



# **PURA 2024 ANNUAL REPORT**

**February 19, 2025**



**Connecticut Public  
Utilities Regulatory  
Authority**

# TABLE OF CONENTS

<b>Introduction</b>	<b>1</b>
<b>Purpose of this Report</b>	<b>1</b>
<b>About PURA</b>	<b>2</b>
<b>History of PURA</b>	<b>3</b>
<b>PURA's Statutory Responsibilities</b>	<b>4</b>
<b>PURA's Organizational Structure</b>	<b>5</b>
<b>PURA's Public Engagement &amp; Outreach</b>	<b>7</b>
<b>PURA's Docket Database</b>	<b>9</b>
<b>2024 By the Numbers</b>	<b>10</b>
<b>Section 1: Rate Case Updates</b>	<b>11</b>
• <i>Revenue Decoupling</i>	<b>12</b>
• <i>Rate Cases vs. Electric Rate Adjustment Mechanisms (RAM)</i>	<b>13</b>
<b>Completed Rate Cases</b>	<b>14</b>
• <i>Connecticut water Company Rate Case (Dkt. No. 23-08-32)</i>	<b>15</b>
• <i>Avangrid Gas Rate Cases (Docket No. 23-11-02)</i>	<b>15</b>
<b>Active Rate Cases</b>	<b>17</b>
<b>Additional Rate Cases on the Horizon</b>	<b>19</b>
<b>PURA Video Tutorials about Rate Cases</b>	<b>19</b>
<b>Section 2: Performance Based Regulation</b>	<b>21</b>
<b>The Expanding Scope of Utility Regulation</b>	<b>21</b>
<b>PBR Investigations in Connecticut</b>	<b>23</b>
• <i>PBR Phase 1 Summary (Docket No. 21-05-15)</i>	<b>23</b>
• <i>PBR Phase 2 Progress in 2024</i>	<b>24</b>
<b>Section 3: The Electric Sector</b>	<b>31</b>
• <i>Electric Supply Costs</i>	<b>32</b>
<b>Key Electric Sector Topics in 2024</b>	<b>33</b>
• <i>Affordability: Annual Rate Adjustment Mechanisms</i>	<b>33</b>
• <i>Reliability: Storm and Emergency Event Planning</i>	<b>35</b>
<b>Table of 2024 Electric Sector Decisions</b>	<b>39</b>

<b>Section 4: The Natural Gas Sector</b>	<b>42</b>
<b>Key Natural Gas Sector Topics in 2024</b>	<b>43</b>
• <i>Updates to Connecticut's Gas Pipeline Safety Regulations</i>	<b>44</b>
• <i>Lost and Unaccounted for Gas Report (LAUF Gas)</i>	<b>45</b>
<b>Table of 2024 Natural Gas Sector Decisions</b>	<b>49</b>
<b>Section 5: The Water Sector</b>	<b>50</b>
<b>Key Water Sector Topics in 2024</b>	<b>51</b>
• <i>Water Conservation</i>	<b>51</b>
<b>Table of 2024 Water Sector Decisions</b>	<b>55</b>
<b>Section 6: The Telecomm. &amp; Utility Pole Sector</b>	<b>58</b>
<b>Key Telecomm. &amp; Utility Pole Topics in 2024</b>	<b>59</b>
• <i>Enabling Broadband</i>	<b>59</b>
• <i>Utility Pole Safety</i>	<b>60</b>
• <i>Ensuring Continuity of Public Telecommunication Resources</i>	<b>62</b>
• <i>Maintaining Standards of Service</i>	<b>65</b>
<b>Table of 2024 Telecomm. &amp; Utility Pole Sector Decisions</b>	<b>67</b>
<b>Section 7: Grid Modernization</b>	<b>68</b>
<b>Key Grid Modernization Topics in 2024</b>	<b>70</b>
• <i>Progress Advancing Energy Affordability</i>	<b>71</b>
• <i>Progress Enabling Decarbonization</i>	<b>83</b>
• <i>Progress Supporting Resilience and Reliability</i>	<b>85</b>
• <i>Progress Growing the Green Economy</i>	<b>91</b>
<b>2024 Clean &amp; Renewable Energy Program Updates</b>	<b>101</b>
<b>Table of 2024 Grid Modernization Decisions</b>	<b>103</b>
<b>Section 8: The Office of Education, Outreach, &amp; Enforcement</b>	<b>104</b>
<b>EOE Organization</b>	<b>104</b>
• <i>Licensing &amp; Certification Unit</i>	<b>104</b>
• <i>Mediation &amp; Enforcement Unit</i>	<b>106</b>
• <i>Education &amp; Outreach Unit</i>	<b>110</b>
<b>Working Group Participation</b>	<b>112</b>

<b>Section 9: Legislative Updates</b>	<b>115</b>
<b>Updates on 2024 Legislation</b>	<b>115</b>
<b>PURA 2024 Annual Reports to the General Assembly</b>	<b>117</b>
<b>Section 10: Status of Decisions in Appeal</b>	<b>118</b>
<b>The Decision Appeal Process</b>	<b>118</b>
<b>PURA Decisions in Appeal</b>	<b>119</b>
<b>Appendix 1 - Standard Docket Procedure Guide</b>	<b>124</b>
<b>Appendix 2 - 2024 PURA Decisions - Excel File</b>	<b>Attchd.</b>
<b>Appendix 3 - 2024 Clean &amp; Renewable Energy Report</b>	<b>Attchd.</b>



# INTRODUCTION

## PURPOSE OF THIS REPORT

Since the Public Utilities Regulatory Authority (PURA or the Authority) was established through Connecticut Public Act 11-80, An Act Concerning the Establishment of the Department of Energy and Environmental Protection and Planning for Connecticut's Energy Future, PURA's mission continues to evolve. In addition to ensuring that Connecticut's investor-owned utilities, including the state's electric, natural gas, and water companies, provide safe, clean, reliable, and affordable service, PURA also now oversees programs, policies, and tariff designs that advance the state's energy, economic, and climate goals. These responsibilities play a vital role in ensuring public health and safety and a robust economy in Connecticut.

Given the growing importance of enhancing utility service and achieving the state's climate goals, transparent communications and accessible stakeholder resources have become increasingly important, not just for frequent participants in PURA's processes, but also for elected officials, policymakers, and members of the public alike. In recent years, the Authority has launched multiple new efforts to improve communication and engagement with the public and stakeholders that engage in, or are affected by, PURA's proceedings. Notably, in 2020, the Authority established the Office of Education, Outreach, and Enforcement (EOE), which is tasked with directly engaging with non-traditional stakeholders on matters before PURA and fielding and working to resolve ratepayer complaints and inquiries. More recently, the Authority established [a program](#) to provide compensation to underrepresented groups to participate in PURA processes.

PURA also offers many educational resources available to the public and stakeholders such as its [Quarterly Newsletters](#).

[rate case video series](#), [live-streamed events](#), [PURA 101 Workshops](#), and this report ([Annual Report or Report](#)). This Annual Report provides a concise summary of the Authority's work completed in the previous year, and shares insights into the year ahead. It provides both quantitative metrics on the Authority's work, as well as abridged versions of key decisions across all of the industries regulated by PURA. The Report is organized around the key public utility service sectors that PURA regulates, with a section for each sector and additional sections providing a specific overview of the Authority's high impact work on rate cases, performance-based regulation, and PURA's [Equitable Modern Grid Initiative](#).

The Annual Report also summarizes the reports submitted to the General Assembly in the previous year and provides progress updates on specific PURA investigations required by recent legislation. Additionally, the Annual Report includes an update on the work of EOE and on all appeals of prior PURA decisions. Finally, the Annual Report addresses major upcoming topics in the current year, such as new program launches, anticipated rate proceedings, and the transition to performance-based regulation.

The Authority uses this Report to increase stakeholder engagement with and awareness of ongoing and future proceedings. As a quasi-judicial agency, PURA can only make decisions based on the record evidence placed before it in any given proceeding. The Authority's decisions affect a wide variety of stakeholders both directly and indirectly and are, therefore, made more robust with increased awareness and participation from all stakeholders. The Annual Report will evolve year-over-year, based on feedback received by the Authority, in order to best communicate with all stakeholders.

## ABOUT PURA

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The Public Utilities Regulatory Authority (PURA or the Authority) is a quasi-judicial agency that interprets and applies the statutes and regulations governing Connecticut's investor-owned electric, natural gas, water, and telecommunications utility companies. These electric, gas, and water companies are granted an "exclusive franchise right" to a specific territory or territories by the General Assembly because they meet the criteria for what is known as a "natural monopoly."

Electricity, natural gas, water, and some telecommunications services are all examples of industries that may qualify as a natural monopoly. Under a natural monopoly, there is only one set of infrastructure that services all customers who all share the costs.

### **What does "Quasi-Judicial" mean?**

This means that PURA's decisions are legally binding on the utilities it regulates.

Importantly however, being granted an exclusive franchise right comes with conditions. In exchange for this right, a utility consents to regulation, including meeting required standards of service.

The Authority is statutorily charged with ensuring that Connecticut's investor-owned utilities provide safe, clean, reliable utility service at affordable rates. During a distribution rate proceeding, PURA reviews utility's capital and operating expenses to ensure that they were incurred prudently. Then, PURA incorporates these costs, along with a reasonable rate of return derived based on evidence considered during a rate proceeding, into rates.

## HISTORY OF PURA

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PURA replaced the former Department of Public Utility Control (DPUC) and, along with the Bureau of Energy and Technology Policy, is part of the Energy Branch of the Department of Energy and Environmental Protection (DEEP). DEEP was created in July 2011 and brought together the state's Department of Environmental Protection (DEP), the DPUC, and an energy policy group that had been based at the Office of Policy and Management. However, the history of PURA and utility regulation extends far beyond the last fifteen years and the utilities we recognize today.

In the early to mid-nineteenth century, the expansion of railroads enhanced transportation access for people and the distribution of goods and services across the nation. Quickly, it became clear that it was in the public interest to implement safety regulation and monitoring of these railroads and in 1853, the Connecticut General Assembly established a commission of three general railroad commissioners to ensure compliance with safety regulations.[1]

Over time, the jurisdiction of this commission expanded to address issues of safety, property rights, eminent domain, and more. In 1894, the U.S. Supreme Court affirmed previous court rulings and stated that “while railroad corporations are private corporations... distinguished from those created for...governmental purposes, their uses are public, and they are invested with the right of eminent domain, only to be exercised for public purposes,” and “therefore they are subject to legislative control in all respects necessary to protect the public against danger, injustice, and oppression. Most importantly, the Supreme Court confirmed that “the state has the power to exercise this control through boards of commissioners.”[2]

By 1901, the commission was responsible for approving new locations for lines, certifying them as safe, conducting regular safety inspections, investigating complaints, petitions, and accidents, conducting research on emerging technologies, and submitting reports to the Connecticut legislature. The commission would hold hearings, provide legal notices, receive testimony, and issue decisions; all activities familiar to PURA today.[3]

Not long after, the increasing numbers of electric, gas, water, telegraph, and telephone companies brought the need for increased regulation and an agency with an expanded scope. On September 9, 1911, in accordance with Public Acts 1911, chapter 128, the Board of Railroad Commissioners became the new Public Utilities Commission.

In 1975, the General Assembly created the Public Utilities Control Authority from the former Public Utilities Commission. In 1979, this became the Division of Public Utility Control in the Department of Business Regulation and, in 1980, was made an independent department called the Department of Public Utility Control (DPUC).

The DPUC was charged with regulating the electric, gas, water, and telephone industries. The department was subsequently given jurisdiction over cable TV and telecommunications companies, while its jurisdiction over bus, trucking, and livery companies was transferred to the Department of Transportation. It had also been given responsibility for “Call Before You Dig” and began administering certain other programs.

Historically, DPUC set utility rates based on costs, with companies allowed to earn a DPUC-authorized rate of return on their investments. As the legislature opened specific industries to competition, it allowed DPUC to implement alternative forms of regulation for those services that are not fully competitive.

Finally, the DPUC was eliminated in July 2011 and all agency functions were moved under the Department of Energy and Environmental Protection and renamed as the Public Utilities Regulatory Authority, which is commonly known today as PURA or the Authority.

## **PURA'S STATUTORY RESPONSIBILITIES**

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Among other things, PURA is authorizes adjustments to the distribution rates charged by investor-owned utilities, advances the modernization of the electric distribution system, sets rates for customer-owned renewable energy resources, regulates the retail electric supplier market, implements federal requirements for natural gas pipeline safety, ensures adequate water system infrastructure investments, reviews mergers and acquisitions, provides education and outreach for consumers, and regulates the expansion of certain telecommunications infrastructure.

The majority of key statutes that govern the work of PURA are found in Title 16 of the General Statutes of Connecticut, “Public Service Companies.” Several of the most-referenced statutes are summarized by Table 1 below.

**Table 1: PURA's Governing State Statutes**

Statutory Section	Purpose
§ 16-9	Governs the issuance of orders by PURA.
§ 16-11	Requires PURA to regulate the condition of the plant, equipment and manner of operation of all public service companies. Enables PURA to order reasonable improvements, repairs, or alterations to companies' plant or equipment or changes to the manner of operation as necessary in the public interest.
§ 16-18	PURA has jurisdiction over the method and manner of construction of wire, poles, conductors, and fixtures for the transmission of electricity.
§ 16-19	Establishes PURA's ratemaking authority.
§ 16-19e	Sets forth the principles PURA must apply when regulating public service companies.
§ 16-41	Authorizes PURA to issue civil penalties.
§ 16-43	Requires public service companies to obtain approval prior to taking certain actions (listed in the statute).
§ 16-244i	Requires PURA to oversee quality and reliability of electric service. Obligates the electric distribution utilities to provide safe and reliable service to customers, among other things.
§ 16-245	Establishes PURA's authority to regulate electric suppliers.

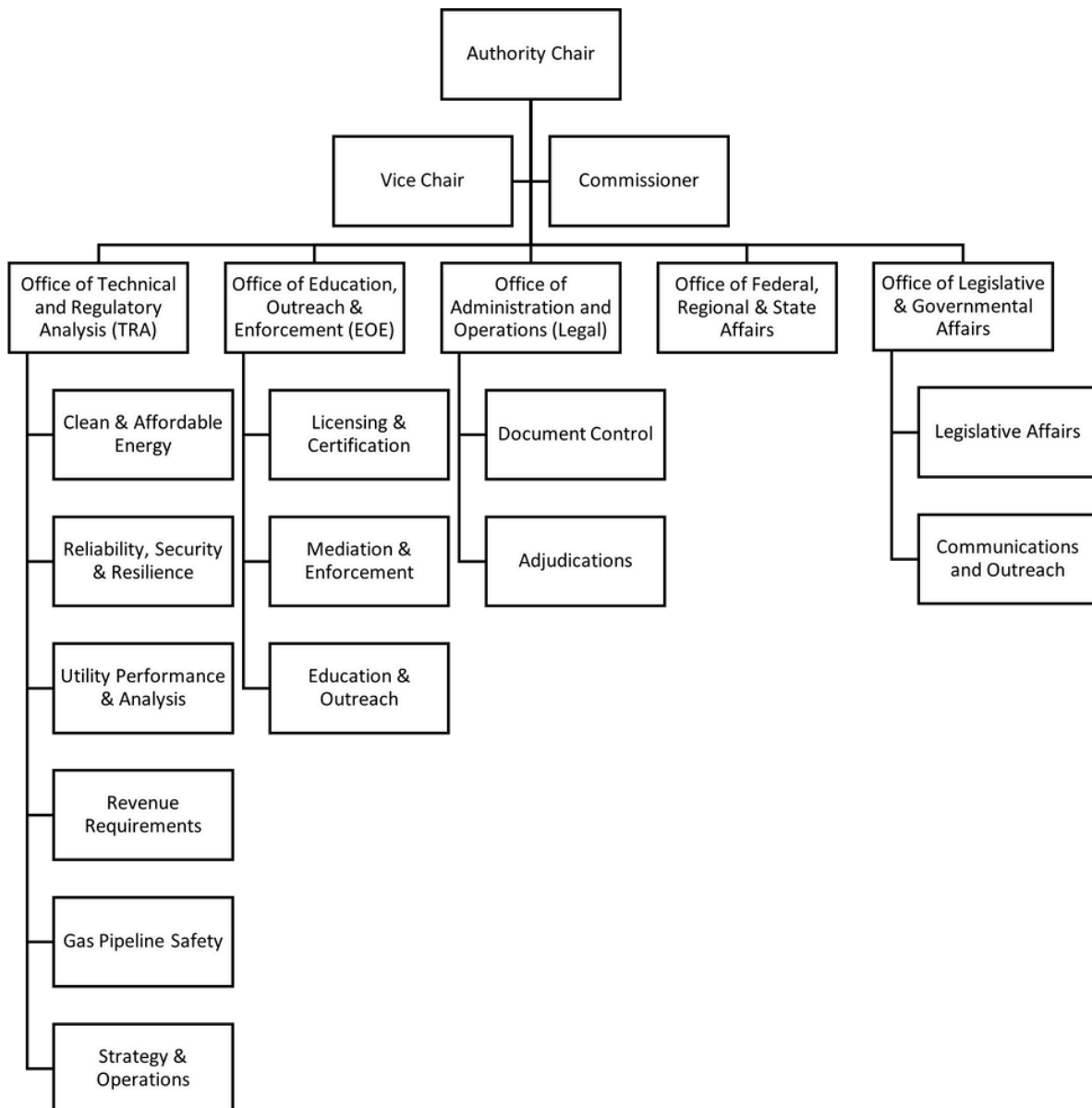
## PURA'S ORGANIZATIONAL STRUCTURE

All matters and proceedings before the Authority are presented to a panel of PURA's Commissioners. Each Commissioner is appointed by the Governor, typically to a four (4) year term, with consent from the legislature.

