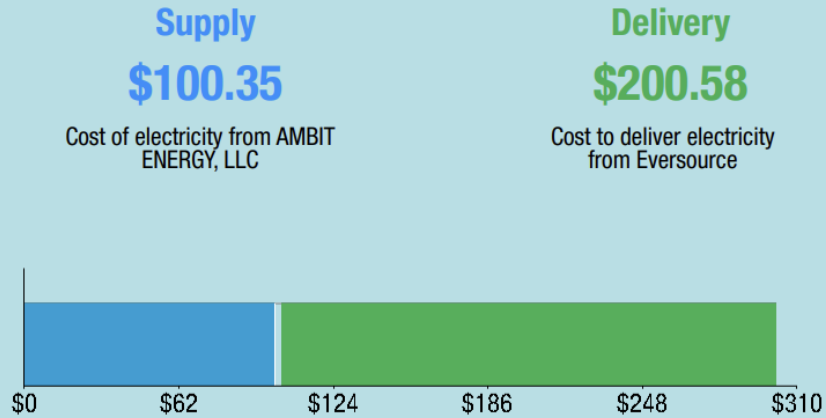
## News For You

We know you count on us every day for the energy you need, especially as you use energy to keep warm. We can help you manage your energy use and bill this winter and beyond. Visit [Eversource.com/winter-bill](http://Eversource.com/winter-bill).



# EVERSOURCE BILL FROM 2022

## Current Charges for Electricity



Only 2 categories

FMCC & CPBC were part of "Delivery"

## Total Charges for Electricity

### Supplier

AMBIT ENERGY

Service Reference: 099712005

Generation Srv Chrg**	1448.00kWh X \$0.06930	\$100.35
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Subtotal Supplier Services	\$100.35
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### Delivery

(DISTRIBUTION RATE: 001)

Service Reference: 099712005

Transmission Chrg	1448.00kWh X \$0.03681	\$53.30
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Distr Cust Srv Chrg		\$9.62
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Electric Sys Improvements***	1448.00kWh X \$0.01003	\$14.52
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Distr Chrg per kWh	1448.00kWh X \$0.05844	\$84.62
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Revenue Adj Mechanism	1448.00kWh X \$0.00192	\$2.78
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CTA Chrg per kWh	1448.00kWh X \$-0.00036	-\$0.52
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TS Isaias Performance Penalty	1448.00kWh X \$-0.00141	-\$2.04
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FMCC Delivery Chrg	1448.00kWh X \$0.01397	\$20.23
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Comb Public Benefit Chrg*	1448.00kWh X \$0.01248	\$18.07
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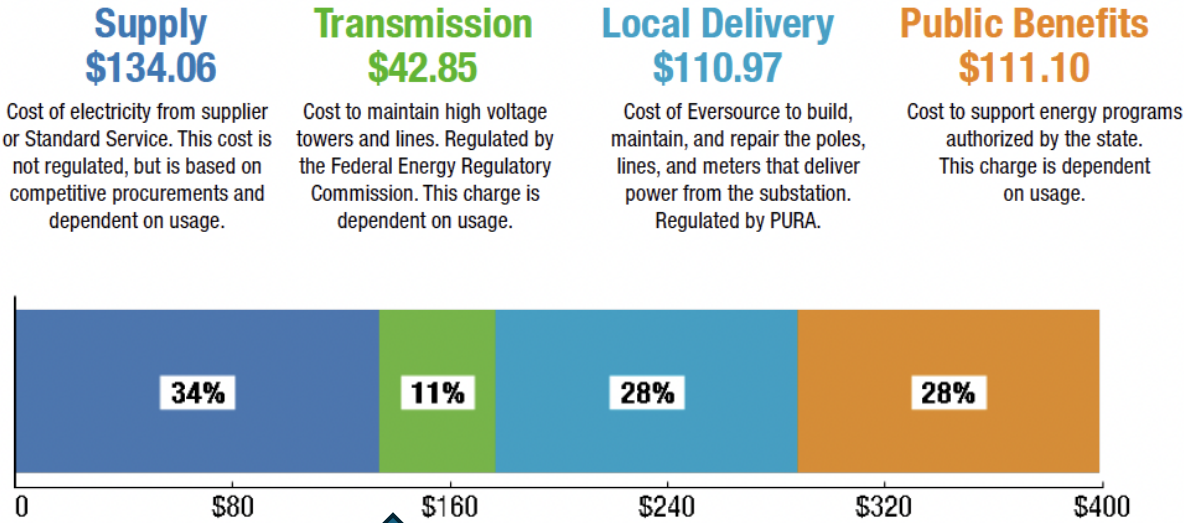
Subtotal Delivery Services	\$200.58
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<b>Total Cost of Electricity</b>	<b>\$300.93</b>
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<b>Total Current Charges</b>	<b>\$300.93</b>
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# EVERSOURCE BILL FROM 2025

