



The Office of Consumer Counsel

Presentation to CEEJAC Energy Subcommittee

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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.



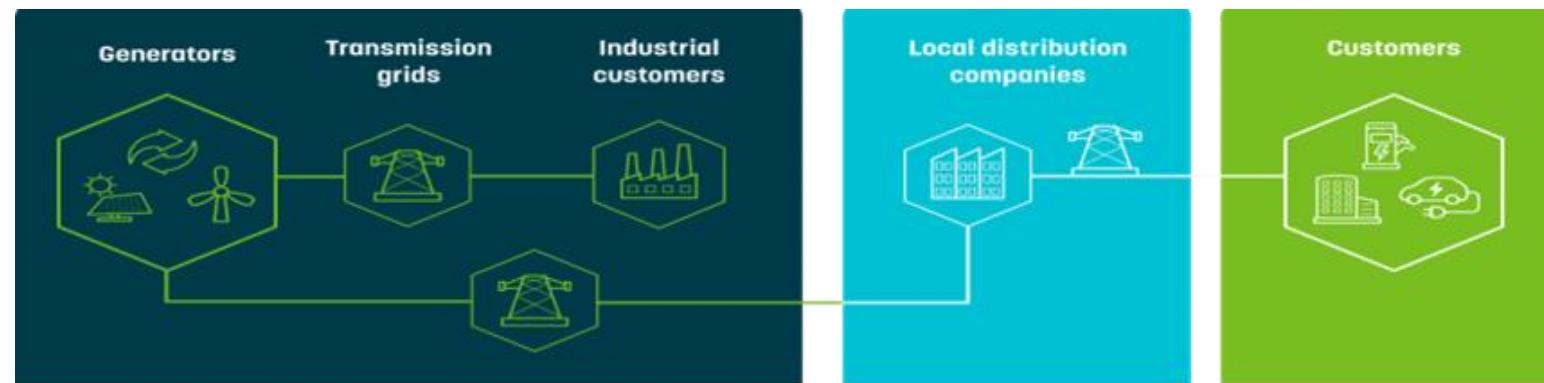
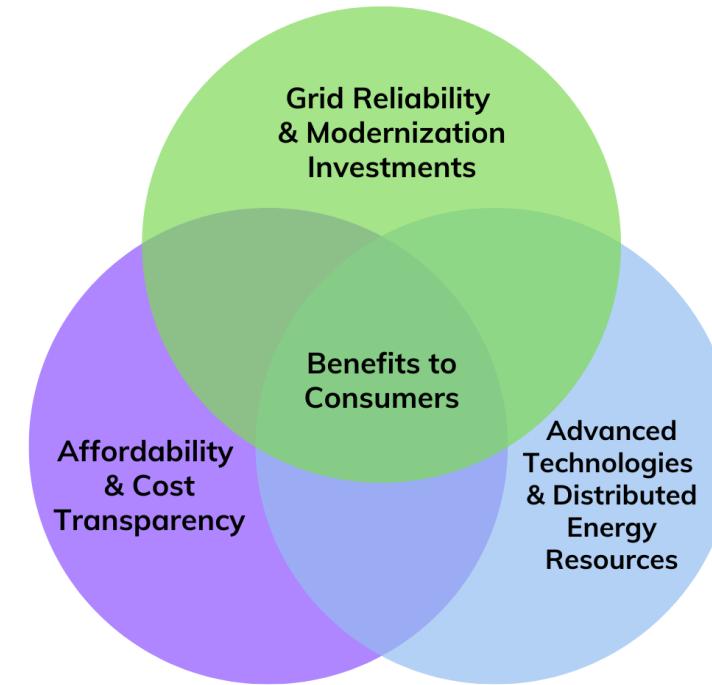
What keeps OCC busy?

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.