The Authority staff assist the commissioners in reviewing evidence submitted into the record, issuing information requests like interrogatories and conducting cross examination during hearings, and propose recommended decisions to the commissioner panel. A decision on a particular proceeding is reached by a majority vote among the three commissioners.

PURA's staff are currently organized into five distinct offices, as shown in Figure 1 below:

**Figure 1: PURA's Operational Organization**



All docketed work that is primarily technical in nature (i.e., adjudicated investigations) is assigned to the Office of Technical and Regulatory Analysis (TRA), which supports the technical and substantive elements of each of the sectors included in this Report. Other docketed work that is primarily legal in nature is assigned to the Office of Administration and Operations, which houses PURA's Adjudications unit. Together, TRA and the Office of

Administration and Operations are known as “decisional staff”.[4]

Each docket is assigned technical staff from TRA based on expertise, and at least one legal advisor (attorney) from the Office of Administration and Operations, with other staff assisting as necessary and appropriate. Other matters, such as routine licensing, dispute mediation, or enforcement, are assigned to the Office of Education, Outreach, and Enforcement (EOE). As discussed in greater detail in Section 8, EOE staff are separate from TRA Staff and are subject to ex parte limitations in communicating with other Authority staff. This allows EOE to also participate in PURA dockets as a separate party, particularly when a docket is related to rate amendments, performance-based regulation, or other alternative forms of regulation.[5]

The Office of Legislative & Governmental Affairs serves as PURA’s primary contact for the Connecticut General Assembly, news media, and other interested stakeholders. The office handles all inquiries and interview requests from these parties to ensure the Authority’s goals, services, activities, and programs are communicated in an accurate, transparent, and timely manner to the benefit of Connecticut ratepayers.

Finally, the Office of Federal, Regional, and State Affairs monitors the federal, interstate, and interregional policies that affect the wholesale energy market, and the reliability and security of energy transmission. This team is also tasked with matters related to in-state siting, including representing the PURA chairperson as her designee to the Connecticut Siting Council and serving as technical staff in reviewing relevant applications (e.g., construction method and manner applications).

## PURA'S PUBLIC ENGAGEMENT & OUTREACH

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The Authority’s work impacts all of Connecticut’s businesses and residents, making outreach to the public essential. Ensuring that stakeholders can provide input into PURA’s proceedings is critical to preparing robust, and equitable decisions. In 2023, legislation was passed granting PURA with expanded resources to equitably increase engagement with stakeholders, which PURA has begun to implement.

Most significantly, Section 15 of Public Act 23-102, An Act Strengthening Protections for Connecticut’s Consumers of Energy, (Public Act 23-102) directed PURA to establish a process for awarding compensation to eligible stakeholder groups for participation in certain proceedings of the Authority. Specifically, this legislation authorized PURA to distribute up to \$1.2 million per year across proceedings. This important provision will help stakeholders who otherwise do not have the financial resources or time necessary to participate in PURA proceedings ensure that their perspectives are represented before the Authority. Stakeholder groups eligible for this funding include those representing residential customers who live in environmental justice communities, residential hardship customers, small business customers, or nonprofits representing any of those groups. Through Docket No. 23-09-34, PURA Implementation of the Stakeholder Group



Compensation Provisions of Section 15 of Public Act 23-102, (Stakeholder Compensation Docket) PURA established the formal process for groups applying for and being awarded funds. The program officially began accepting applications for funding in dockets opened in 2024. Since then, the Authority has allocated or awarded \$223,000 to five different stakeholder groups and anticipates greater participation as awareness grows.

In addition to the stakeholder compensation provisions, Section 30 of Public Act 23-102 authorized PURA to provide up to \$1 million per year to organizations or individuals providing legal assistance to residential customers negotiating bill or arrearage payment agreements with their utilities. As discussed in Section 7: Grid Modernization, PURA continues to focus on ensuring that there are effective and fair solutions and programs available to customers who have unpaid bills, and/or cannot afford their utility bills. These funds will make sure that vulnerable customers who need further assistance navigating these programs can access appropriate resources. The Authority established the Customer Legal Advisory Services (CLAS) Program through Docket No. 23-11-04, PURA Implementation of the Legal Services Funding Provisions of Section 30 of Public Act 23-102, on July 10, 2024. The Authority conducted a request for qualifications to identify providers of legal services in the fall of 2024, and approved three organizations: Connecticut Legal Services, Connecticut Veterans Legal Services, and the Center for Children's Advocacy. As of January 1, 2025, these three firms are available to support customers with participating in bill or arrearage assistance programs offered by Connecticut utilities.

While these two programs will advance equity and stakeholder participation, the Authority strives to continue identifying additional measures to improve communications, accessibility, and participation in its proceedings. On September 17, 2024, the Authority announced the launch of a new proceeding in Docket No. 24-09-07, Equity, Accessibility, and Stakeholder Engagement (EASE). Through this proceeding, PURA will investigate topics including how PURA can make stakeholder participation in dockets easier and more efficient, and what information PURA could provide to help consumers understand regulated utilities. To assist with this proceeding, PURA has retained a consulting firm with significant expertise in both equity and utility regulation to facilitate focus groups and research. This proceeding will conclude with a framework and strategies for enhanced equity in proceedings.

These efforts are in addition to multiple public outreach and engagement efforts implemented by the Authority in recent years, including the creation of [educational videos](#), the publication of [quarterly newsletters](#) that highlight recent decisions and upcoming procedural events, and the [PURA 101 Roadshow](#), which brings live engagement to public audiences statewide. The Authority is committed to ongoing education and will continue to modify and enhance its resources to best serve the needs of the public.



## PURA'S DOCKET DATABASE

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All documents related to each docket's procedural record are filed in PURA's online docket database. To search the record of any docket, simply type the docket number into the search box. To access the database, click the button to the right.

[Access PURA's  
Docket Database](#)



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[1] Public Acts, 1853, chapter 74.

[2] NEW YORK & N E R CO v. TOWN OF BRISTOL, 151 U.S. 556 (1894)

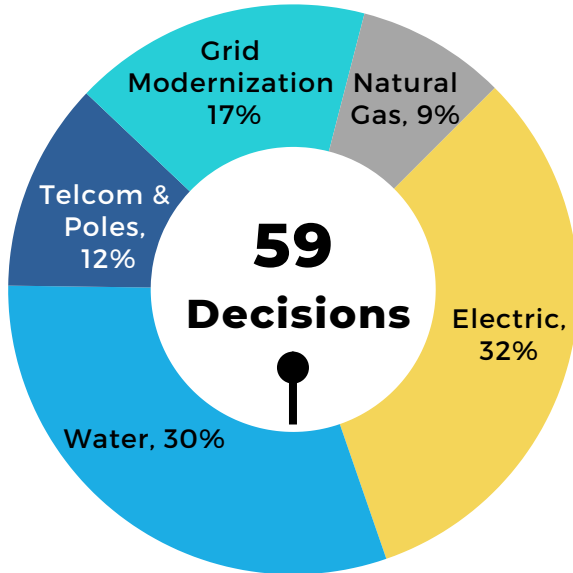
[3] CT State Library - Board of Railroad commissioners records.  
<https://cslarchives.ctstatelibrary.org/repositories/2/resources/427>

[4] Decisional staff work directly with the PURA Commissioners on decisions and, therefore, are subject to the Authority's prohibition on ex parte communications (i.e., decisional staff are unable to discuss substantive matters related to an open investigation with docket Parties, Intervenors, or Participants).

[5] General Statutes § 16-19(a) states that the Authority may require a portion of its staff to serve as a party to any proceeding. General Statutes § 16-19j(b) mandates that such an assignment shall occur when the proceedings relate to: (1) a rate amendment proposed pursuant to section 16-19 by a public service company having more than seventy-five thousand customers; (2) the approval of performance-based incentives pursuant to subsection (b) of section 16-19a; or (3) the approval of any alternative form of regulation pursuant to section 16-247k.

# 2024 BY THE NUMBERS

Metrics and data tracking are essential tools to understanding trends and progress. The below are key quantitative statistics related to PURA's work product and other activities in 2024, included to help stakeholders better understand PURA's roles & responsibilities.



**59**  
**Decisions**

## Contains:

- 19 Annual Reviews
- 2 Major Rate Cases
- 2 New Program Designs

**Over 2,000**

Total pages of  
analysis across  
decisions

**+253**

Additional Licensing,  
Certification, and  
Submetering Application  
Decisions



## Stakeholder Engagement Efforts

- 41 opportunities for written comments
- 50 Technical Meetings
- 42 Hearings
- 2 unique public engagement events
- 12 PURA 101 [Workshops](#)
- 9,447 customer complaints addressed

**79**

Total  
Staff

**321 | 202**

Dockets Dockets  
Opened Closed

**1,405**

Motion  
Rulings

## Includes:

**\$2.1M**  
to financial  
hardship  
programs

**\$426k**  
In payments to  
Operation Fuel

## Issued \$3M in Fines

**\$10k**  
EOE  
Enforce-  
ment

**\$188k**  
CBYD

**\$616k** Gas  
Pipeline  
Safety

**\$2.15M**  
Electric  
Suppliers

# SECTION 1: RATE CASE UPDATES

One of the core functions of PURA is regulating the distribution rates of Connecticut's investor-owned electric, natural gas, and water utility companies. These companies are granted monopoly franchise rights over the distribution and delivery infrastructure of their respective services because they are considered to have the characteristics of a natural monopolies. As a result, the role of the regulator is to serve as a proxy for the forces of competition to balance this monopoly control and ensure that the companies provide safe, adequate, and reliable service to customers at affordable rates. Specifically, PURA regulates the rates utilities charge customers to recover the costs of owning and maintaining distribution infrastructure; while the cost of energy supply is instead a product of the New England regional wholesale market, which is regulated by the Federal Energy Regulatory Commission.

In order to amend its distribution rates, a utility company must file a detailed application with the Authority. PURA is statutorily charged with conducting an adjudicated proceeding to investigate any rate application. This investigation is called a "rate case" and is one of the core functions of the Authority. Connecticut law requires PURA to conduct a rate case for public service companies at certain intervals and within a certain amount of time. After receiving a rate application, PURA has 270 days to complete a rate case proceeding for water companies, and 350 days for electric and gas companies.

During each rate case, PURA's objective is to determine whether the rates proposed by the utility are just, necessary to meet reliability and safety standards, and reasonable, though, by law, it is the company's responsibility to prove that its proposed rates are just and reasonable.<sup>[1]</sup> Notably, this responsibility requires the company to provide more than mere assertions or documentation of expenses. Rather, the

company must provide credible and sufficient evidence and clear explanations that demonstrate that the proposed rate change is just and reasonable and that the costs arise from prudent and efficient management of the utility. The Authority is obligated to deny any portion of the company's request that is not proven to be just and reasonable, or is more than sufficient. Indeed, it is only in demonstrating that a requested rate is just and reasonable that the Authority can ensure that the public interest is protected as required by General Statutes § 16-19e.

Authority staff with expertise in accounting, finance, utility regulation, engineering, economics, and policy scrutinize the evidence provided by the company, starting with its proposed rate base. A utility's rate base includes the facilities, infrastructure, and other capital investments made by the utilities to supply safe, reliable, and cost-effective service to customers. Utilities finance these investments through a mixture of debt and equity, and then seek to recover these investments through rates paid by ratepayers. The Authority conducts a prudence review by analyzing the evidence provided by the utility and other parties to the rate case proceeding to ensure that all costs included in the rate base are reasonable. Specifically, the Authority carefully reviews all relevant filings, conducts public cross examination of technical experts and other witnesses in hearings, issues interrogatories (i.e., written questions directed at specific parties) in advance of those hearings, audits the financial reports filed by the companies, and reviews public comment.

In addition to recovering their rate base, utilities are also afforded the opportunity to earn a specified rate of return (ROE) on prudent investments through rates, as dictated by long-standing U.S. Supreme Court precedent.<sup>[2]</sup> The ROE is set by examining several factors including current economic and market conditions, analytical models and cost of equity capital methodologies, ROEs of similar companies in other jurisdictions, and the company's financial risk and credit rating.

The Authority then multiplies the rate base by the ROE and adds in any operations and maintenance expenses to determine the annual revenue for the utility, called the revenue requirement. The revenue requirement is what the utility is allowed to recover through various charges on customer bills. These charges can take various forms, including fixed customer charges (e.g., \$/customer), demand charges (e.g., \$/kW measured in a particular period), and volumetric charges (e.g. \$/kWh).

## Revenue Decoupling

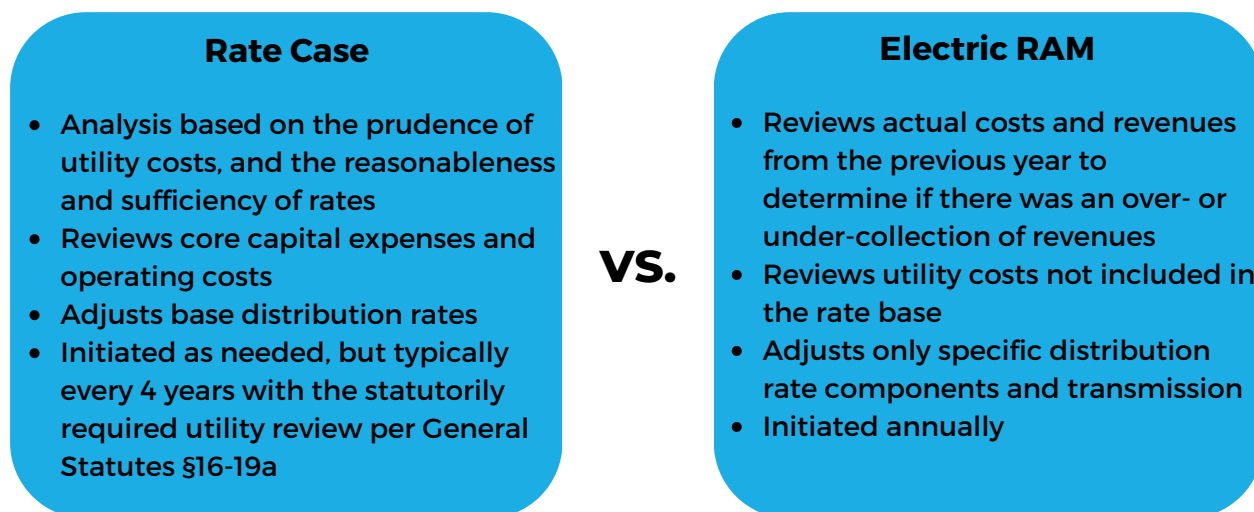
Any under- or over-collection of a utility's approved annual revenue requirement is subject to reconciliation pursuant to the state's revenue decoupling law. Decoupling ensures that the utility receives its annual revenue requirement, regardless of its annual sales. As such, decoupling disconnects utility revenue from consumption, thereby creating incentive for conservation efforts and other measures that reduce sales.