## Current Charges for Electricity



Now 4 categories

FMCC & CPBC are now within "Public Benefits"

## Total Charges for Electricity

<strong>Supply</strong>		
MAJOR ENERGY ELC SVC, LLC		
Supply	1260.00kWh X \$0.10640	\$134.06
<strong>Subtotal Supply</strong>		<strong>\$134.06</strong>
<strong>Transmission</strong>		
Transmission	1260.00kWh X \$0.03401	\$42.85
<strong>Subtotal Transmission</strong>		<strong>\$42.85</strong>
<strong>Local Delivery</strong>		
Fixed Monthly Charge		\$9.62
Local Delivery Improvements	1260.00kWh X \$0.01967	\$24.78
Local Delivery	1260.00kWh X \$0.05844	\$73.63
Revenue Decoupling	1260.00kWh X \$0.00195	\$2.46
CTA	1260.00kWh X \$0.00038	\$0.48
<strong>Subtotal Local Delivery</strong>		<strong>\$110.97</strong>
<strong>Public Benefits</strong>		
FMCC Charge	1260.00kWh X \$0.04791	\$60.37
Comb Public Benefit Chrg	1260.00kWh X \$0.04026	\$50.73
<strong>Subtotal Public Benefits</strong>		<strong>\$111.10</strong>
<strong>Total Current Charges</strong>		<strong>\$398.98</strong>

## What is “FMCC”?

FMCC Charge – The Federally Mandated Congestion Charge collects costs for the Millstone energy contract, other distributed resource (generation) programs, some long-term renewable energy contracts, The Low-Emission Renewable Energy Credit and Zero-Emission Renewable Energy Credit Programs, Solar Home Renewable Energy Certificate program and Passive Demand Response Programs. If the FMCC Charge is \$0.00, it will not be listed on billing statements.

Description from  
Eversource website



Technically called the “Non-Bypassable Federally Mandated Congestion Charge, or “NBFMCC”

Primarily costs driven by statute or regulation that benefit grid congestion


Includes all costs of PURA-regulated clean energy programs (RRES, NRES, SCEF, ESS, EVs, IES)

The NBFMCC is currently between 3 and 5 cents per kWh, or \$23-\$33 per month for the average customer.

## What is “Combined Public Benefits Charge”?

- Combined Public Benefits Charge – This charge is made up of three charges, which are:
  - The Systems Benefits Charge that covers assistance programs.
  - The Conservation & Load Management Charge, which covers energy efficiency programs.
  - The Renewable Charge, which promotes growth, development and sale of renewable energy.