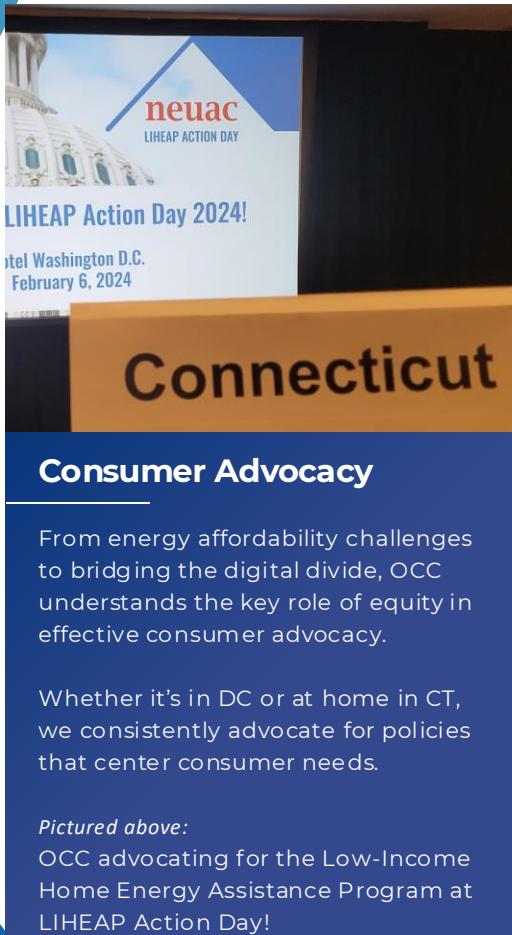


Advocating for Electricity Customers

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



OCC's Equity Focus



TRAINING 1: WHAT ARE PURA AND OCC AND WHAT DO WE DO?

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 state agency with statutory responsibility to represent Connecticut customers in the regulated utility industries of electric, natural gas, and water, cable, and telephone.

Interrogatories - A written form of examination and cross-examination of a witness, or of a party or party's witness, in a proceeding before a court, judge, or arbitrator.

Administrative Hearings Authority (AHA) - Office of the Attorney General that oversees and administers the state's government hearings.

Decided - A case decided on a specific issue.

Participants - Individuals or entities that request to be an unrepresented party.

Intervenor - Individuals or entities that request to be a represented docket.

Procedural Rule - The inclusive, accessible, authentic, transparent, and nonadversarial of all concerned individuals in a proceeding.

Who is OCC?

OCC consists of attorneys, investigators, financial analysts, and support staff and is organized into three main units:

- Consumer Protection** - subject questions and provides consumers in the utility industries with information, advice, and advocacy services, as specified by the statute for which the unit is created.
- Administrative Hearings** - Hear additional areas of merit including electric, natural gas, water, cable, and telephone. The AHA is responsible for the administration of proceedings related to rates, fuel energy sources, utility safety, and consumer engagement.

Office of Consumer Counsel
Consumer Protection

Purpose of the Trainings

This training series is the first of a three-part series designed to introduce consumers and interested parties to the process of participating in PURA dockets. The training will cover what you can expect in the process, how to file a complaint, and what you can expect in the process of being a participant in a proceeding.



Ways to Participate in a Docket

Participation in PURA dockets can consist of two main ways to be involved: people new to the process, or people who have been involved in the process.

The way people communicate will feel more formal than an off-the-cuff conversation. It is important to look at two options: less formal

Contact Information

OCC
For general questions/feedback on trainings:
OCCTraining@ct.gov

PURA
For filing a complaint or submitting written public comments and requesting docket numbers:
Pura.E.receivesdocuments@ct.gov



More Formal Ways to Participate

- Interrogatories** - Formal written questions on topics of interest to the party asking the question. May be answered in writing or orally in a hearing.
- Testimony** - The written form of testifying on a witness stand during an ordinary hearing.
- Hearings** - Testifying on a witness stand during an emergency hearing.



Check out our website!