For electric and gas utilities, the reconciling rate component is known as the revenue decoupling mechanism (RDM). For water utilities, the reconciling rate component is known as the revenue adjustment mechanism (RAM, though, not to be confused with an electric rate adjustment mechanism described further below). The Authority reviews and compares a utility's revenue each year with its approved revenue requirement and authorizes a charge or credit, as appropriate, through the RDM or RAM, as applicable, to reconcile any difference from the preceding year. The charge or credit is applied for one year.

## Rate Cases vs. Electric Rate Adjustment Mechanisms (RAM)

The Authority also reviews rates recovered through additional cost recovery mechanisms. For electric and gas utilities, this includes a review of the charges related to the supply through the standard service and last resort offer for electric customers and the purchased gas adjustment for gas customers. For electric utilities this also includes a review of transmission and additional distribution-related charges through the annual rate adjustment mechanisms (RAM). Whereas a rate case is used to determine the expected revenue requirement a utility needs to recover the cost of providing safe and reliable distribution service, the electric RAM is used to recover and reconcile costs not included in base distribution rates. Included in the electric RAM for example are costs or revenues associated with clean energy programs directed by statute, arrearage management programs, and transmission costs, among other costs. These costs are reconciled on an annual basis and charged to customers through separate rate components that are included on the delivery side of customers' monthly bills.

**Figure 2: Understanding Rate Cases vs. Electric RAM Proceedings**



Ultimately, rate cases and rate adjustments are some of the most important tools that the Authority has because their outcomes affect all residents, businesses, critical infrastructure, and industries within a utility's service territory. For more information on

the 2024 electric RAM decisions, and how differences in expected and actual revenues are reconciled each year, see the discussion of the Rate Adjustment Mechanism in Section 3 below in this Report.

## COMPLETED RATE CASES

In 2024, the Authority completed full prudency reviews and issued decisions for the Connecticut Water Company (CWC) and both of Avangrid's natural gas companies, Connecticut Natural Gas (CNG) and Southern Connecticut Gas (SCG). The decisions for each of these companies are products of rigorous discovery and analysis described above, which included hundreds of interrogatories, weeks of hearings including hours of cross examination and testimony by topical experts, detailed audits of financial statements, and multiple public comment hearings. The Authority's decisions present the fulfilment of its duties to ensure that approved rates are sufficient to cover the companies' prudently incurred costs, and a reasonable rate of return, while protecting the public interest. Summaries of the decision dated June 28, 2024 in Docket No. 23-08-32, Application of Connecticut Water Company to Amend its Rate Schedule, (CWC Decision), and the decisions dated November 18, 2024 in Docket No. 23-11-02, Application of Connecticut Natural Gas Corporation and The Southern Connecticut Gas Company to Amend Their Rate Schedules (CNG Decision, SCG Decision, and together, Avangrid Decisions) are provided below.

**Table 2: 2024 Completed Rate Case Summary**

	Dkt. No 23-11-02 CNG	Dkt. No. 23-11-02 SCG	Dkt. No. 23-08-32 CWC
<b>Customers</b>	186,000	208,000	110,000
<b>Territory</b>	25 towns in southwestern CT	24 towns in southwestern CT	60 towns statewide
<b>Previously-Authorized Revenue Requirement</b>	\$442,112,779	\$436,004,126	\$118,245,047
<b>Previously-Authorized ROE</b>	9.30%	9.25%	9.00%
<b>Requested Revenue Requirement</b>	\$461,815,765	\$479,242,959	\$140,000,875
<b>Requested ROE</b>	10.2%	10.2%	10.5%
<b>Approved Annual Revenue Requirement</b>	\$417,502,324	\$425,288,190	\$124,700,031
<b>Approved ROE</b>	9.15%	9.15%	9.3%
<b>Other Details</b>	CNG must return \$24 million to ratepayers over the next three years, which is reflected in the approved annual revenue requirement.	SCG must return \$96 million to ratepayers over the next three years, which is reflected in the approved annual revenue requirement.	



## Connecticut Water Company Rate Case (Dkt. No 23-08-32)

On October 3, 2023, the Connecticut Water Company (CWC or Company) filed a rate application with PURA in accordance with General Statutes § 16-19 in Docket No. 23-08-32, Application of Connecticut Water Company to Amend its Rate Schedule (CWC Application).[3] CWC currently provides water service, including wastewater service, to approximately 110,000 customers in 60 Connecticut municipalities. CWC requested an ROE of 10.5%<sup>[4]</sup> and an annual revenue requirement of \$140,000,875, a 18.4% increase from the previously authorized revenue requirement.

The Authority conducted an extensive investigatory process involving three public comment hearings, several days of field audits and inspections, seven in-person days of evidentiary hearings, one late filed exhibit hearing, oral arguments, and the issuance of several hundred discovery requests (i.e., requests for further information). At the conclusion of that process, on June 28, 2024, the Authority issued a Decision approving an ROE of 9.30% and an annual revenue requirement of \$124 million for the rate year commencing on July 1, 2024. The authorized revenue requirement is an approximately \$16 million reduction from CWC's request.

[Read the CWC Rate Case Final Decision.](#)

## Avangrid Rate Case (Docket No. 23-11-02)

Avangrid Networks, Inc. (Avangrid) is the parent of UI and two gas companies in Connecticut, the Connecticut Natural Gas Corporation (CNG) and the Southern Connecticut Gas Company (SCG). On November 3, 2023, CNG and SCG each filed applications with PURA to amend their existing rates in accordance with General Statutes § 16-19, submitted in PURA Docket No. 23-11-02, Application of Connecticut Natural Gas Corporation and The Southern Connecticut Gas Company to Amend Their Rate Schedules. This was SCG's first fully adjudicated rate case since 2009, and CNG's first since 2014, as both had otherwise resolved rate amendments through settlement agreements once in the intervening years. In 2023, PURA directed both companies to file rate amendment applications or be subject to a financial audit. This proceeding therefore represented a particularly important opportunity for the Authority to complete a full and transparent investigation of the companies' operations, operating expenses, and capital costs. The Authority completed its review of both applications in this same docket and issued a final decision specific to each company on November 18, 2024. A summary of each decision and where to find further information is provided below.

### Connecticut Natural Gas (CNG)

CNG currently provides gas service to over 186,000 residential, commercial, and industrial customers in 25 towns and cities in the southwestern part of Connecticut. CNG's application included a requested ROE of 10.20%, and a revenue requirement of \$461,815,765, representing a 4.46% increase over the currently authorized revenues.

The Authority conducted an extensive investigatory process involving multiple rounds of pre-filed testimony, several days of field audits and inspections, three public comment hearings, 14 in-person days of evidentiary hearings, two days of late filed exhibit hearings, legal briefings and reply briefs, a draft decision, exceptions to the draft decisions and oral arguments, and the issuance of several hundred discovery requests (i.e., requests for further information). At the conclusion of that process, on November 18, 2024, the Authority issued a Final Decision, approving an ROE of 9.15% and an annual revenue requirement of \$417,502,324 for the rate year December 1, 2024 – November 30, 2025. Notably, however, reflected in this amount is the fact that the Company will be required to return to ratepayers approximately \$24 million of ratepayer money over the next three years; thus, the approved revenue requirement after such credits are fully returned is \$423,824,405.

The reduced ROE and revenue requirement were found to be appropriate as CNG has earned healthy returns since its last rate amendment (resolved via settlement agreement), including several periods of sustained over-earning. As previously discussed in this section, and throughout this report, it is PURA's duty to serve as the proxy for traditional market competition by investigating whether rates proposed by a regulated company are "are unreasonably discriminatory or more or less than just, reasonable and adequate, or that the service furnished by such company is inadequate to or in excess of public necessity and convenience," as required by General Statutes § 16-19(a). Further, the Company has the burden of proof to demonstrate that their proposed rates are reasonable. PURA determined that CNG did not meet its burden of justifying or providing sufficient evidence for the requested revenue requirement and ROE included in their application. This outcome protects the public interest by preventing customers from having to pay for costs that CNG did not sufficiently justify.

[Read the CNG Rate Case Final Decision.](#)

### ***Southern Connecticut Gas (SCG)***

SCG currently provides gas service to over 208,000 residential, commercial, and industrial customers in 24 towns and cities in the southwestern part of Connecticut. CNG's application included a requested ROE of 10.20%, and a revenue requirement of \$479,242,959, representing a 9.92% increase over the currently authorized revenues.

As with CNG, The Authority conducted an extensive investigatory process involving multiple rounds of pre-filed testimony, several days of field audits and inspections, 3 public comment hearings, 14 in-person days of evidentiary hearings, two days of late filed exhibit hearings, legal briefings and reply briefs, a draft decision, exceptions to the draft decisions and oral arguments, and the issuance of several hundred discovery requests (i.e., requests for further information). At the conclusion of that process, on November 18, 2024, the Authority issued a Final Decision, approving an ROE of 9.15% and an annual revenue requirement of \$425,288,190 for the rate year December 1, 2024 – November 30,



2025. Notably, however, reflected in this amount is the fact that the Company will be required to return to ratepayers approximately \$96 million of ratepayer money over the next three years; thus, the approved revenue requirement after such credits are fully extinguished is \$457,817,762.

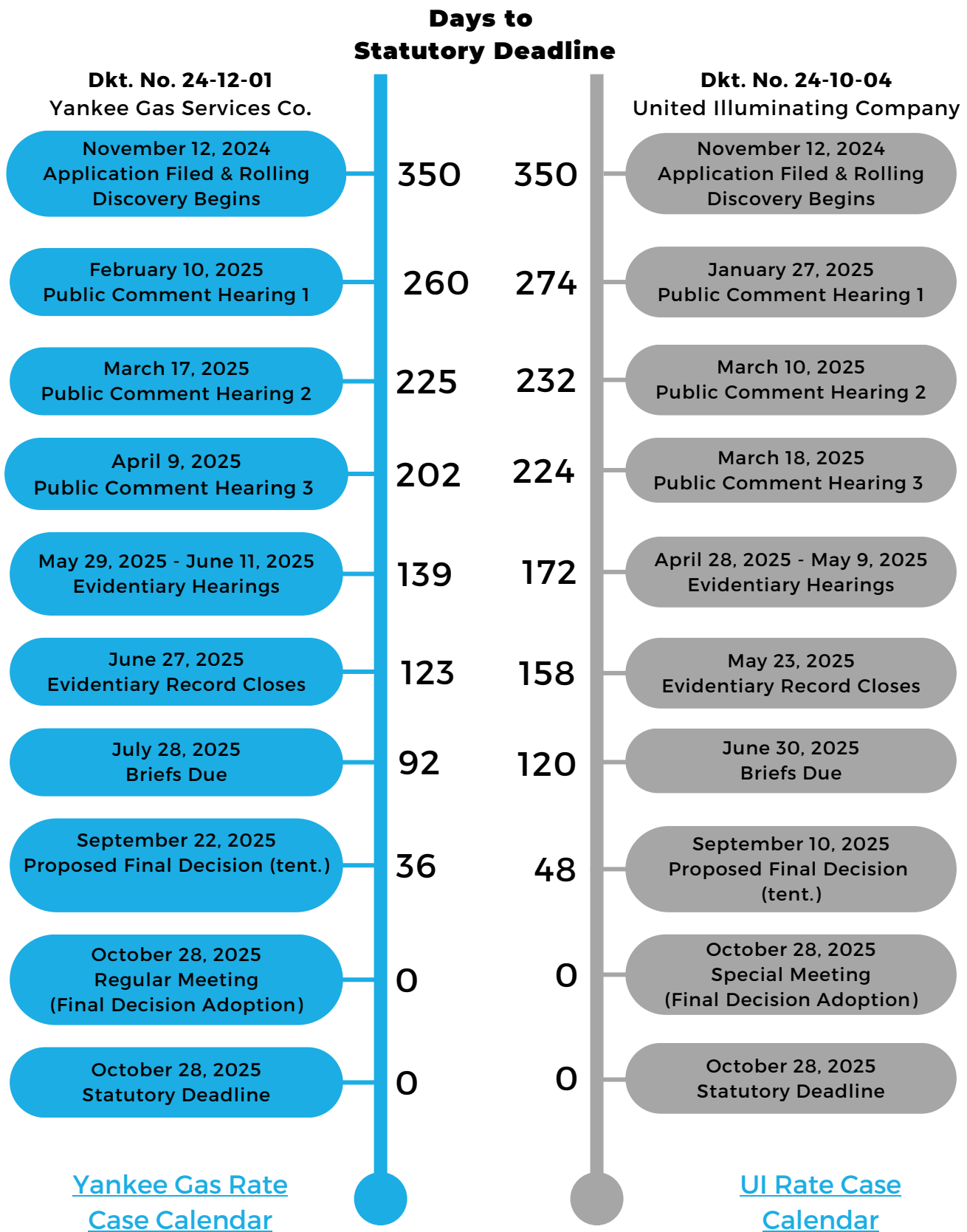
The reduced ROE and revenue requirement were found to be appropriate as SCG has earned healthy returns since its last rate amendment (resolved via settlement agreement), including several periods of sustained over-earning. As previously discussed in this section, and throughout this report, it is PURA's duty to serve as the proxy for traditional market competition by investigating whether rates proposed by a regulated company are "are unreasonably discriminatory or more or less than just, reasonable and adequate, or that the service furnished by such company is inadequate to or in excess of public necessity and convenience," as required by General Statutes § 16-19(a). Further, the Company has the burden of proof to demonstrate that their proposed rates are reasonable. PURA determined that SCG did not meet its burden of justifying or providing sufficient evidence for the requested revenue requirement and ROE included in their application. This outcome protects the public interest by preventing customers from having to pay for costs that SCG did not sufficiently justify.

[Read the SCG Rate Case Final Decision.](#)

## ACTIVE RATE CASES

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In 2024, PURA received rate case applications from Yankee Gas Services Company (YGS) and The United Illuminating Company (UI), filed on the same day. Robust public engagement and comment are priorities in both proceedings, as demonstrated by the multiple opportunities for public comment offered through live sessions conducted in the communities and also held virtually, during lunchtime and evening hours, and the opportunity to submit comments in writing at any time. Until a decision is reached in each docket, PURA is unable to comment substantively outside of the formal noticed proceedings; however, the procedural progress of each case is provided in the timelines below. Connecticut law requires that both electric and natural gas rate cases be completed within 350 days of receipt of the application.

**Figure 3: Active Rate Case Progress and Scheduled Next Steps**

## ADDITIONAL RATE CASES ON THE HORIZON

In the next twelve months, it is possible that additional public service companies may file rate amendment applications. As described above, rate cases provide an opportunity to both regulators and other stakeholders for careful scrutiny of all parts of a utility's business operation, which also helps improve transparency and accountability.

Though formal opportunities for public comment and participation will not be available until these rate cases are officially filed, PURA continues to emphasize the importance of proactive and transparent public engagement. Members of the public, legislators, representatives of various companies or industries, municipalities, and all other interested stakeholders are encouraged to view the [PURA rate case page](#) and to familiarize themselves with related resources on the various components of a rate case.

### PURA Video Tutorials About Rate Cases

Click the links in each circle to learn more.

**Overview of  
Rate Cases &  
Why They  
Matter to You**

**Ways to Get  
Involved In a  
Rate Case**

**The Why and  
How of  
Setting Utility  
Rates**

**Parties in a  
Rate Case**

**How is my bill  
affected by a  
rate case?**

**Review of  
Storm Costs in  
a Rate Case**

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[1] General Statutes § 16-22.

[2] The utility is also allowed to recover certain operations and maintenance costs, such as labor.

[3] CWC's last rate increase occurred in 2021, in Docket No. 20-12-30. Decision, July 28, 2021, Docket No. 20-12-30, Application of the Connecticut Water Company to Amend its Rate Schedules (July 2021 CWC Rate Case Decision); Decision, Nov. 17, 2021, Docket No. 20-12-30, Application of the Connecticut Water Company to Amend its Rate Schedules.

[4] The July 2021 CWC Rate Case Decision previously set the allowed ROE to a 9.00%.