Description from  
Eversource website



The CL&M Program costs, also known as the Conservation Adjustment Mechanism or “CAM”

The Renewable Charge, which funds the Renewable Energy Investment Fund (aka CT Clean Energy Fund)

Systems Benefits Charge, for affordability programs

## What is “Combined Public Benefits Charge”?

The CL&M Program costs, also known as the Conservation Adjustment Mechanism or “CAM”

Funding Sources	2023 Eversource Electric Revenues	2023 UI Revenues	2023 Combined Total	2024 Eversource Electric Revenues	2024 UI Revenues	2024 Combined Total	2025 Eversource Electric Revenues	2025 UI Revenues	2025 Combined Total
ISO-NE FCM	\$16.3	\$3.2	\$19.5	\$12.7	\$2.8	\$15.5	\$12.5	\$2.7	\$15.2
RGGI	\$22.8	\$6.8	\$29.6	\$23.4	\$5.8	\$29.2	\$23.9	\$6.0	\$29.9
CAM (Net of Gross Receipts Tax)	\$109.3	\$30.4	\$139.7	\$112.1	\$27.0	\$139.1	\$111.8	\$27.2	\$139.0
<b>TOTAL (EE Revenues)</b>	<b>\$148.4</b>	<b>\$40.4</b>	<b>\$188.8</b>	<b>\$148.2</b>	<b>\$35.6</b>	<b>\$183.8</b>	<b>\$148.2</b>	<b>\$35.9</b>	<b>\$184.1</b>

The CAM funds 75% of the CL&M budget, which derives proven energy efficiency savings

The current cost of the CAM is \$0.006/kWh, or approximately \$4.20 per month for the average customer.



## What is “Combined Public Benefits Charge”?

The Renewable Charge, which funds the Renewable Energy Investment Fund (aka CT Clean Energy Fund)



This is the primary source of revenue for the Connecticut Green Bank

The current cost of the Renewable Charge is \$0.001/kWh, or approximately 70 cents per month for the average customer.

## What is “Combined Public Benefits Charge”?

Systems Benefits Charge, for affordability programs

The SBC is the largest piece of the Combined Public Benefits Charge.

It primarily funds affordability programs such as payment plans and the Low Income Discount Rate

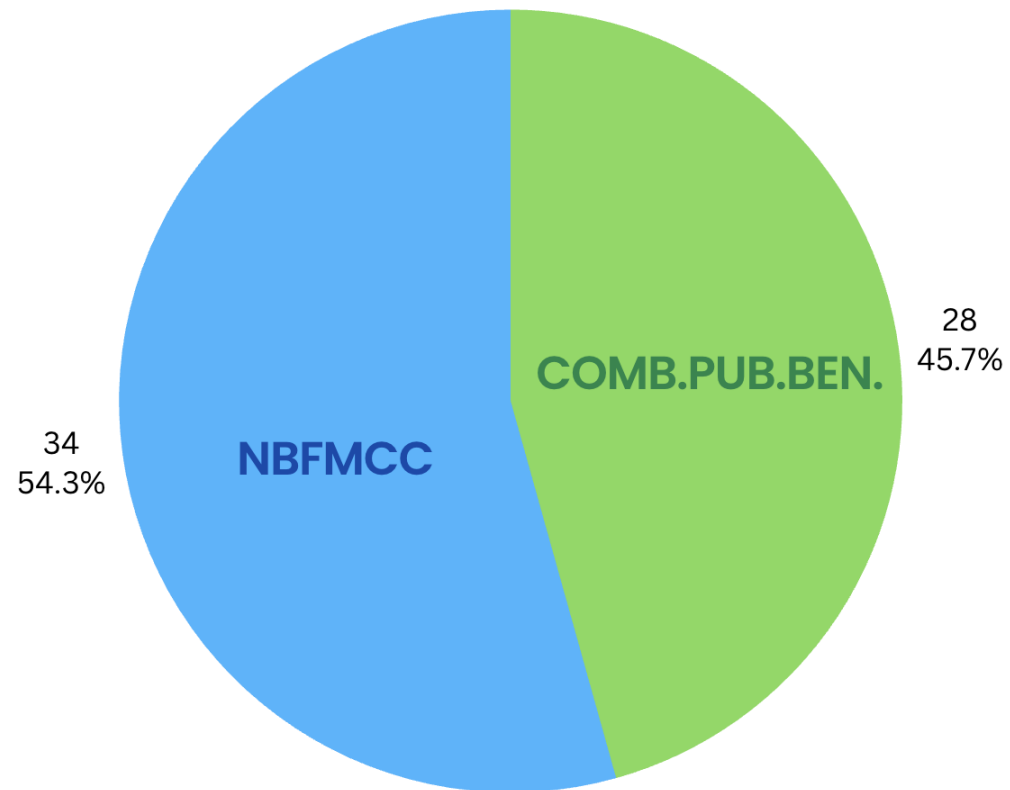
It also includes funding for Operation Fuel and the EnergizeCT Heating Loan Program