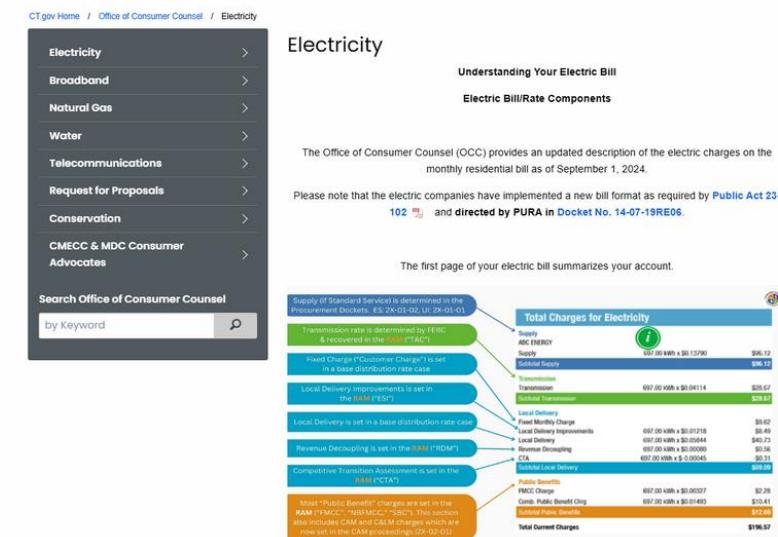
Here you can find important information and guides for consumers, video trainings, FAQs, and more!



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!



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

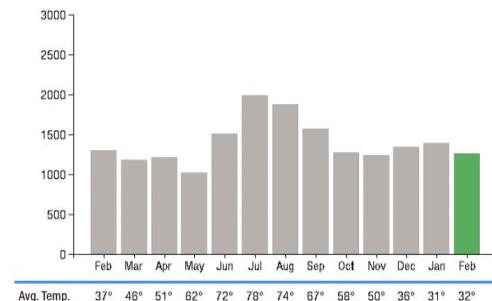
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Account Number:
Service Reference No:
Statement Date:
Service Provided to:

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 | Transmission | Local Delivery | Public Benefits |
|-----------------|----------------|-----------------|-----------------|
| \$134.06 | \$42.85 | \$110.97 | \$111.10 |

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

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

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

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:

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 or contact us at Eversource.com or 800-286-2000.

Standard Service

Standard Service Rate:
Term: 6 months
Expires:

News For You

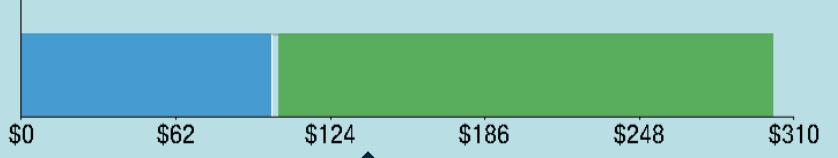
We know you count on us every day for the energy you need, especially as you use energy to keep warm. We can help you manage your energy use and bill this winter and beyond. Visit Eversource.com/winter-bill.

Remit Payment To: Eversource, PO Box 56002, Boston, MA 02205-6002

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EVERSOURCE BILL FROM 2022

| Current Charges for Electricity | |
|--|---|
| Supply | Delivery |
| \$100.35 | \$200.58 |
| Cost of electricity from AMBIT ENERGY, LLC | Cost to deliver electricity from Eversource |



Only 2 categories

FMCC & CPBC were part of “Delivery”

Total Charges for Electricity

Supplier

AMBIT ENERGY

Service Reference: 099712005

| | | |
|----------------------------|------------------------|----------|
| Generation Srvc Chrg** | 1448.00kWh X \$0.06930 | \$100.35 |
| Subtotal Supplier Services | | \$100.35 |

Delivery

(DISTRIBUTION RATE: 001)

Service Reference: 099712005

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

EVERSOURCE BILL FROM 2025

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.



Now 4 categories

FMCC & CPBC are now within “Public Benefits”

Total Charges for Electricity

Supply

MAJOR ENERGY ELC SVC, LLC
Supply

1260.00kWh X \$0.10640 \$134.06

Subtotal Supply

Transmission

Transmission 1260.00kWh X \$0.03401 \$42.85

Subtotal Transmission

Local Delivery

| | |
|-----------------------------|---------|
| Fixed Monthly Charge | \$9.62 |
| Local Delivery Improvements | \$24.78 |
| Local Delivery | \$73.63 |
| Revenue Decoupling | \$2.46 |
| CTA | \$0.48 |

Subtotal Local Delivery

\$110.97

Public Benefits

| | |
|--------------------------|---------|
| FMCC Charge | \$60.37 |
| Comb Public Benefit Chrg | \$50.73 |