## SECTION 2: PERFORMANCE BASED REGULATION

### THE EXPANDING SCOPE OF UTILITY REGULATION

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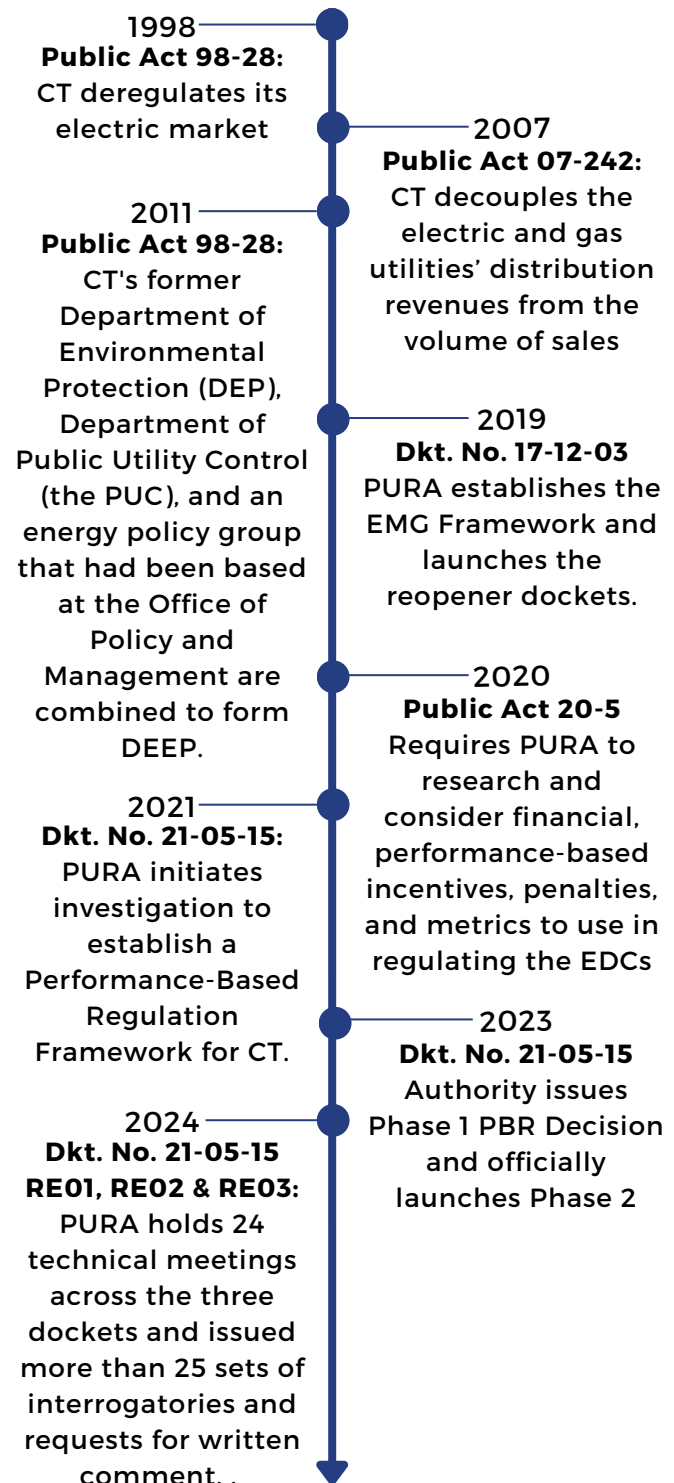
At both the national and state levels, the scope of utility regulation has expanded beyond safety, reliability, and affordability to now also include the cost-effective achievement of certain public policy goals as directed and informed by state legislatures. States across the country are implementing policies and programs to reduce greenhouse gas emissions and to modernize electric distribution systems. In Connecticut, Public Act 08-98, An Act Concerning Connecticut Global Warming Solutions, set a goal to reduce economy-wide emissions to 80 percent below the 2001 level by 2050. Additionally, the state legislature has directed PURA and the utilities to develop and implement multiple programs in pursuit of Connecticut's public policy goals. More recently, PURA catalyzed Connecticut's grid modernization efforts through the 2019 establishment of the Equitable Modern Grid Framework in Docket No. 17-12-03, PURA Investigation into Distribution System Planning of the Electric Distribution Companies (EMG Framework), deploying programs and regulatory procedures across a range of topics from reliability and resilience standards to energy storage solutions.

However, the legacy business model and operations of the EDCs are fundamentally at odds with such trends in public policy. The EDCs' ability to meet the core requirements of delivering safe, clean, reliable, and affordable electric service to customers is becoming increasingly complex and challenging in the midst of significant industry change and the present and future impacts of climate change. Technology advances and falling costs have accelerated the adoption of distributed energy resources (DERs), giving

customers greater control over their ability to generate and consume electricity independently from the grid. Additionally, the proliferation of DERs requires a more distributed electric grid that can better accommodate and manage bidirectional flows of energy and is likely to require additional investment to upgrade systems and infrastructure to optimally integrate and utilize these resources. Further, these conditions are all occurring against a backdrop of increasingly severe and frequent weather events.

Against this backdrop and in recognition of these trends, in 2020 the General Assembly enacted Public Act 20-5, An Act Concerning Emergency Response by Electric Distribution Companies, The Regulation of Other Public Utilities and Nexus Provisions for Certain Disaster-Related or Emergency-Related Work Performed in The State (Take Back our Grid Act). This landmark bipartisan legislation required PURA to, among other things, initiate a proceeding to research and consider financial, performance-based incentives, penalties, and metrics to use in regulating the EDCs. In other words, PURA is required to design a performance-based regulatory framework (PBR Framework) that cost-effectively incentivizes the EDCs to achieve the outcomes desired from Connecticut's electric grid, including but not limited to: reliability, safety, affordability, emergency responsiveness, cost-efficiency, equity, customer satisfaction, municipal engagement, resilience, and the advancement of the state's environmental and climate policy goals. This PBR Framework will provide a set of tools to reform legacy regulatory structures to enable innovations within modern power systems.

**Figure 4: Historical Evolution of Utility Regulation in Connecticut**



# PBR INVESTIGATIONS IN CONNECTICUT

## PBR Phase 1 Summary (Docket No. 21-05-15)

On May 25, 2021, the Authority 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 PBR framework in Connecticut. To help ensure a successful outcome, the Authority established a two-phase process. The purpose of Phase 1 was to: (1) consider regulatory goals and (2) desired public outcomes to inform a PBR framework; (3) evaluate the current regulatory framework in Connecticut to examine which incentive mechanisms and regulatory components may not be functioning as intended or are no longer aligned with the public interest, and to identify specific areas of utility performance that should be targeted for improvement; (4) assess which regulatory mechanisms can best address the specific areas of interest; and (5) identify specific performance metrics, where appropriate.

On April 26, 2023, the Authority issued a [Decision \(Phase 1 Decision\)](#) in Docket No. 21-05-15 concluding Phase 1 and establishing the official goals and priority outcomes of PBR in Connecticut, as shown by Table 3 below.

**Table 3: PBR Priority Outcomes Established in Phase 1**

Goals	Priority Outcomes
Excellent Operational Performance	<ul style="list-style-type: none"> <li>• Business Operations and Investment Efficiency</li> <li>• Comprehensive and Transparent System Planning</li> <li>• Distribution System Utilization</li> <li>• Reliable and Resilient Electric Service</li> </ul>
Public Policy Achievement	<ul style="list-style-type: none"> <li>• Social Equity</li> <li>• GHG Reduction</li> </ul>
Customer Empowerment and Satisfaction	<ul style="list-style-type: none"> <li>• Customer Empowerment</li> <li>• Quality Customer Service</li> </ul>
Reasonable, Equitable, and Affordable Rates	<ul style="list-style-type: none"> <li>• Affordable Service</li> </ul>

Additionally, the Phase 1 Decision formally launched PBR Phase 2 by initiating three reopener dockets, each focused on further investigating a distinct element of PBR:

- Docket No. 21-05-15RE01: Revenue Adjustment Mechanisms
- Docket No. 21-05-15RE02: Performance Mechanisms
- Docket No. 21-05-15RE03: Integrated Distribution System Planning

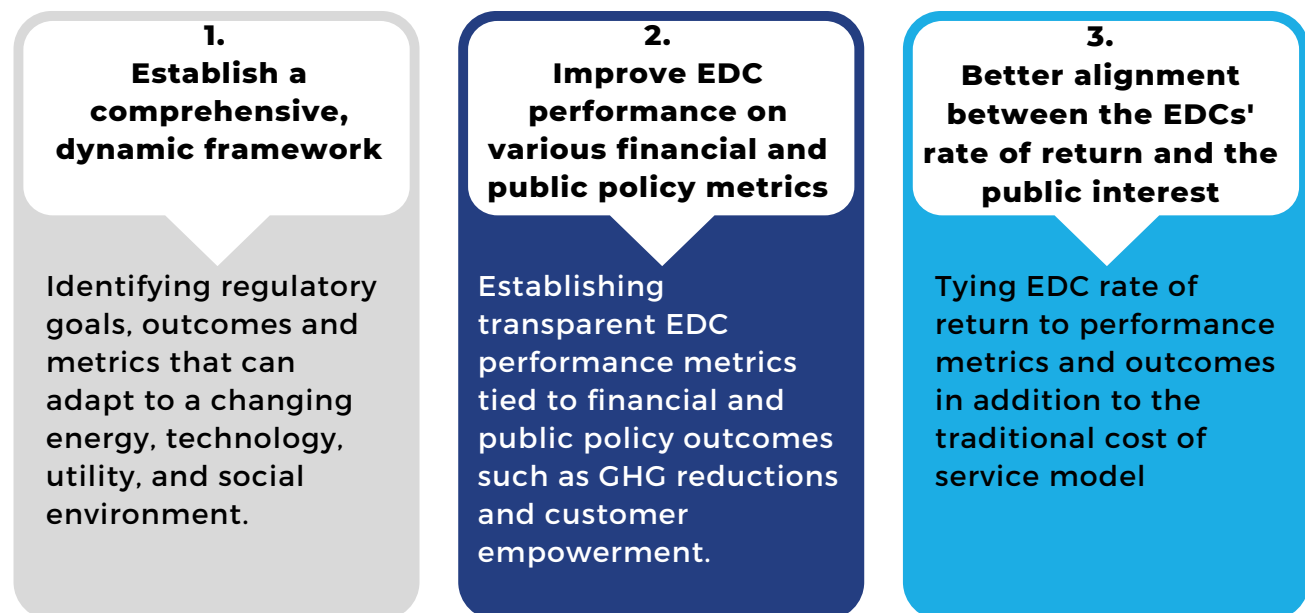
Through these three Phase 2 proceedings, the Authority continues to collaborate with stakeholders to streamline and/or refine elements of the existing regulatory framework,



develop incentive mechanisms to better address specific objectives or areas of utility performance, and implement other improvements to the regulatory framework that meet the goals and outcomes established in Phase 1.

The PBR Framework is anticipated to alter the way utilities are regulated in Connecticut. The legacy regulatory framework used to ensure safe and reliable electricity at reasonable prices from capital-intensive electricity monopolies is now adjusting to a wave of disruptive technological advances that impact the way utilities earn revenues and what value customers expect from their own EDC. Indeed, the Authority views PBR as a means to revisit the principles of utility regulation and to re-apply these core tenets in the context of an increasingly decarbonized, digitized, and distributed electricity system. The benefits of PBR converge around three main issues:

**Figure 5: Objectives of PURA's PBR Proceedings**



## PBR Phase II Progress in 2024

The Authority launched all three reopener PBR dockets in 2023 and has remained committed to advancing the PBR reopener dockets at an ambitious pace throughout 2024. However, a foundational element of each reopener, and the PBR investigation broadly, is that they encourage and rely upon diverse, robust, and comprehensive stakeholder participation. Without the time, input, and expertise of a diverse array of participants, such advancements in the state's regulatory reform would not be possible.

By June of 2024, PURA had already hosted more than 20 technical meetings, four working group meetings, eight written comment opportunities, and issued numerous interrogatories gathering invaluable insights and information. Two of the technical meetings in particular, Technical Meeting No. 8 in Docket No. 21-05-15RE01 and No. 5 in Docket No. 21-05-15RE02, yielded particularly productive dialogue. These meetings, both



held in early June, were conducted in a “roundtable” style, which supported significant engagement and discussion between stakeholders. The Authority concluded that the roundtable discussion format paired with additional discovery presented an opportunity to delve further into the necessary details for successful future implementation of Connecticut’s emerging PBR Framework.

Accordingly, the Authority revised the procedural schedules of Docket Nos. 21-05-15RE01 and 21-05-15RE02, extending each by approximately six months to accommodate an additional 12 roundtable technical meetings. The schedule in Docket No. 21-05-15RE03 remains underway as well and is expected to conclude in Q3 of 2025. A summary of each reopener’s objective, and the technical meetings (i.e. roundtables) held throughout 2024, is provided below.

### ***Docket No. 21-05-15RE01: Revenue Adjustment Mechanisms***

The first PBR reopener is investigating potential modifications and additions to Revenue Adjustment Mechanisms (RAM). Specifically, these include: Multi-Year Rate Plans (MRP); Earnings Sharing Mechanisms (ESM); the Revenue Decoupling Mechanism (RDM); and potential Capex / Opex Equalization Measures. As the MRP is the primary mechanism governing EDC cost recovery through base rates, it will be the main focus of this investigation. By necessity, the ESM, RDM, and Capex / Opex Equalization will also be reviewed as mechanisms related to the MRP; however, such review may or may not result in reforms during Phase 2 if none are deemed necessary to advance priority outcomes. Moreover, the Authority is reviewing, considering, and investigating the MRP, ESM, RDM, and Capex / Opex Equalization as a group of Revenue Adjustment Mechanisms in Phase 2 to account for the interrelationships and collective results of such mechanisms and proposed modifications.

The discovery, analysis, and deliberation of the RAM reopener will culminate in a final Decision to adopt guidance for subsequent EDC rate cases.

Below is a summary of the procedural events that occurred in 2024 and the upcoming events and opportunities for participation in 2025.

**Table 4: Dkt. No. 21-05-15RE01 2024 Procedural Events**

Date	Event	Primary Topic(s) of Discussion
1/10/2024	Technical Meeting #5	<ul style="list-style-type: none"> <li>• S-factor</li> <li>• Efficiency Carryover Mechanism</li> <li>• Personnel-related costs in base distribution rates</li> </ul>

Date	Event	Primary Topic(s) of Discussion
2/14/2024	Technical Meeting #6	<ul style="list-style-type: none"> <li>Earnings Sharing Mechanism (ESM) Tiers</li> <li>Revenue Decoupling Mechanism (RDM)</li> <li>Revenue Category Exception - 120+ Hours Service Outage</li> <li>Regulatory Asset Treatment</li> </ul>
3/20/2024	Technical Meeting #7	<ul style="list-style-type: none"> <li>Going-in Rates</li> <li>Financial Analysis Methodologies</li> <li>EDC presentations on Straw Proposal Concepts</li> </ul>
6/7/2024	Technical Meeting #8 (Roundtable)	<ul style="list-style-type: none"> <li>I - X Formula Design</li> <li>Potential MRP offramps</li> <li>Capital funding under the I - X Formula or other capital funding mechanism alternatives</li> <li>Relevant topics to the RAM design discussed in the Straw Proposal</li> </ul>
8/12/2024	Technical Meeting #9 (Roundtable)	<ul style="list-style-type: none"> <li>Going-in Rates</li> <li>Revenue cap formula, excluding the z-factor</li> </ul>
9/13/2024	Technical Meeting #10 (Roundtable)	<ul style="list-style-type: none"> <li>Considerations regarding incremental capital funding in an MRP</li> </ul>
10/24/2024	Technical Meeting #11 (Roundtable)	<ul style="list-style-type: none"> <li>Considerations regarding a Z-Factor</li> <li>Operational growth</li> <li>Management audits in an MRP</li> </ul>
11/18/2024	Technical Meeting #12 (Roundtable)	<ul style="list-style-type: none"> <li>Considerations regarding a Total Factor Productivity Study for an X-Factor</li> <li>Benchmarking Study for an S-Factor</li> </ul>
12/09/2024	Technical Meeting #13 (Roundtable)	<ul style="list-style-type: none"> <li>Return on equity (ROE) calculation used in a PBR rate case</li> <li>Relationship of PIMS to the ROE calculation</li> </ul>
3/31/2025	Technical Meeting #14 (Roundtable)	<ul style="list-style-type: none"> <li>TBA</li> </ul>
4/7/2025	Technical Meeting #15 (Roundtable)	<ul style="list-style-type: none"> <li>TBA</li> </ul>

### ***Docket No. 21-05-15RE02: Performance Mechanisms***

The second PBR reopener is investigating potential modifications and additions to Performance Mechanisms. These include: Reported Metrics; Scorecards; and Performance Incentive Mechanisms (PIMs). These elements of the state's regulatory structure provide transparency of information with respect to EDC performance and will help measure achievement of the regulatory goals and priority outcomes adopted in the PBR dockets. The Authority intends to review this group of performance mechanisms as a portfolio to account for the interrelationships and collective results of such mechanisms and proposed modifications. The relationship between an EDC's revenues and profits and its performance and financial incentives requires that the substance of Docket Nos. 21-05-15RE01 and 21-05-15RE02 be developed with mutual consideration of each.