The SBC is also where hardship uncollectible debt is recovered.

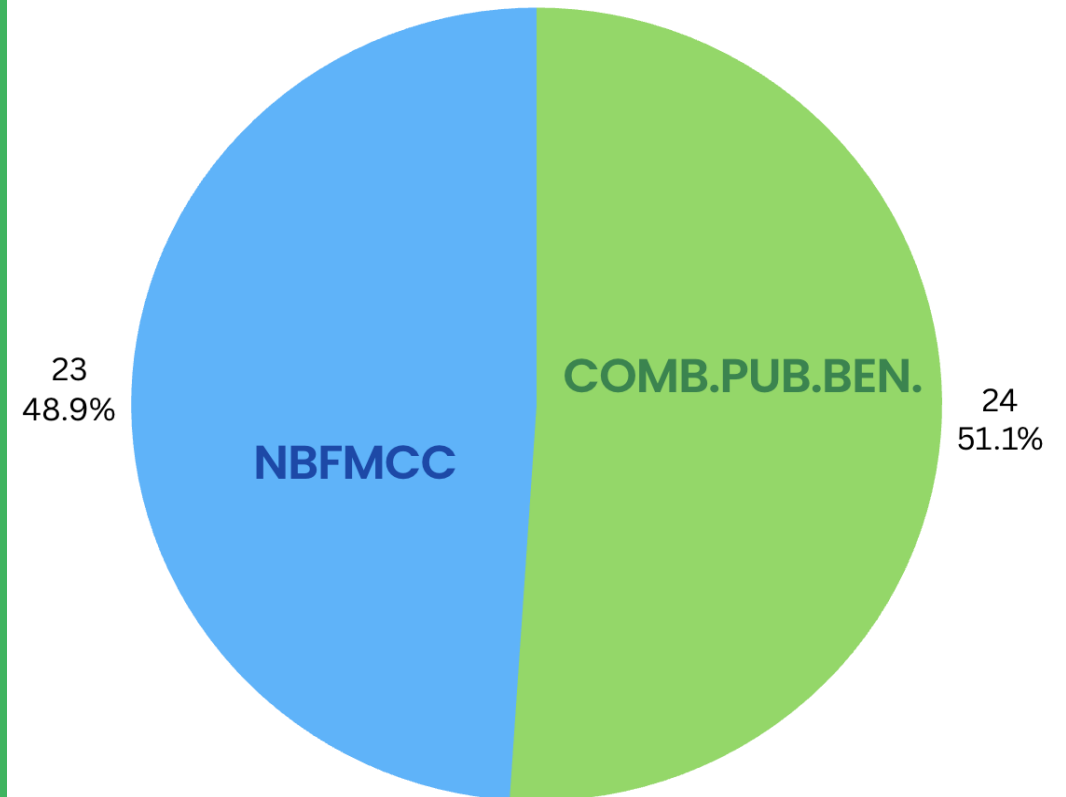
At current rates, the SBC is about 4 cents/kWh, or approximately \$28/month for the average customer