Subtotal Public Benefits

\$111.10

Total Current Charges

\$398.98

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 |
| TOTAL (EE Revenues) | \$148.4 | \$40.4 | \$188.8 | \$148.2 | \$35.6 | \$183.8 | \$148.2 | \$35.9 | \$184.1 |

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

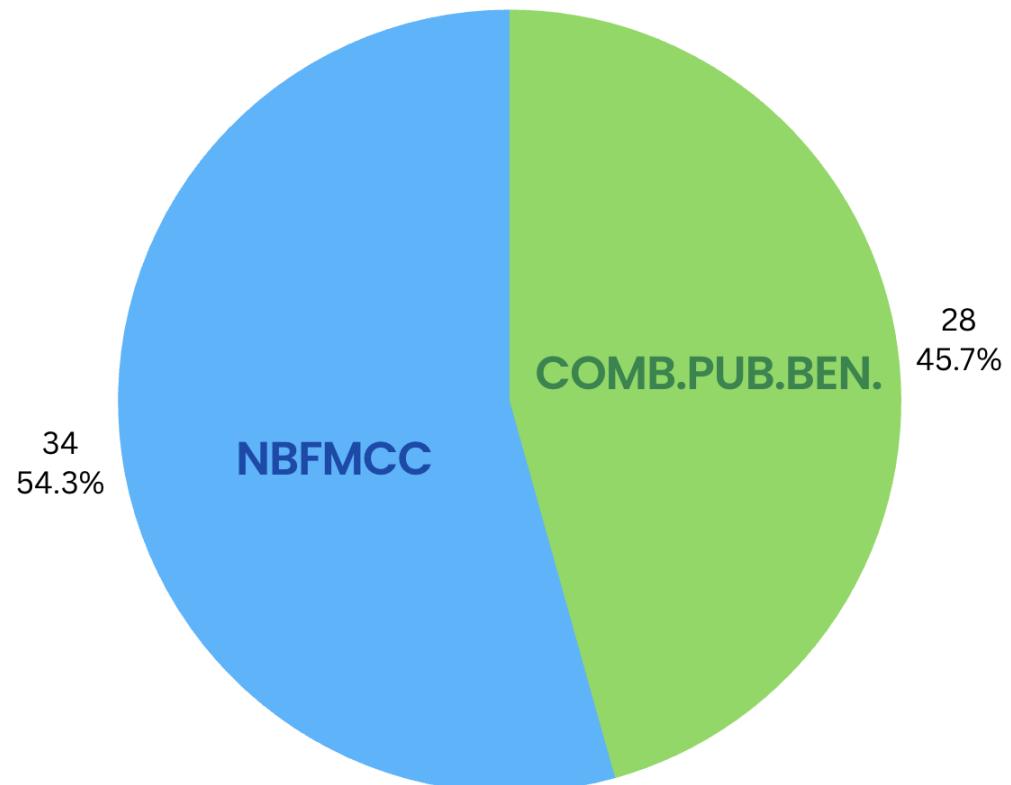
It also includes funding for Operation Fuel and the EnergizeCT Heating Loan Program

The SBC is also where hardship uncollectible debt is recovered.