The discovery, analysis, and deliberation of the Performance Mechanisms reopener will culminate in a final Decision to align existing reported metrics within the PBR Framework and elsewhere and adopt new metrics effective immediately where necessary. Additionally, this reopener docket's final Decision will establish scorecards to be implemented as soon as practicable and PIMs likely to be implemented in the subsequent EDC rate cases. The final Decision in Docket No. 21-05-15RE02 will include the requisite detail for implementation, including but not limited to, metric and scorecard reporting frequency, the format and venue for reporting, targets and benchmarks in the case of scorecards, and impact on return on equity in the case of PIMs.

Below is a summary of the procedural events that have occurred to date, and the upcoming events and opportunities for participation.

**Table 5: Dkt. No. 21-05-15RE02 2024 Procedural Events**

Date	Event	Primary Topic(s) of Discussion
6/10/2024	Technical Meeting #5 (Roundtable)	<ul style="list-style-type: none"> <li>-Performance Incentive Mechanisms (PIMs)</li> <li>Metrics, scorecards, and any specific attributes of PIMs</li> </ul>
8/26/2024	Technical Meeting #6 (Roundtable)	<ul style="list-style-type: none"> <li>Continued discussion of modifications to PIMs and impacts on priority outcomes</li> </ul>
9/26/2024	Technical Meeting #7 (Roundtable)	<ul style="list-style-type: none"> <li>Scorecards for Quality Customer Service, Affordable Service, and Resilient Electric Service</li> </ul>

Date	Event	Primary Topic(s) of Discussion
10/31/2024	Technical Meeting #8 (Roundtable)	<ul style="list-style-type: none"> <li>• Priority Outcomes that include Reported Metrics</li> </ul>
11/25/2024	Technical Meeting #9 (Roundtable)	<ul style="list-style-type: none"> <li>• -PIM proposed objectives, structure, target-setting methodology, and incentive structure</li> <li>• Priority Outcomes that include Reported Metrics</li> </ul>
12/16/2024	Technical Meeting #10 (Roundtable)	<ul style="list-style-type: none"> <li>• Cancelled</li> </ul>
4/02/2025	Technical Meeting #11 (Roundtable)	<ul style="list-style-type: none"> <li>• TBA</li> </ul>
4/09/2025	Technical Meeting #12 (Roundtable)	<ul style="list-style-type: none"> <li>• TBA</li> </ul>

### ***Docket No. 21-05-15RE03: Integrated Distribution Planning***

The third and final PBR reopener is investigating the establishment of an Integrated Distribution System Plan (IDSP). Such planning among EDCs is a growing industry standard to anticipate and optimize the proliferation of DERs and grid-edge technologies on the distribution system. This investigation is expected to encompass three key areas: (1) EDC systems and processes that support IDSP, including but not limited to internal planning, operations, and Information Technology systems; (2) operations and optimization of the grid; and (3) IDSP structure and process.

Given the interrelationship between these topic areas and various other dockets, the Authority intends to take a holistic approach that considers elements of IDSP currently in effect in Connecticut. Various elements of IDSP currently exist in Connecticut, for example, EDC hosting capacity maps and the Non-wires Solutions (NWS) Process recently established in Docket No. 17-12-03RE07, PURA Investigation into Distribution System Planning of the Electric Distribution Companies – Non-Wires Alternatives, (see Section 7 for more information on the NWS Process). Additionally, the EDCs already conduct some version of load forecasting and assess grid needs to inform capital investments – both of which are core practices of IDSP.

As a result, this proceeding is focused on documenting the existing components of IDSP, reviewing and evaluating the systems and processes that support IDSP, making components of IDSP more transparent and better connected where necessary, and establishing a public and transparent IDSP process and reporting standard(s).

Furthermore, the final Decision adopted in Docket No. 21-05-15RE03 will replace the IDSP requirements in the EMG Decision. Though this articulated endpoint may evolve over the course of the proceeding, any material changes will be communicated publicly through Docket No. 21-05-15RE03.

Below is a summary of the procedural events that have occurred to date, and the upcoming events and opportunities for participation.

**Table 6: Dkt. No. 21-05-15RE03 2024 Procedural Events**

Date	Event	Primary Topic(s) of Discussion
1/11/2024	Technical Meeting #3	<ul style="list-style-type: none"> <li>Load and Distributed Energy Resource (DER) forecast and modeling</li> </ul>
2/06/2024	Technical Meeting #4	<ul style="list-style-type: none"> <li>Grid needs assessment and distribution system analysis steps currently used in distribution planning.</li> </ul>
3/06/2024	Technical Meeting #5	<ul style="list-style-type: none"> <li>Information technology systems that support the EDCs' distribution planning processes.</li> </ul>
4/02/2024	Technical Meeting #6	<ul style="list-style-type: none"> <li>Cancelled</li> </ul>
5/14/2024	Technical Meeting #7	<ul style="list-style-type: none"> <li>Review of how the EDCs evaluate the efficacy of their distribution planning processes</li> <li>How distribution system planning processes carry-forward information and insights into future planning cycles.</li> </ul>
6/11/2024	Technical Meeting #8	<ul style="list-style-type: none"> <li>How the EDCs identify, evaluate, and choose solutions to address grid needs within existing distribution system planning processes</li> <li>Cost recovery for Non-Wires Solutions (NWS ) projects</li> </ul>
11/19/2024	Technical Meeting #9	<ul style="list-style-type: none"> <li>Rescheduled</li> </ul>
12/17/2024	Technical Meeting #10	<ul style="list-style-type: none"> <li>Discuss existing components of IDSP in Connecticut as contained in the Concept Paper</li> <li>Identify opportunities for integration with other PBR and EMG dockets</li> </ul>

Date	Event	Primary Topic(s) of Discussion
		<ul style="list-style-type: none"><li>• Discuss a public and transparent IDSP documents, development process, and reporting standards.</li></ul>
5/13/2025	Technical Meeting #11	<ul style="list-style-type: none"><li>• TBA</li></ul>
5/21/2025	Technical Meeting #12	<ul style="list-style-type: none"><li>• TBA</li></ul>



## SECTION 3: THE ELECTRIC SECTOR

1.5 M Customers

The Electric Sector is the largest industry regulated by PURA with over \$2.5 billion annually in distribution revenue under PURA's jurisdiction. The Authority is responsible for regulating the rates, services, and distribution infrastructure of Connecticut's two investor-owned electric distribution companies (EDCs), The Connecticut Light and Power Company d/b/a Eversource Energy (Eversource) and The United Illuminating Company (UI), in a manner that leads to just and reasonable rates. Together, Eversource and UI serve over 1.5 million customers (also called "ratepayers"), which represents over 90% of the state's electric customers.

The Authority's oversight of the EDCs, which is outlined in Title 16 of the General Statutes, covers a broad range of topics, including but not limited to:

- Electric distribution rates and other bill charges;
- The provision of safe, adequate, and reliable service;
- The wholesale procurement of electricity;
- The administration of renewable power contracts;
- Emergency performance and incident response procedures;
- The administration of utility poles;
- Vegetation management practices (i.e., tree trimming);
- Metering and billing accuracy;
- Customer service, education, and outreach; and
- The oversight of renewable energy tariff structures.

In addition to its regulation of the EDCs, the Authority also has purview over other aspects of electric sector regulation, including but not limited to:

- Third party electric supplier licensing;
- Registration of electric aggregators;[1] and
- Monitoring compliance with the renewable portfolio standards.

When a docket concerning any of the above topics is brought



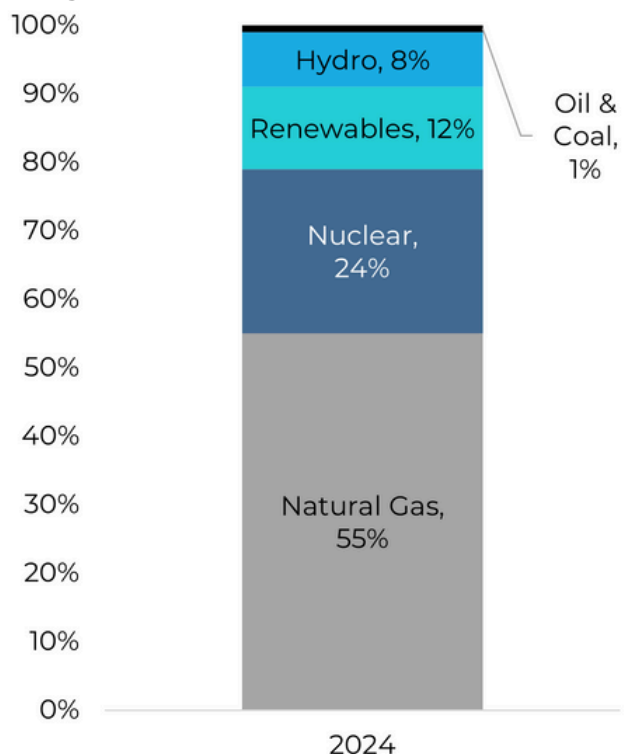
before the Authority, staff must follow the docket process to build a record of evidence that enables a well-founded decision that supports the agency's overall mission of just and reasonable rates. A detailed explanation of this process is included in Appendix 1 – Standard Docket Procedure Guide, attached to this report.

## Electric Supply Costs

While many components of the Electric Sector are under PURA's jurisdiction, PURA does not regulate wholesale energy costs. When Connecticut deregulated its energy supply in 1998, the intent was to let market competition reduce both supply costs and risk to ratepayers, while PURA would oversee the safe, reliable, and affordable distribution of electricity throughout the state.[2] Thus, the cost of electricity supply is now dictated by the regional wholesale energy markets overseen by the Independent System Operator of New England (ISO-NE or ISO New England). Although ratepayers are authorized to shop for an alternate supplier, most ratepayers elect to remain on standard default service, whereby Eversource and UI purchase electricity through the wholesale energy markets and pass that cost directly through to ratepayers. The EDCs do not earn a return on the cost of electricity.

After nearly two years of sustained, high wholesale electricity prices resulting from ongoing global conflict, high demand, and transmission constraints, on July 1, 2024, ratepayers received some relief in the form of a 29% to 39% decrease in the generation (i.e., “energy supply”) portion of their bills in the UI and Eversource territories, respectively.[3] These prices are highly correlated with the price of natural gas because it is the “marginal resource”, or the resource that sets the price in the wholesale energy markets in most hours. This means that electricity overall in New England became more expensive in early 2023 when natural gas prices rose.[4] As shown by Figure 6, natural gas powers approximately 55% of New England's electricity generation. With ongoing global conflicts, high demand, and natural gas transmission constraints, the price for electricity generated by natural gas plants has increased dramatically.

**Figure 6: 2024 New England Regional Generation Mix**



Source: [ISO New England](#)

Connecticut, and many other states in New England, have committed to decarbonizing their electric sectors and reducing their reliance on natural gas for



electricity generation.[5] ISO New England has reported that as of January 2024, it currently has nearly 40,000MW of new generating capacity proposals in its interconnection queue, the majority of which is wind.[6] Over time, as the region shifts to renewable resources powered by low- or zero-cost energy inputs, wholesale electric supply costs should decline.

Regardless, the Authority recognizes that in a state with already high utility rates, more needs to be done to enhance energy affordability in Connecticut. Though the Authority unfortunately has no control over the price of wholesale electric supply, it has designed and implemented multiple affordability and bill repayment programs, and renewable energy tariffs that empower a ratepayer's decision to install, lease, or subscribe to solar facilities in the state to gain some control over their electric supply costs. Additionally, PURA has other tools to address distribution charges on customers' bills in the long term, including rate cases and performance-based regulation, as discussed in Sections 1 and 2 above.

## KEY ELECTRIC SECTOR TOPICS IN 2024

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As discussed throughout, PURA's regulation of the EDCs primarily focuses on ensuring reliability, safety, and affordability of electric distribution service. In 2024, PURA completed its annual 2024 RAM proceedings to ensure that any adjustments reflect actual prices and costs. The Authority also continued to work with key stakeholders from the utility industry and public sector through the ESF-12 Work Group to improve emergency event planning and response coordination. Finally, PURA continued to enforce the regulatory and legal guardrails around the recovery of storm costs by utilities. Further details on these key electric sector topics are below.

### **Affordability: Annual Rate Adjustment Mechanisms**

In 2007, the General Assembly enacted Public Act 07-242, An Act Concerning Electricity and Energy Efficiency, which ordered Connecticut's electric and gas utilities to decouple their distribution revenues from the volume of sales. Essentially, this means that if a utility collects revenue higher than the amount previously established through a full rate case, it is returned in the next year's rates as a credit to customers, and if there is an under-collection, then the utility can recover that shortfall through an additional charge instead. Additionally, other costs for programs such as the EDCs' arrearage forgiveness programs and several clean energy project contracts entered into by the State of Connecticut are not included in base distribution rates. While distribution rates are set through a rate case, the other costs and revenues associated with clean energy programs, arrearage management programs, etc., are reconciled and charged to customers through separate rate components that are delineated as additional line items on the delivery side of a customer's monthly bill as explained in Section 1: Rate Case vs. Rate Adjustment Mechanisms, above.

To ensure a fair and accurate accounting of all rate components charged to customers and to address any associated under- or over-collections, the Authority annually performs a full prudence review of actual revenues and approved expenses from the prior calendar year for all rates, apart from base distribution rates, charged to retail electric customers. [7] Areas of review include, but are not limited to: the collection timeline of each rate component, including transmission; customer renewable energy and grid modernization program costs (e.g., the Residential Renewable Energy Solutions program); state-led renewable energy procurements; resilience and reliability measures; and revenue decoupling. The Authority initially reviews these filings in March and April to allow for changes to be provisionally made to the reconciling components starting May 1 of each year. Subsequently, the Authority conducts a full prudence review of the underlying costs expended through the associated programs during the previous calendar year and approves the final rate adjustments associated with such prudence review; any differences between the May 1 rates and the findings of the Authority's prudence review go into effect September 1 of the current year.

In accordance with General Statutes §16-19e(a), PURA reviews these rate components to ensure that:

1. The level and structure of rates [are] sufficient, but no more than sufficient, to allow public service companies to cover their operating costs including, but not limited to, appropriate staffing levels, and capital costs, to attract needed capital and to maintain their financial integrity, and yet provide appropriate protection to the relevant public interests, both existing and foreseeable...; and
2. The level and structure of rates charged customers shall reflect prudent and efficient management of the franchise operation.

This process is known as the Annual Review of the Rate Adjustment Mechanisms, or RAM, and is conducted for both Eversource and UI.

Every year on March 1, Eversource and UI each submit their RAM filings for the previous year, detailing the Company's calculated over- or under-recoveries for the period of January 1 through December 31 of the previous calendar year. A standardized docket numbering system is used for each company's annual RAM proceeding: XX-01-03 for Eversource and XX-01-04 for UI, with the "XX" representing the last two digits of the current calendar year. The Authority typically issues an interim decision in mid-April authorizing the provisional May 1 rates and a final decision in mid-August approving the final revenues and expenses and any rate adjustments for September 1.

### ***Eversource and UI 2024 RAM Proceedings (Dkt. Nos. 24-01-03 and 24-01-04)***

On March 1, 2024, Eversource and UI submitted their RAM filings detailing each company's over- or under-recoveries of the various rate components addressed by RAM in Docket Nos. 24-01-03 and 24-01-04, respectively. Additionally, each company provided their proposed weighted-average rate adjustments associated with such over- or under-recoveries.[8] Eversource also submitted supplemental pre-filed testimony discussing

cash flow implications for the Company if its requested RAM revenue deficiency were to be recovered on a timeline different than it proposed.