## Breakdown of “Public Benefits” Category

### CL&P PUBLIC BENEFITS

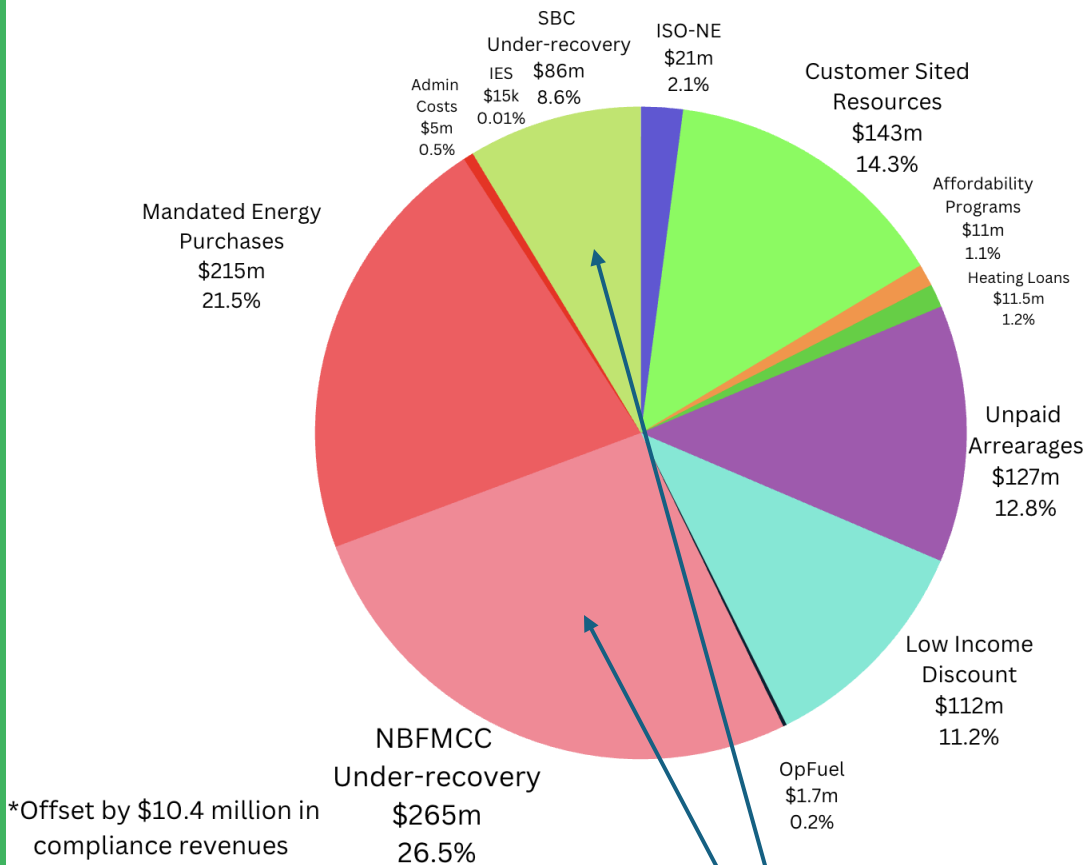


### UI PUBLIC BENEFITS

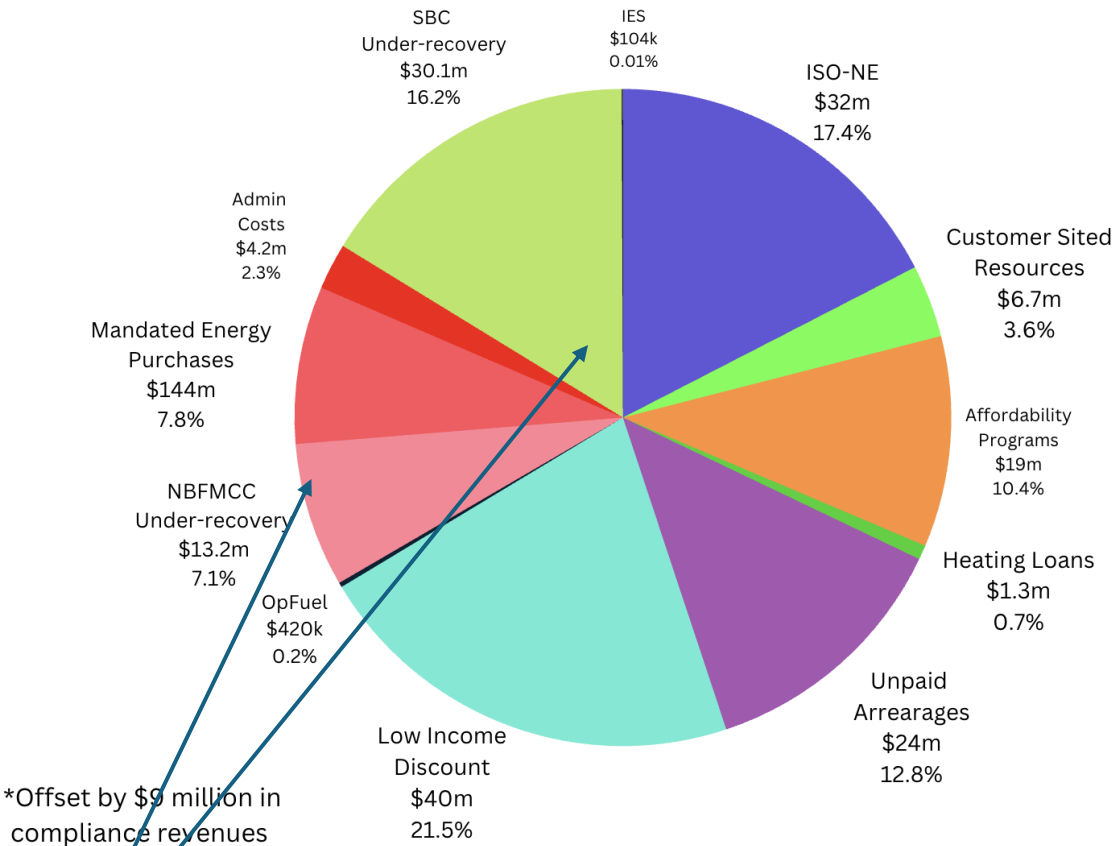


# Breakdown of “Public Benefits” Category

Eversource 2024 NBFMCC & SBC Totals July 1 Rates



UI 2024 NBFMCC & SBC Totals - July 1 Rates



Under-recoveries

## What is an under-recovery?

Rates are set for “contemporaneous recovery”, meaning the utility is collecting compensation for costs as they are incurred.

Each year, the utilities file applications with PURA showing their expected costs for the coming year.

Utilities use the previous year’s costs as a basis for estimating the next year’s cost, but are allowed to make “known and measurable” adjustments.

For instance, if a particular program cost \$1 million last year, but the utility has good reason to believe it will cost \$200,000 more next year, the utility will ask PURA to set the rates so that the utility will be paid \$1.2 million over the next year.