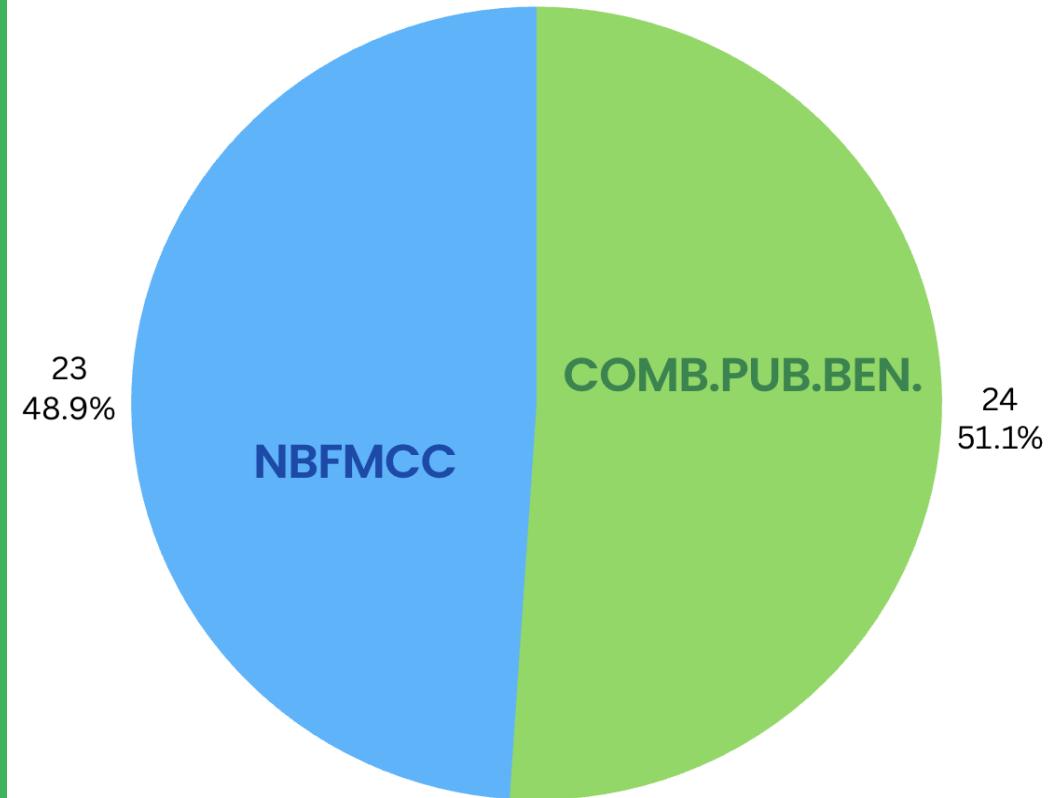
At current rates, the SBC is about 4 cents/kWh, or approximately \$28/month for the average customer