The Authority issued interrogatories and held public hearings in both dockets, resulting in non-unanimous Interim Decisions issued on April 17, 2024, that approved rate adjustments for both Companies effective July 1, 2024 to April 30, 2025. These interim decisions also specified that the Authority may adjust these approved rates effective September 1, 2024, based on its subsequent review and Final Decisions in the proceedings.

When a decision comes before the panel of commissioners for approval, it is adopted following a majority vote. In these dockets, the interim decisions were adopted, but Chairman Gillett dissented, primarily on the grounds that the majority's decision would constitute rate shock for customers by requiring a recovery of under-collected revenues over the course of just 10 months rather than a period of at least 2-3 years.

On August 14, 2024, the Authority issued Final Decisions in both dockets approving rates for Eversource and UI, with adjustments to certain rate components for the period of September 1, 2024, through April 30, 2025, to account for the Company's 2023 actual revenues and expenses and resulting over- or under-collections for the RAM Components for the 12-month period ending December 31, 2023, and to incorporate certain known and measurable expenses the Company is likely to incur in calendar year 2024 related to the implementation of certain grid modernization programs.

View the Final Decisions for [Eversource's RAM Proceeding](#) and [UI's RAM Proceeding](#).

## **Reliability: Storm and Emergency Event Planning**

### ***Storm Costs (Docket No. 24-03-30)***

On March 28, 2024, the Authority established this proceeding for the purpose of receiving and reviewing evidence of the over \$634 million in costs reported by Eversource in response to 24 catastrophic storms and pre-staging events occurring between 2018 and 2021. Together, Storm Isaias and Storm Henri account for 60% of the costs presented for PURA's review. Each of the other 22 weather events has a total cost of less than \$25 million.

Importantly, Eversource is entitled to recover prudently incurred costs arising from catastrophic storms. Likewise, the Company's rates should reflect a reasonable allocation for a storm reserve to account for the frequency and intensity of such storms. These are precisely the types of findings, determinations, and policy decisions that the General Assembly has, through General Statutes § 16-19, vested the Authority with making in fully adjudicated rate amendment proceedings. Title 16 requires the Authority to review and approve any rate amendments through a rate case proceeding, during which the many issues affecting utility costs and revenues (and, ultimately, rates) can be analyzed and considered.[9] Rate cases are a clear statutory mechanism for addressing incremental

deferred storm expenses.

Although the Company cites General Statutes § 16-19 in its application, the Company has elected not to file a rate amendment application as prescribed by General Statutes § 16-19(a) and applicable regulations. This was a deliberate choice by the Company, which has been free to file a rate amendment application since early 2023 for new rates effective any time after January 1, 2024, and in fact, has not done so since 2017.

Furthermore, EDCs have a reserve account built into existing rates for storm costs. Currently, Eversource is accruing approximately \$60 million annually for storm costs, \$55 million of which is available for past storm amortization accounts with the unused portion supplementing the \$5 million allocated directly for storm reserve. The amount used for storm amortization accounts is rapidly declining; accordingly, the unused proportion of the \$55 million supplementing the storm reserve is increasing. By April 30, 2026, the Company will have accrued at least \$109 million to the storm reserve, in addition to the Company's \$99 million storm reserve as of November 2023.

As such, this proceeding remains active with the next procedural event being a hearing scheduled for mid-September 2025. The scale of these costs, combined with the factors described above, necessitates meticulous evaluation, as the impact to ratepayers could be significant.

### ***ESF-12 Emergency Response Planning***

The increase in major storms that have impacted Connecticut over the past decade, including those at the beginning of the 2010s and Tropical Storm Isaias, and the increased frequency and severity of extreme weather event in recent years, including the fires and heat waves in the Southwest U.S., Hurricane Ian in Florida, and the flash flooding events across the Eastern U.S., demonstrate the necessity of diligent and continuous emergency response planning.

Following the severe storms that hit Connecticut in 2011, the Department of Emergency Services and Public Protection's (DESPP) Division of Emergency Management and Homeland Security was directed to establish an Emergency Planning and Preparedness Initiative to prepare the state's response in advance of future events. One component of this initiative was the creation of an Energy and Utilities Work Group that would prepare an "All-Hazards Energy and Utilities Annex" to the State Response Framework that established a process to coordinate with state and local emergency operations and to restore power and utility service to critical public facilities during disasters. This Annex is often referred to as Emergency Support Function 12, or ESF-12. [10] The official ESF-12 Annex was released in August of 2013 and continues to be maintained by Work Group members. The ESF-12 Annex defines the operational processes used to coordinate energy and utility-related emergency response actions. The annex covers all utility sectors (gas, water, electric) and defines the emergency preparedness, response, and recovery actions.

PURA serves as the lead agency of the ESF-12 Work Group, which is responsible for conducting emergency preparedness activities. Emergency preparedness responsibilities include ensuring that operating procedures are in place in advance of emergencies, coordinating with utility and state and local emergency services to ensure emergency planning measures are in place, planning and participating in emergency exercises and training, identify critical facilities, and helping identify road clearing priorities.

The ESF-12 Work Group meets on a quarterly basis, or as needed, to address potential or active threats. In 2024, PURA organized ESF-12 Work Group meetings on March 15, June 18, September 26, and December 11.[11] The focus of those meetings was to continue the ongoing work to plan and address load shedding during winter energy emergencies, improve coordination among utilities for electric service restoration during outage events, and provide cybersecurity expertise to group members.

Following lessons-learned from the Tropical Storm Isaias investigation, the Authority identified that additional planning and coordination was needed between the electric sector and telecommunications and water/wastewater sectors. The Authority's investigation yielded the finding that better communication and coordination between these sectors is necessary to improve the restoration of key telecommunication and water/wastewater infrastructure. Consequently, the Authority established two subgroups to the ESF-12 Working Group, one to aid coordination between EDCs and telecommunication providers to ensure that critical telecommunication infrastructure has been identified in advance of storms. The other subgroup is designed to aid coordination between the EDCs and the water/wastewater providers to likewise ensure their critical facilities are identified prior to storms so that they can be properly prioritized for restoration during an event.

The two subgroups made notable progress in 2024, developing and sharing critical facility lists for water, wastewater, and telecommunications critical infrastructure sectors. Progress included defining critical facilities for each industry, developing lists of priority restorations, and incorporating those facilities into electric distribution company restoration planning. Ongoing work will continue to incorporate more industry providers (especially smaller water and wastewater utilities) into the coordination to ensure statewide participation.

The ESF-12 Work Group also focused on addressing the potential for rolling blackouts throughout New England in future winters. This included refining rolling load-shedding plans, incorporating low-pressure gas systems into electric outage planning, and thinking through communication protocols for such an event.

The ESF-12 Work Group will continue to focus on inter-utility coordination and winter reliability planning in 2025.

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[1] An electric aggregator is an entity that brings customers together to buy electricity in bulk in order to increase customers' buying power.

[2] Public Act 98-28, An Act Concerning Electric Restructuring.

[3] Generation Services Charge (GSC) and Bypassable Federally Mandated Congestion Charge (BFMCC) rates in Eversource territory ranged from \$0.2372/kWh-\$0.1481/kWh between January 1, 2023, and July 1, 2024. On July 1, 2024, the rate for these components was lowered to \$0.0889/kWh. In UI territory, these rates ranged between \$0.212748/kWh and \$0.169612/kWh in that same period and were lowered to \$0.119972 on July 1, 2024.

[4] Throughout New England, wholesale electric prices are set by the sum of the cost of energy, a local congestion component, and a measurement of local loss component, together constituting the Locational Marginal Price (LMP). The Day-ahead LMP is set using scheduled energy bids for each hour in the next day. Because natural gas is the largest fuel source for the region, it therefore has a significant effect on wholesale electric prices by setting the cost of energy. For more information see ISO New England's 2023 Annual Markets Report, issued May 24, 2024 available at: <https://www.iso-ne.com/static-assets/documents/100011/2023-annual-markets-report.pdf>

[5] Public Act 22-5, An Act Concerning Climate Change Mitigation.

[6] Not all resources in the queue will be built.

[7] This review is inclusive of all reconciling component rates, regardless of whether the Authority has jurisdiction over the underlying costs. For example, electric transmission is overseen by the Federal Energy Regulatory Commission; however, transmission costs are recovered from retail electric customers. Thus, the Authority has purview over the timing and manner in which the transmission costs are passed on to Eversource and UI ratepayers, but not the total amount due.

[8] Weighted-average refers to the rate increase for all customers, on a weighted-average basis. The rate increase, however, will differ for each customer class.

[9] There are limited exceptions to this rule – namely, statutory rate adjustment and rate reconciliation mechanisms. Neither of which is applicable to the Company's request.

[10] Connecticut Emergency Support Function 12 – All Hazards and Utilities Annex, August 2013, [https://portal.ct.gov/-/media/DEMHS/\\_docs/Plans-and-Publications/EHSP0061-SRF-ESF12--EnergyandUtilitiesAnnex.pdf](https://portal.ct.gov/-/media/DEMHS/_docs/Plans-and-Publications/EHSP0061-SRF-ESF12--EnergyandUtilitiesAnnex.pdf)

[11] The December 11, 2024 ESF-12 Work Group meeting was cancelled due to an active event.

## 2024 ELECTRIC SECTOR DECISIONS

Docket Number	Title	Decision Date
<a href="#">23-01-39RE01</a>	PURA Consideration of Civil Penalty and Enforcement Action Against the Connecticut Light and Power d/b/a Eversource Energy After Investigation of the Accident	1/10/2024
<a href="#">23-11-09</a>	Application for Temporary Master Meter Approval at 48 Stony Hill Rd, Bethel, CT	1/17/2024
<a href="#">23-10-33</a>	Application to Install a Single Meter for Temporary Use at 525 Main Street, Hartford, CT	1/17/2024
<a href="#">23-05-87</a>	PURA Investigation into the Fatal Accident that Occurred on May 17, 2023, at 2150 Post Road, Fairfield, CT	1/24/2024
<a href="#">23-01-32RE01</a>	PURA Consideration of Civil Penalty and Enforcement Action Against the Connecticut Light and Power d/b/a Eversource Energy After Investigation of Eversource's Manner of Operation and Safety Regarding its Underground Electric Distribution System	2/21/2024
<a href="#">22-10-05</a>	Petition of Sunnova for a Declaratory Ruling Regarding Ownership of Capacity Rights Regarding Class I Renewable Energy Sources Participating in the Resi. Renewable Energy Solutions Program	3/13/2024
<a href="#">22-10-12</a>	PURA Proceeding to Investigate Alternative Risk Transfer Programs	4/3/2024
<a href="#">24-02-14</a>	Application for Temporary Master Metering Approval at 55 Elm Street, Hartford, CT	4/17/2024
<a href="#">24-01-03</a>	PURA Annual Review of the Rate Adjustment Mechanisms of The Connecticut Light and Power Company - Interim Decision	4/17/2024



## 2024 ELECTRIC SECTOR DECISIONS

Docket Number	Title	Decision Date
<a href="#">24-01-04</a>	PURA Annual Review of the Rate Adjustment Mechanisms of The United Illuminating Company - Interim Decision	4/17/2024
<a href="#">24-02-01</a>	Annual Reconciliation of The Conservation Adjustment Mechanisms Filed by The Connecticut Light and Power Company, The United Illuminating Company, Connecticut Natural Gas Corporation, The Southern Connecticut Gas Company, And Yankee Gas Services Company	6/11/2024
<a href="#">23-12-20</a>	PURA Review and Approval of Pro Forma Tariffs Pursuant to Section 16-243a-2 of the Regulations of Connecticut State Agencies	6/11/2024
<a href="#">23-11-04</a>	Pura Implementation of The Legal Services Funding Provisions of Section 30 Of Public Act 23-102	7/10/2024
<a href="#">24-05-21</a>	Application Of the Connecticut Light and Power Company dba Eversource Energy for Approval of The Issuance Of Long-Term Debt	7/24/2024
<a href="#">24-01-03</a>	PURA Annual Review of the Rate Adjustment Mechanisms of The Connecticut Light and Power Company - Final Decision	8/14/2024
<a href="#">24-01-04</a>	PURA Annual Review of the Rate Adjustment Mechanisms of The United Illuminating Company	8/24/2024
<a href="#">24-09-21</a>	Application To Install and Use an Electric Master Metering System At 210 Long Ridge Road, Stamford, Ct	12/11/2024
<a href="#">20-08-03RE01</a>	PURA Consideration of Civil Penalty and Enforcement Action Against the Electric Distribution Companies After Storm Isaias Investigation	12/11/2024

## 2024 ELECTRIC SECTOR DECISIONS

Docket Number	Title	Decision Date
<a href="#"><u>20-08-03</u></a>	Investigation Into Electric Distribution Companies' Preparation for And Response to Tropical Storm Isaías	12/11/2024
<a href="#"><u>24-06-02</u></a>	GenConn Energy LLC Application to Establish 2025 Revenue Requirements	12/18/2024
<a href="#"><u>24-06-03</u></a>	GB II New Haven LLC Application to Establish 2025 Revenue Requirements	12/18/2024

A comprehensive list of PURA 2024 decisions is available in Appendix 2, attached to this Report.



## **SECTION 4:**

# **THE NATURAL GAS SECTOR**

### **600K CUSTOMERS**

PURA is responsible for the regulation and oversight of all in-state natural gas pipelines, both as they relate to the operation and management by the owners and operators of such pipelines and regarding public safety.[1] These owners and operators of in-state natural gas pipelines are commonly referred to as the local distribution companies (LDCs). The LDCs receive gas from interstate transmission pipelines and distribute the gas to retail customers. Pipelines, called mains, run down streets to distribute the gas throughout the area. Smaller service lines run from the mains to the individual customers.

LDCs are required to meet both Minimum Federal Safety Standards and the laws and regulations of Connecticut, which together address most areas of gas operator activities. Detailed requirements apply to the materials that may be used for constructing new gas pipelines. The requirements also address permitted pressure levels for the systems, design standards for the facilities, construction requirements, and initial testing of the facilities to ensure safety. There are extensive requirements for welding steel and other forms of joining materials. Corrosion control, operation and maintenance, emergency response, and qualification of employees to perform safety-related activities are also covered.

PURA's gas pipeline inspection program uses a combination of field inspections and reviews of company plans, procedures, and records to ensure compliance with applicable safety requirements. When a safety incident occurs, PURA staff will perform an investigation of the cause, and may levy fines or penalties depending on who or what was responsible for the incident. Any member of the public may file a complaint reporting defects or state or federal safety violations of any part of the natural gas pipeline infrastructure in the state to the Authority.

Sometimes, damage to a gas pipeline is caused by improper or unauthorized digging during construction projects. Excavation damage to underground utility facilities can cause fires and explosions, injuries, deaths, and significant disruptions to public utility service. To prevent this, PURA administers the [Call Before You Dig](#) (CBYD) program. The CBYD Program was established to protect the public safety with regard to excavations near underground facilities by

providing a communications link between excavators, public agencies, and public utilities. Excavators must call CBYD prior to digging, and then CBYD will notify all utilities that might be in the area. Utilities will then locate their pipes and cables using paint and stakes so excavators can conduct their work without causing damage to existing underground utilities. Due to the potential safety issues at risk, the Authority assesses significant civil penalties to any party who violates the applicable statutes and regulations, which are not recoverable in rates.

In 2024, PURA conducted robust inspection processes, and found and corrected multiple violations. Additionally, PURA issued multiple civil penalties designed to deter further noncompliance.

**Submit a Safety  
Complaint**

or

**Contact CBYD:**

Call 811 or 1-800-922-4455



**465**  
Pipeline  
Safety  
Inspection  
Person-days



**746**  
CBYD  
Inspections



**68**  
Total  
Violations  
Found



**\$616k**  
Civil  
Penalties  
Issued

## KEY NATURAL GAS TOPICS IN 2024

The Authority's foremost responsibility related to natural gas is ensuring the safe and affordable delivery of service throughout the state. In addition to inspections, documentation review, and civil penalties, the Authority can monitor and enforce safety compliance through the adoption of regulations and measurement of leak metrics. In 2024, PURA continued updating its regulations for the first time since the 1960's, and also

completed its annual Lost and Unaccounted for Gas Report, both supporting continued high standards of safety and affordable service in Connecticut.