## What is an under-recovery?

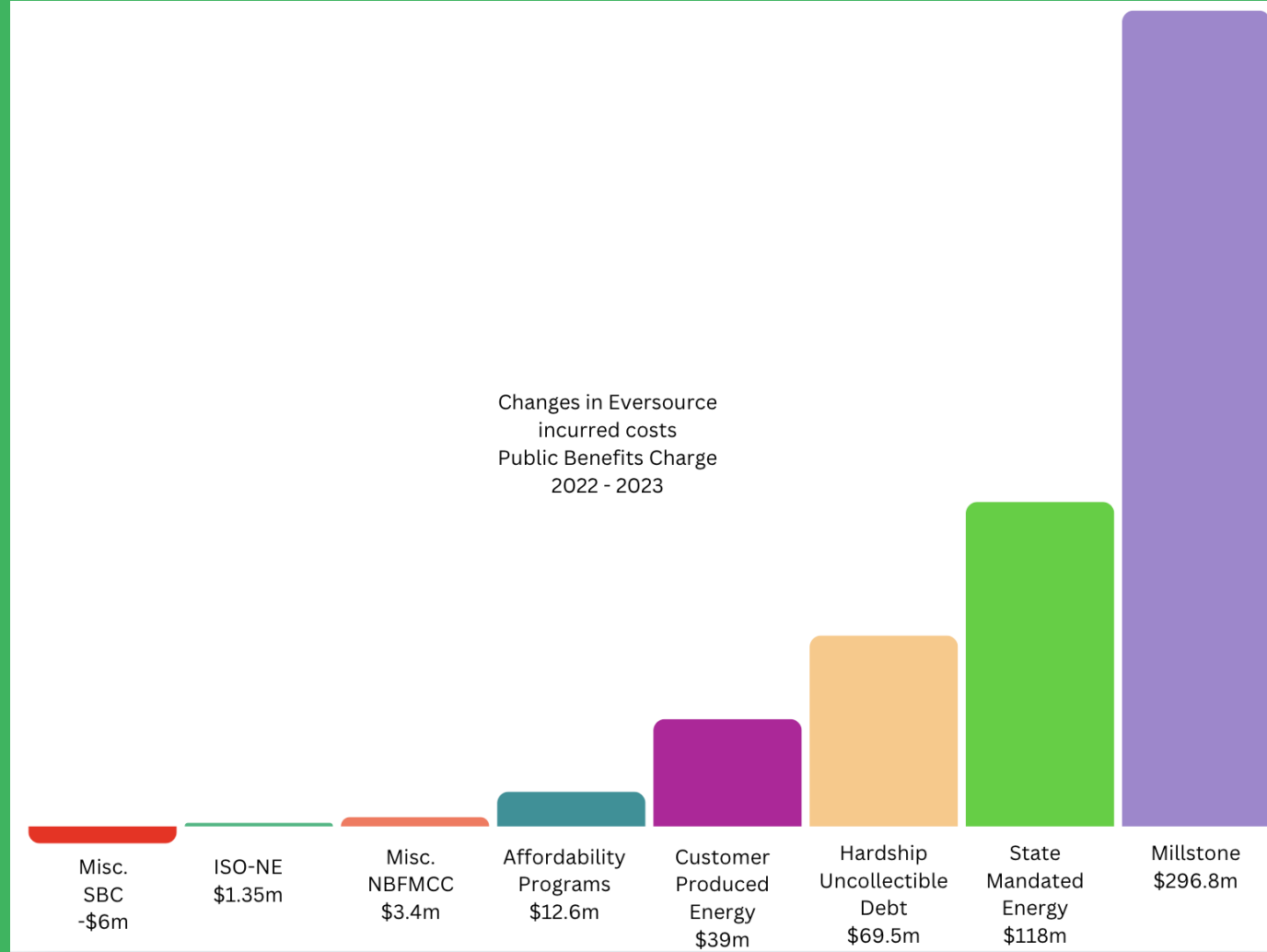
However, it is possible that rate revenues do not match actual expenses.

For example, if rates are set for the utility to recover \$1.2 million, but the actual costs end up being \$1.5 million, the utility will be “short” \$300,000.

That \$300,000 is an “under-recovery,” and the utility must be paid back, **with interest.**

The utility is paid back in the next year’s rate adjustment. So every RAM adjustment is setting rates for the utility to collect: 1) the revenue they will need for next year’s expenses, AND 2) any money owed from the prior year.

## What is an under-recovery?



Because rates are generally set using the prior year's actual costs, you can get a sense of the drivers of under-recoveries, you can observe the changes in year-to-year actual costs.

# Questions?