Breakdown of “Public Benefits” Category

CL&P PUBLIC BENEFITS

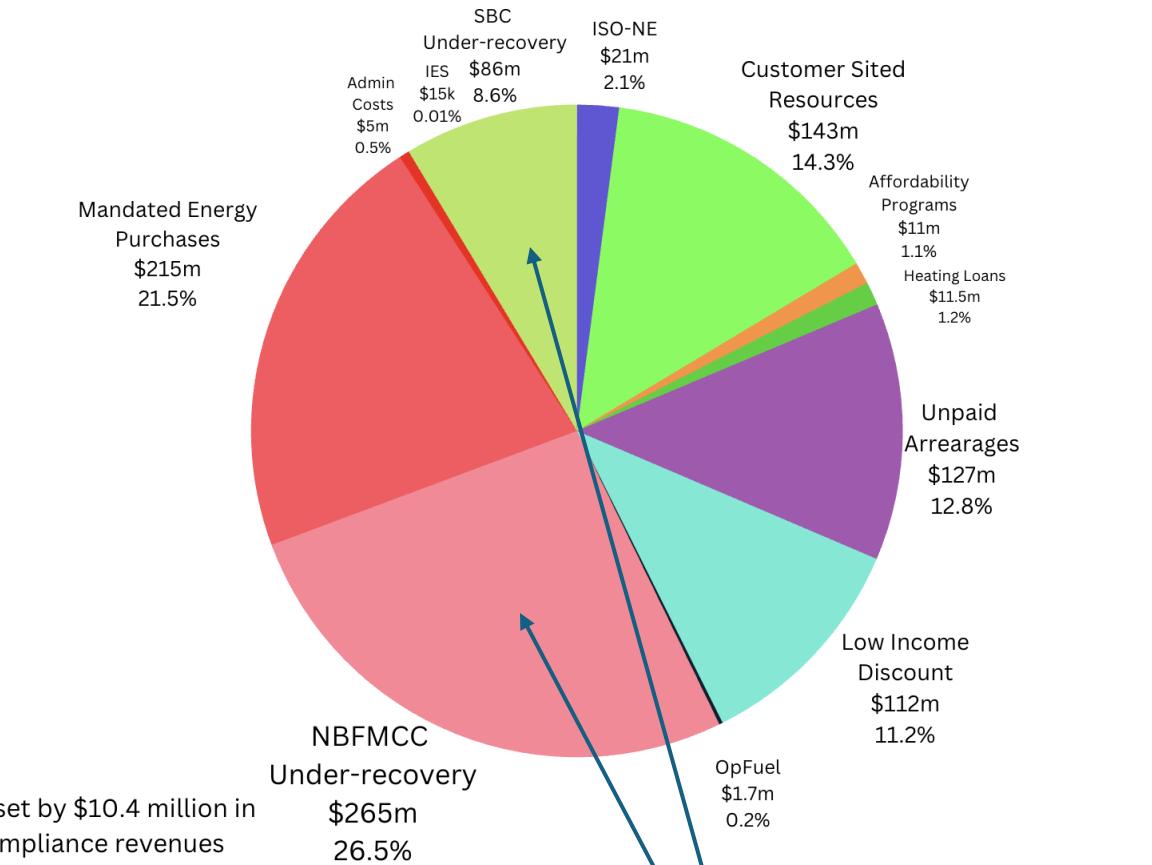


UI PUBLIC BENEFITS

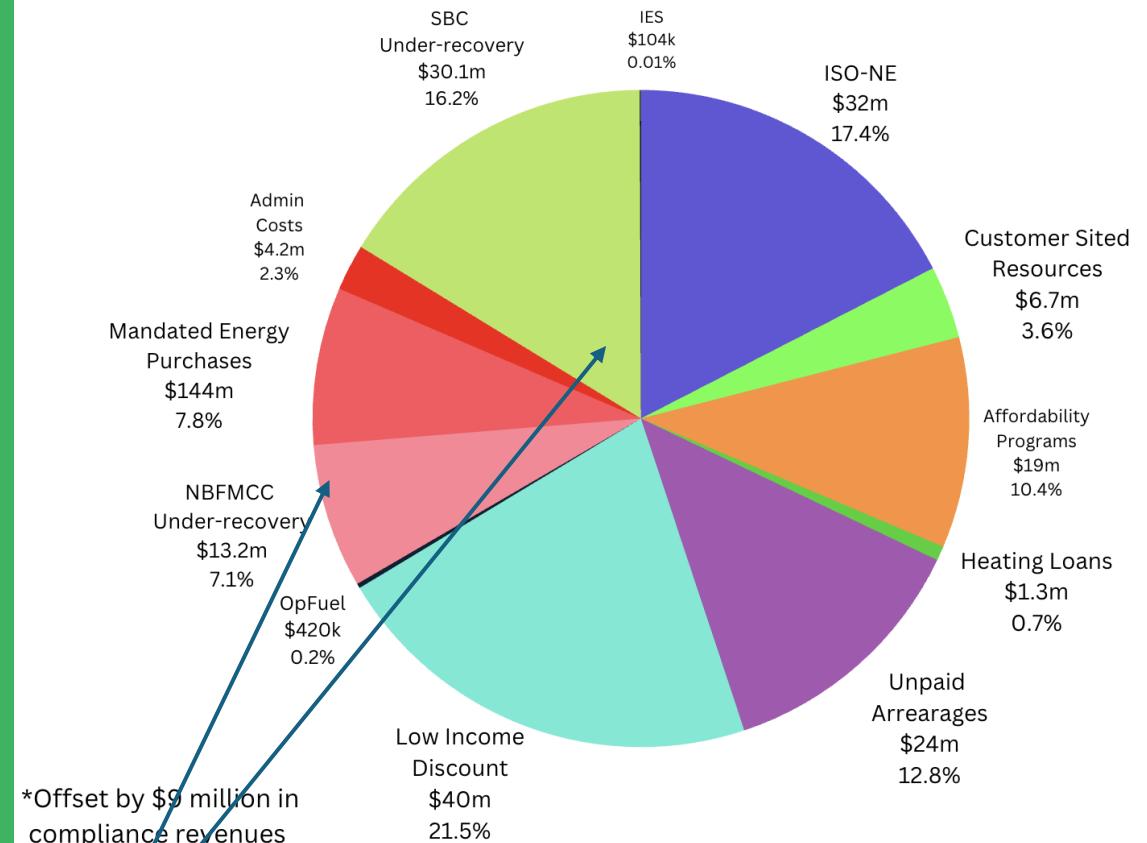


Breakdown of “Public Benefits” Category

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?