## Updates to Connecticut's Gas Pipeline Safety Regulations

On July 25, 2023, the Authority initiated Docket No. 23-07-21, Regulations for Gas Pipeline Safety, to repeal, amend, and adopt new gas pipeline safety regulations for Connecticut. Before this date, the existing regulations had not been revised since the 1960's.[2] Since that time there have been significant changes in the gas industry, including the materials and equipment used and the processes for installing and maintaining gas distribution systems. Additionally, there is now increased prioritization on the enhanced public safety and reduced environmental impact of gas distribution systems.

The Authority issued draft proposed regulations on August 21, 2023, and held a public hearing on October 11, 2023, accompanied by an opportunity to submit written comments through October 20, 2023. The Authority received comments from CNG and SCG, Yankee Gas, and Norwich Public Utilities. Importantly, though PURA does not regulate the rates of municipal utilities such as Norwich Public Utilities, all state gas safety regulations apply to all gas companies in Connecticut, regardless of their ownership structure. The Authority reviewed all comments and issued final proposed regulations with appropriate revisions on January 3, 2024. Key amendments in the final proposed regulations include, for example, strengthening the qualification and training requirements for pipeline operators and codifying enhanced leakage reduction procedures, as well as leak severity level criteria as set by the October 7, 2020 Decision in PURA Docket No. 20-02-19, PURA Investigation into a Uniform Natural Gas Leak Classification.

Following a review and approval by the Attorney General's Office in April 2024, the Authority submitted the proposed regulations to the Legislative Regulation Review Committee for approval. In accordance with the legislative procedures, the Legislative Commissioners' Office issued a report on the proposed regulations which detailed substantive and technical corrections and recommendations. The Legislative Regulation Review Committee rejected the proposed regulations without prejudice. Following a thorough review of the report and after internal consideration and revision, the Authority submitted revised regulations to the Attorney General's Office on January 15, 2025.

These regulations will be considered final after review and approval by the Attorney General and the Legislative Regulation Review Committee. Upon approval by the

### Additional Gas Pipeline Safety Regulation Resources

- [PURA Updated Proposed Regulation Amendments](#)
- [eRegulations System Tracking Number: PR2023-019](#)

Attorney General and the Legislative Regulation Review Committee, these modern regulations that benefit public safety, employee safety, and the environment will take effect.

### Lost and Unaccounted for Gas Report (LAUF Gas)

The Authority is required to submit a report to the General Assembly each year reporting on LAUF gas in Connecticut. LAUF gas is an accounting concept and ratemaking tool developed to balance the receipts and deliveries of natural gas. During a 12-month period, a difference may arise between the amount of gas injected into a distribution system and the gas measured at customers' meters; this difference is accounted for using the concept of LAUF gas. The LAUF gas metric is comprised of various sources, such as measurement and accounting errors, and estimates for unbilled gas, stolen gas, and pipe leaks. Thus, LAUF gas encompasses both a physical (e.g., from leaky pipes) and a nominal component. LAUF gas must be kept to a reasonable and prudent level because uncontrolled LAUF gas can indicate that there are excessive leaks, or utility mismanagement in repairing leaks, resulting in customers paying too much for gas.

In 2024, PURA opened Docket No. 24-03-02, 2024 PURA Report to the General Assembly Concerning Lost and Unaccounted for Gas, to review the 2023 LAUF reports submitted by CNG, SCG, and Yankee Gas. If an LDC's reported LAUF gas for the previous year exceeds 3%, PURA must initiate a docket to investigate further. The Authority requires the LDCs to submit LAUF data on both a calendar year and a summer-to-summer basis because Connecticut's LDCs experience peak sales and delivery of natural gas during the winter months. Therefore, a 12-month period from summer-to-summer provides a more accurate LAUF calculation because it encompasses a full winter heating season. The associated loss of revenue attributable to LAUF gas calculated from summer-to-summer is then recovered by the LDCs through the purchased gas adjustment (PGA) mechanism. Table 7 displays the historical summer-to-summer LAUF Gas over the past five years.

**Table 7: Historical LAUF Gas During Summer-to-Summer Period**

Year	CNG	SCG	Yankee
2019	1.10%	1.84%	1.43%
2020	1.41%	1.50%	1.54%
2021	2.10%	2.85%	1.55%
2022	2.11%	2.56%	2.25%
2023	1.93%	2.13%	1.80%

Based on the data in Tables 7 and 8, the Authority found that the LAUF gas percentages for CNG and SCG in 2023 are below the 3% threshold and therefore do not require further investigation. However, while Yankee's summer-to-summer LAUF gas fell below the 3% statutory limit, its calendar year LAUF gas did not, prompting the Authority to investigate potential causes. Through this investigation, PURA found that the primary cause of LAUF gas in 2023 was due to a misalignment of two gas flow measurements: (1) the amount of gas as it enters the distribution system; and (2) the amount measured at customer meters during monthly customer billing. These measurements are taken on different cadences causing discrepancies between the measured amount of gas passing through the distribution system, and the gas measured at the meter. As such, the Authority did not find evidence suggesting the LAUF gas exceedance of the statutory limit was caused by aging infrastructure or leaks but rather was attributable to measurement timing.

**Table 8: Historical LAUF Gas during a Calendar Year Period**

Year	CNG	SCG	Yankee
2019	1.10%	1.84%	1.05%
2020	2.59%	2.77%	1.31%
2021	2.02%	1.36%	1.88%
2022	2.59%	2.84%	2.42%
2023	2.06%	2.29%	3.13%

Nonetheless, gas leak reduction continues to be a major priority for both the Authority and the LDCs. Two major threats to an LDC's system integrity are aging infrastructure and third-party damage during excavation work. At the direction of the Authority, the LDCs have implemented a variety of methods to address these threats and to reduce gas leaks. These methods include but are not limited to: replacing older leak-prone infrastructure; implementing distribution integrity management programs; and executing aggressive damage prevention programs and enforcement such as CBYD. The Authority recommends that the LDCs continue their efforts to implement the programs listed above to further reduce gas leaks.

In addition to reporting LAUF gas, the LDCs provide the number of leaks that they repaired, broken down by the cause of leak, as well as the remaining leaks on a calendar year basis. Leaks are categorized on a series of grades that reflect the hazard level. A Grade 1 Leak represents an existing or probable hazard to persons or property.[3] A Grade 2 Leak is a leak that is recognized as nonhazardous to persons or property at the time of detection, but justifies a scheduled repair based on probable future hazard.[4] A Grade 3 Leak is a leak that is recognized as nonhazardous to persons or property at the time of



detection and can be reasonably expected to remain nonhazardous. All Grade 1 leaks must be repaired immediately; however, Grade 2 leaks are not always repaired immediately, but are still considered important. The Authority limits the number of Grade 2 leak backlogs at the end of each calendar year. Grade 3 leaks have traditionally been eliminated through the replacement of older, leak-prone pipe.

**Table 9: Number of Grade 1 Leaks Eliminated or Repaired; by Cause**

Cause	2019			2020			2021			2022			2023		
	YGS	CNG	SCG	YGS	CNG	SCG	YGS	CNG	SCG	YGS	CNG	SCG	YGS	CNG	SCG
<b>Corrosion</b>	108	71	234	97	56	108	84	57	147	85	50	207	78	39	150
<b>Natural Forces</b>	29	12	47	41	12	45	77	13	71	53	21	53	18	17	27
<b>Excavation Damage</b>	73	69	101	98	83	110	96	77	109	89	82	107	90	82	84
<b>Other Outside Force Damage</b>	0	0	4	3	0	2	7	0	2	24	0	5	25	8	2
<b>Material or Welds</b>	25	0	1	49	0	0	52	1	20	16	1	23	27	3	25
<b>Equipment</b>	41	82	138	27	60	21	37	80	46	86	49	51	45	23	37
<b>Incorrect Operation</b>	2	0	0	8	0	0	14	0	0	26	0	0	4	2	0
<b>Other</b>	49	17	0	52	16	0	25	7	2	5	11	1	14	8	6

[Read the 2024 LAUF Gas Report.](#)

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[1] See Conn. Gen. Stat. § 16-272.

[2] See Conn. Agencies Regs. §§ 16-11-22, 16-11-31, 16-11-41, and 16-16-2.

[3] A Grade 1 Leak is present if any of the eight conditions listed in Appendix A of the Leak Classification Decision occurs.

[4] A Grade 2 Leak is present if any of the six conditions listed in Appendix A of the Leak Classification Decision occurs.

## 2024 NATURAL GAS SECTOR DECISIONS

Docket Number	Title	Decision Date
<a href="#">23-10-01</a>	PURA Annual Review of the Purchased Gas Adjustment Clause Charges or Credits Filed by Connecticut Local Distribution Companies	5/15/2024
<a href="#">23-11-02 (SCG)</a> <a href="#">23-11-02 (CNG)</a>	Application of Connecticut Natural Gas Corporation and The Southern Connecticut Gas Company to Amend Their Rate Schedules	11/18/2024
<a href="#">24-03-01</a>	Annual Review Of The System Expansion Reconciliation Mechanisms	12/18/2024
<a href="#">24-09-01</a>	Call Before You Dig, Inc. - Proposed Budget for 2025	12/18/2024

A comprehensive list of PURA 2024 decisions is available in Appendix 2, attached to this Report.



# SECTION 5: THE WATER SECTOR

## 1.1 M CUSTOMERS

Connecticut's water is an essential natural resource that must be carefully maintained and distributed in order to ensure long-term, safe, available, and affordable water service. Within the state boundaries are over 6,000 miles of rivers and streams, at least 2,000 lakes and reservoirs, and groundwater resources that supply Connecticut residents with water.[1] These public water systems and resources are jointly regulated by PURA, DEEP, and the Department of Public Health (DPH). DEEP is responsible for administering the Aquifer Protection Area Program, establishing land use regulations and standards, and monitoring, assessing, and reporting water quality. DPH oversees the safe and adequate supply of drinking water for Connecticut's population by regulating the purity of all public water systems, while PURA regulates the costs, rates, infrastructure, conservation mechanisms, and business operations of Connecticut's investor-owned water utilities.

Together, PURA, DEEP, and DPH coordinate their roles in protecting Connecticut's water resources through their membership on the Connecticut Water Planning Council (WPC), which was chaired by PURA Vice Chairman Jack Betkoski until his retirement on January 1, 2025.[2] The WPC was founded in 2001 through Public Act 01-177, An Act Establishing a Water Planning Council, with the purpose of "address[ing] issues involving the water companies, water resources, and state policies regarding the future of the state's drinking water supply." The WPC jointly prepared the State Water Plan in 2018 with a goal of balancing public water supply needs, economic development, recreation, and ecological health. The WPC is now used to guide Connecticut's water strategy, policies, and actions.

# KEY WATER SECTOR TOPICS IN 2024

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## Water Conservation

Despite typically receiving plentiful precipitation, Connecticut is not exempt from experiencing drought conditions. Following a State of Emergency Declaration in October 2024<sup>[3]</sup> due to critical fire weather conditions, Governor Lamont declared Stage 2 Drought conditions in all eight Connecticut counties due to a combination of precipitation shortfalls and ongoing fire danger levels statewide in November 2024.<sup>[4]</sup> Distinct from the other four stages of drought conditions, Stage 2 is used to identify an emerging drought event and warns citizens about potential impacts to water supplies. In a State 2 Drought, residents and businesses are asked to voluntarily take measures to conserve water.

In addition to participating on the WPC, PURA also participates in the Interagency Drought Workgroup (IDW), which is a subcommittee of the WPC. The IDW is responsible for developing and administering the Connecticut Drought Preparedness and Response Plan (Drought Plan). The WPC adopted the IDW's updated Drought Plan on September 6, 2022. The Drought Plan provides guidance and recommendations for a coordinated approach to drought response and determines the level of concern warranted for a drought event.<sup>[5]</sup> Additionally, the Drought Plan identifies the powers provided by existing statutes and regulations that can be called upon by Connecticut's state agencies to manage water shortages and societal hazards caused by droughts.

## Water Infrastructure Conservation Adjustments

Among its responsibilities in regulating the water companies, PURA is charged with ensuring utility rate designs encourage conservation and responsible water use, particularly through a regulatory tool called the Water Infrastructure Conservation Adjustment (WICA) surcharge adjustment mechanism. The WICA process enables the Authority, in consultation with the Office of Consumer Counsel (OCC), to administer a rate adjustment mechanism for the purpose of funding eligible water infrastructure improvement projects completed by PURA-regulated water companies between rate cases. Under the WICA program, ratepayers pay the rate-case-approved rates, plus an additional WICA surcharge to recover the costs of approved improvements. This enables water companies to accelerate the replacement and/or rehabilitation of aging water system infrastructure and promotes conservation measures. Pursuant to General Statutes § 16-262w(i), the amount of WICA charged between general rate case filings cannot exceed ten percent (10%) of the water company's approved annual revenue requirement. When companies propose new WICA projects, the Authority analyzes the proposals against the following criteria:

- It is eligible for WICA Program treatment under General Statutes § 16-262v(1). Specifically, the project is eligible if it:

- Improves or protects the quality and reliability of service to customers including (A) renewal or replacement of existing infrastructure ... [that has] either reached the end of its useful life, are worn out, are in deteriorated condition, are or will be contributing to unacceptable levels of unaccounted for water, or are negatively impacting water quality or reliability of service if not replaced; (B) covers main cleaning and relining projects; (C) relocation of facilities as a result of government actions, the capital costs of which are not otherwise eligible for reimbursement; [and] (D) purchase of leak detection equipment or installation of production meters, and pressure reducing valves;
- Benefits customers by improving water quality, system integrity, or service reliability;
- Adheres to the criteria established for determining priority of infrastructure projects; and
- There is a sufficient level of investment in infrastructure.

In 2024, PURA issued ten WICA decisions or Semi-Annual Filing Reports (SAFR) decisions filed by water companies in Connecticut. These decisions authorize one or more of the following: new projects as WICA-eligible; modifications to projects previously identified as WICA-eligible; and an increase in the WICA surcharge (up to 10% of the approved revenue requirement in total) to recover costs associated with completed WICA projects. The Authority also reconciles any under- or -over-collection of the previously-authorized WICA surcharge, resulting in either an additional surcharge to customers in the event of an under-collection and a credit to customers in the event of an over-collection. A summary of these decisions is in Table 10 below followed by additional details. If a cell is blank, it means it may not have been pertinent to that decision:

**Table 10: 2023 WICA Decisions by Company**

Company	Docket Number	Decision Date	Cumulative Completed WICA Investments	Current Surcharge	Reconciliation Surcharge or Surcredit
Connecticut Water Company	20-12-30WI07	4/17/2024	0%	0%	
	20-12-30WI08	3/27/2024			(0.13%)
	23-08-32WI01	9/18/2024	3.43%	3.43%	
Aquarion Water Company	22-07-01WI01	9/25/2024	2.50%	2.50%	
	13-02-20WI25	3/27/2024			0.17%
	13-02-20WI26	7/10/2024	0%	0%	
	13-02-20WI27	12/18/2024	0%	0%	

Company	Docket Number	Decision Date	Cumulative Completed WICA Investments	Current Surcharge	Reconciliation Surcharge or Surcredit
Jewett City Water Company	20-10-31WI02	3/27/2024			0.16%
Hazardville Water Company	12-07-07WI20	3/27/2024			0.99%
Torrington Water Company	10-05-01WI27	3/27/2024			1.10%

- Docket No. 20-12-30WI07 – Connecticut Water Company requested approval of new projects. There is no surcharge because the Company did not submit completed projects.
- Docket No. 20-12-30WI08 – This is an annual reconciliation. The Company charged \$135,700 more than was allowed; therefore it must return the money via a surcredit. The surcredit is -0.13% and it is effective from April 1, 2024, through March 31, 2025.
- Docket No. 23-08-32WI01 – CWC requested a surcharge of 3.43%, which is equal to \$41,859,677 for 30 completed projects.
- Docket No. 22-07-01WI01 – Aquarion requested a 2.5% surcharge for 71 completed projects for a total of \$44,249,063.
- Docket No. 13-02-20WI25 – This is an annual reconciliation. Aquarion under-collected \$294,018, which is equal to 0.17%. This amount is charged on customers' bills from April 1, 2024, to March 31, 2025.
- Docket No. 13-02-20WI26 – Aquarion requested approval of new projects for its legacy systems. No surcharge requested.
- Docket No. 13-02-20WI27 – Aquarion requested approval of new projects for WICA procedures for its Valley Water System located Plainville. No surcharge requested. Aquarion acquired Valley Water System in 2021.
- Docket No. 20-10-31WI02 – This is an annual reconciliation. The Company under-collected \$3,392 and is charging customers 0.16% from April 1, 2024, to March 31, 2025.
- Docket No. 12-07-07WI20 – This is an annual reconciliation. The Company under-collected \$37,148 and is charging customers 0.99% from April 1, 2024, to March 31, 2025.
- Docket No. 10-05-01WI27 – This is an annual reconciliation. The Company under-collected \$79,930 and is charging customers 1.10% from April 1, 2024, to March 31, 2025.