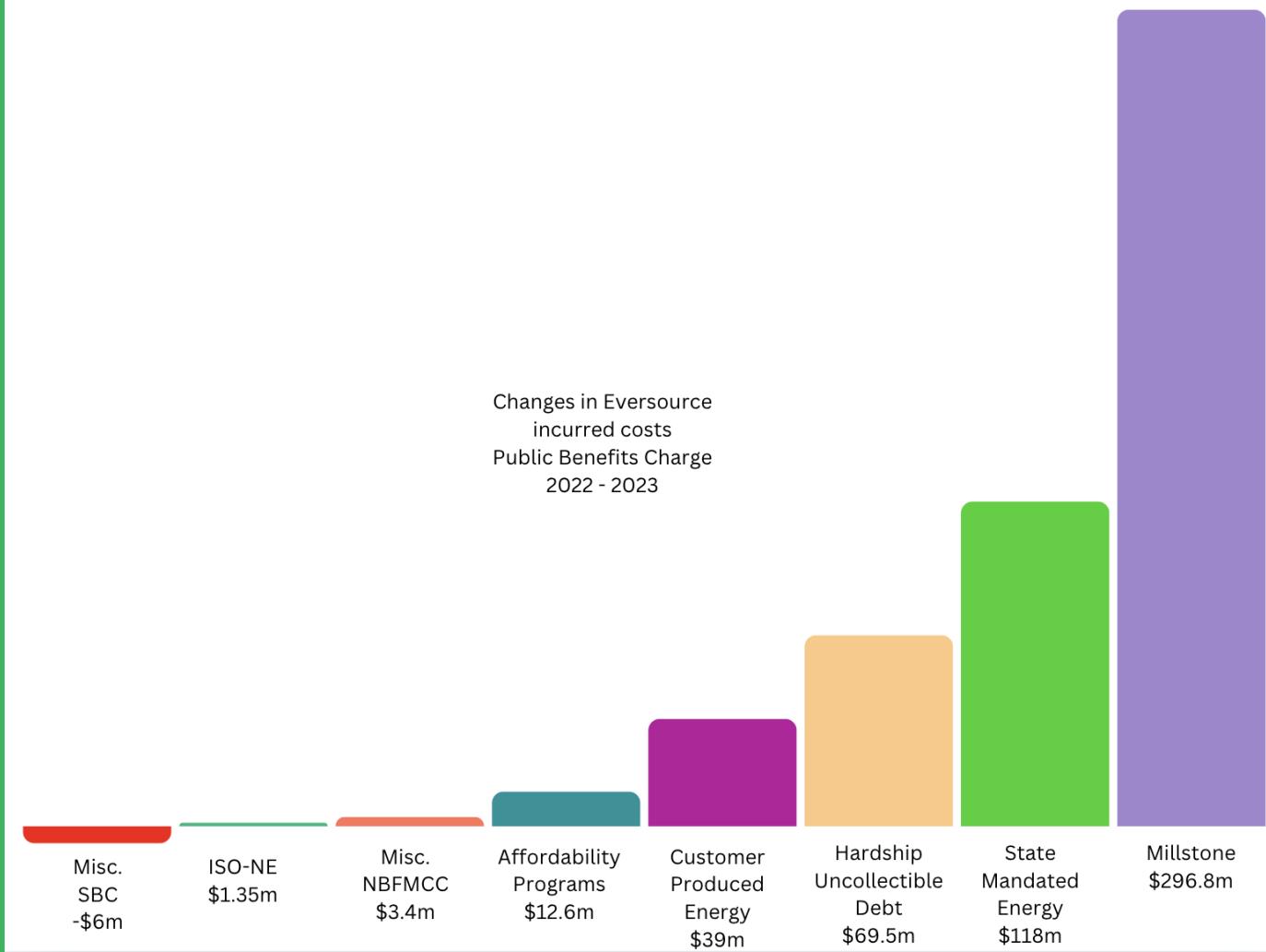
However, it is possible that rate revenues do not match actual expenses.

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?