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[1] DEEP, Connecticut's Water Resources, <https://portal.ct.gov/DEEP/Water/Connecticuts-Water-Resources>

[2] The WPC is now chaired by the Office of Policy & Management (OPM) Undersecretary, Martin L. Heft. PURA Commissioner David Arconti represents PURA on the WPC.

[3] Press Release, October 25, 2024, "Governor Lamont Declares State of Emergency Due to Critical Fire Weather Conditions Statewide." [https://portal.ct.gov/governor/news/press-releases/2024/10-2024/governor-lamont-declares-state-of-emergency-due-to-critical-fire-weather-conditions-statewide?language=en\\_US](https://portal.ct.gov/governor/news/press-releases/2024/10-2024/governor-lamont-declares-state-of-emergency-due-to-critical-fire-weather-conditions-statewide?language=en_US)

[4] Press Release, November 9, 2024, "Governor Lamont Declares Stage 2 Drought Advisory for All of Connecticut." [https://portal.ct.gov/governor/news/press-releases/2024/11-2024/governor-lamont-declares-stage-2-drought-advisory-for-all-of-connecticut?fbclid=PAZXh0bgNhZW0CMTEAAabFfufeXGNexeiTyYaB--NlMnLq9ZMwG1MJ1a9VbDaGpcHQrXKYKR1pO8M\\_aem\\_UdV0ftU3Co1t\\_znY92UxYQ&language=en\\_US](https://portal.ct.gov/governor/news/press-releases/2024/11-2024/governor-lamont-declares-stage-2-drought-advisory-for-all-of-connecticut?fbclid=PAZXh0bgNhZW0CMTEAAabFfufeXGNexeiTyYaB--NlMnLq9ZMwG1MJ1a9VbDaGpcHQrXKYKR1pO8M_aem_UdV0ftU3Co1t_znY92UxYQ&language=en_US)

[5] Connecticut State Drought Preparedness & Response Plan, September 6, 2022, available at: [https://portal.ct.gov/-/media/water/drought/ct\\_state\\_drought\\_plan\\_2022-09-06.pdf?rev=153e7a15a1284a93ba5d816fa8831809&hash=440F78B17F2E196389B7D09FF791D7E2](https://portal.ct.gov/-/media/water/drought/ct_state_drought_plan_2022-09-06.pdf?rev=153e7a15a1284a93ba5d816fa8831809&hash=440F78B17F2E196389B7D09FF791D7E2)

## 2024 WATER SECTOR DECISIONS

Docket Number	Title	Decision Date
<a href="#">23-11-16</a>	Application of The Connecticut Water Company for Approval of the Issuance of up to \$25,000,000 of Unsecured Notes	1/10/2024
<a href="#">23-08-16</a>	Application of the Connecticut Water Company to Dispose of Approximately 16.1 Acres of Real Property Located South of Mulberry Reservoir in the Borough of Naugatuck, Connecticut	1/10/2024
<a href="#">23-10-32</a>	Application of EarthGrid PBC Corporation to Provide Resold and Facilities-based Local Exchange and Intrastate Toll Services	2/14/2024
<a href="#">20-10-31WI02</a>	Jewett City Water application for approval of Annual WICA Reconciliation	3/27/2024
<a href="#">20-12-30WI08</a>	Application of The Connecticut Water Company for its Annual Reconciliation of its Water Infrastructure and Conservation Adjustment	3/27/2024
<a href="#">13-02-20WI25</a>	Aquarion Water Company Annual WICA Surcharge Reconciliation	3/27/2024
<a href="#">12-07-07WI20</a>	Application of Hazardville Water Company for Annual WICA Reconciliation	3/27/2024
<a href="#">10-05-01WI27</a>	Application of Torrington Water Company for its Annual Reconciliation of its Water Infrastructure and Conservation Adjustment	3/27/2024
<a href="#">24-02-15</a>	Application of Aquarion Water Company of Connecticut for Approval of the Issuance of Long-Term Debt in the Principal Amount of up to \$118,516,577.	4/3/2024

## 2024 WATER SECTOR DECISIONS

Docket Number	Title	Decision Date
<a href="#">20-12-30WI07</a>	Application of The Connecticut Water Company for a Water Infrastructure Conservation Adjustment	4/17/2024
<a href="#">23-11-24</a>	Application of the Connecticut Water Company to Dispose of Approximately 0.2+ Acres of Real Property Located at 14 West Main Street in the Town of Avon, Connecticut	5/8/2024
<a href="#">23-08-32</a>	Application of Connecticut Water Company to Amend its Rate Schedules	6/28/2024
<a href="#">24-05-19</a>	Application of Zayo Northeast, LLC for a Certificate of Public Convenience and Necessity	7/10/2024
<a href="#">24-02-15</a>	Application of Aquarion Water Company of Connecticut for Approval of the Issuance of Long-Term Debt in the Principal Amount of up to \$118,516,577.	7/10/2024
<a href="#">13-02-20WI26</a>	Application of Aquarion Water Company of Connecticut for Approval of Water Infrastructure and Conservation Adjustment Projects	7/10/2024
<a href="#">24-06-07</a>	Application of Zayo Infrastructure Holdco, LLC for a Certificate of Public Convenience and Necessity	7/31/2024
<a href="#">22-07-01RE01</a>	APPLICATION OF AQUARION WATER COMPANY OF CONNECTICUT TO AMEND ITS RATE SCHEDULE - REMAND	7/31/2024
<a href="#">24-06-20</a>	Application of The Connecticut Water Company for Approval of the Issuance of up to \$150,000,000 of Unsecured Notes	8/14/2024

## 2024 WATER SECTOR DECISIONS

Docket Number	Title	Decision Date
<a href="#">21-04-25</a>	Application of Electric Lightwave, LLC d/b/a Allstream for a Telcom Certificate of Public Convenience and Necessity	8/28/2024
<a href="#">23-08-32WI01</a>	Application of The Connecticut Water Company for a Water Infrastructure Conservation Adjustment Semi Annual Filing Report	9/18/2024
<a href="#">24-07-07</a>	Lattizori Development, LLC - Request for Approval of Special Deposit Contract	9/18/2024
<a href="#">22-07-01WI01</a>	Application of Aquarion Water Company of Connecticut for a Water Infrastructure and Conservation Adjustment	9/25/2024
<a href="#">13-02-20WI27</a>	Application of Aquarion Water Company of Connecticut for Approval of Water Infrastructure and Conservation Adjustment Projects	12/18/2024

A comprehensive list of PURA 2024 decisions is available in Appendix 2, attached to this Report.



## SECTION 6: THE TELECOMM. & UTILITY POLE SECTOR

### 4.7M COMMUNICATIONS LINES

Since the mid-1990s, both wireless and wireline telecommunications in Connecticut have been largely deregulated under state and federal law. Most telecommunications services, including cellular service, local and long-distance calling, “800” services, and voice over internet protocol (VOIP), are not subject to rate or quality regulations.

Connecticut customers can obtain telecommunication services from The Southern New England Telephone Company (Frontier Communications of Connecticut), which is the primary incumbent local exchange carrier, or from any number of Competitive Local Exchange Carriers (CLECs), or even from cable companies.

PURA continues to provide regulatory oversight of what is referred to as Plain Old Telephone Service (POTS), which is the traditional, analog voice transmission over copper wires. This service, however, has been largely replaced as customers have migrated towards more sophisticated competitive services.

PURA also plays an important role in promoting a competitive telecommunications market through its regulation of public rights-of-way and utility poles, which support a substantial portion of the state’s telecommunications infrastructure. With rapid advances in communications technology, PURA endeavors to maintain a regulatory scheme that facilitates equitable and timely access to these critical assets. Further, the CBYD program, discussed in Section 4: The Natural Gas Sector and overseen by the Authority, ensures that excavations related to underground telecommunications facilities are done safely and in coordination with other relevant utilities.

Finally, PURA is also responsible for determining and approving funding for public and community technology and telecommunications resources such as Connecticut’s

Enhanced Emergency 911 (E-911) program and community access television. These services are critical elements of Connecticut's infrastructure, providing education, and emergency support, and enhancing First Amendment rights for Connecticut's citizens.

## KEY TELECOMM & UTILITY POLE TOPICS IN 2024

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### Enabling Broadband

In 2021, Public Act 21-159, An Act Concerning Equitable Access to Broadband, directed the state to begin promoting the build out of highspeed broadband internet service, particularly in underserved communities, such as rural communities, urban centers, or low-income areas. This Act also specifically directed PURA to develop a process and set of requirements for broadband providers that want to deploy certain underground telecommunications infrastructure in the public rights-of-way. Such requirements include:

1. The size of such conduit shall be consistent with industry best practices and sufficient to accommodate potential demand;
2. Any handholes and manholes for fiber optic cable access and pulling with respect to each such practice shall be placed at intervals consistent with industry best practices;
3. Such conduit shall be installed with a pull tape and capabilities of supporting additional fiber optic cable;
4. The applicant shall notify telecommunications service providers and broadband Internet access service providers of the proposed excavation to reduce the potential for future street excavations in the same location;
5. Any requesting telecommunications service provider or broadband Internet access service provider shall be able to access such conduit on a competitively neutral and nondiscriminatory basis and for a charge not to exceed a cost-based rate;
6. The applicant shall report to the Authority upon completion of any approved construction verifying that it has complied with the provisions of this subsection; and
7. Any other condition deemed prudent and reasonable by the Authority.

On January 14, 2022, PURA issued a notice of proceeding in Docket No. 21-12-21, PURA Implementation of Process and Procedures for Conduit Excavations for Telecommunications Service Providers and Broadband Internet Access Service Providers, pursuant to the requirements of Public Act 21-159. On February 8, 2023, PURA issued a Decision establishing a formal application and approval process for the coordination of construction of conduit excavations in the public rights-of-way by telecommunications and broadband providers. This process, as was intended by Public Act 21-159, will ensure that underground telecommunications and broadband facilities are deployed with

efficiency and care, both minimizing deployment costs and disturbances in the public right-of-way (i.e., fewer instances of streets and sidewalks being dug up). Additionally, this application process will help ensure a competitively neutral and nondiscriminatory process that promotes timely construction of underground excavation while reducing the potential for future excavations.

Specific components that help to achieve these outcomes include a five-year moratorium on underground excavations on certain CTDOT-noticed construction and maintenance projects to ensure the viability of new construction, and a notification deadline to ensure that all broadband providers have the opportunity to review proposed excavations so as to minimize future excavations.

This process formally took effect as of the date of the Final Decision. Applications submitted in compliance with this process have been filed in Docket No. 23-02-03, Application of Conduit Excavation and Notification Process for Telecommunications Service Providers and Broadband Internet Access Service Providers, since that date. In 2024, PURA reviewed and approved 351 applications for conduit excavations statewide, helping to support the deployment of broadband infrastructure.

#### **Additional Conduit Excavation Resources**

- [Final Decision](#)
- [Conduit Excavations Applications](#)

## **Utility Pole Safety**

Utility poles support many services required by modern society including broadband attachments, telephone service, and electric distribution wires. Their common placement throughout communities helps to make these services accessible for millions of residents and businesses. However, given utility poles' proximity to where people live and work, structurally compromised poles can present a significant risk to public safety. Proper and regular maintenance procedures are therefore essential to ensuring safety for all.

An ongoing issue related to poles in Connecticut are the existence of "double poles" that result from inefficient pole maintenance and replacement. The term "double poles" refers to instances when a replacement pole is installed next to an existing pole, but the existing pole removal is not completed. Not only are double poles an aesthetic issue, but they can present public safety hazards. The most common cause of this condition is that all the attachments on the existing pole have not been transferred, which can be hindered by the fact that they must be transferred to the new pole sequentially before the original pole can be removed. If all the attachments are not transferred in a timely manner, the new and old pole may exist together for an extended period of time.

Previous requirements placed the responsibility of transferring a pole attachment on the attachers themselves, but authorized the pole custodian to transfer the facilities if the attachers did not meet the required deadline. If the pole custodian did not comply with the deadlines, they would be subject to fines. Notwithstanding this rule, the number of



double poles throughout the state swelled to 24,672 by June 1, 2022, with over 15,000 of those in delayed status.

In December 2022, the Authority approved a pilot program through its Final Decision in Docket No. 21-07-29, Single Visit Transfer Process for Double Poles (SVT Decision), to test a “single visit transfer” process (SVT Pilot Program) over a six-month period in six communities around the state (three in Eversource territory and three in UI territory). This pilot was implemented by a mutually selected contractor to make all simple transfers on double poles in those six communities, while collecting data on the status and cause of delays related to poles.

EOE filed its report on progress made, lessons learned, and any modifications made during the pilot phase on August 22, 2023. EOE surveyed stakeholders involved in the SVT Pilot Program including Eversource, UI, Frontier Communications of Connecticut, New England Cable and Telecommunications Association, Inc. (NECTA), Rocky Mountain Fiber Plus (Rocky Mountain), Charter Communications Entertainment I, LLC (Charter), Comcast of Connecticut (Comcast), NetSpeed, LLC (NetSpeed), Crown Castle Fiber, LLC (Crown Castle), and Lumen Technologies, Inc. (Lumen). The survey revealed that the SVT Pilot Program was largely successful over the six-month test period. There were no safety issues, no unscheduled customer interruptions, no traffic control issues, and most importantly, double poles had been significantly reduced in the six pilot communities. Further, the contractor retained to implement the pilot was able to address both simple and complex transfers, and successfully coordinated with pole attachers and the EDCs.

Despite this success, EOE’s report also concluded that there are still challenges that persist in implementing this program in the long term. Eversource and the contractor both highlighted persistent labor and materials shortages that cause delays. An additional concern is the cost and responsibility of ensuring that all pole transfer data, both pre- and post-work, is accurately documented. Both EDCs have indicated that while it is reasonable for them to be responsible for updating the database, a SVT Program at scale would be a significant undertaking. Ideally, the contractor conducting pole transfers would be able to perform this data recording. Unfortunately, the database currently in use does not support this kind of user interface; EOE therefore recommended that the Pole Attachment Working Group continue to discuss what modifications to the database are achievable to facilitate efficient updates and allow contractors to engage with it.

In compliance with the direction in the Authority’s SVT Decision, EOE submitted updates on the SVT Pilot Program in February and August 2024. In these reports, EOE highlighted ongoing issues regarding the accuracy of data reporting in the SVT program and the incompatibility of the database software. However, in the September 2024 update, EOE reported that the database software provider had proposed improvements to the Working Group that appear to help address issues and streamline the SVT process. The costs of such improvements and how to

allocate them were planned for discussion at the next Working Group meeting(s) and will be reported on by EOE in its report to PURA, due by February 22, 2025. Additional details on the removal of double poles can be found in Section 8: Office of Education, Outreach & Enforcement.

## **Ensuring Continuity of Public Telecommunication Resources**

In addition to supporting the deployment of broadband and ensuring the structural safety of the poles throughout the state, the Authority determines and approves funding for important public services each year including certain state-directed grants, Connecticut's Enhanced Emergency 911 (E-911) program, and community access television funding.

### **PEGPETIA**

In 2007, the General Assembly established the Public, Educational and Governmental Programming and Education Technology Investment Account (PEGPETIA) program to promote and improve public, educational, and governmental programming and to support education technology initiatives through the enactment of Public Act 07-253, An Act Concerning Competitive Video Services. This account is funded by a quarterly tax on the gross earnings of video service providers, while the Authority is responsible for determining the allocation of accumulated funds into the account and administering grants to eligible entities.

Each year, PURA opens a proceeding where it accepts applications for funding. The Authority opened Docket No. 23-10-02, Allocation of Public Educational and Governmental Programming and Education Technology Investment Account Pursuant to Conn. Gen. Stat. Sec. 16-331cc, on September 12, 2023, to distribute \$3,006,596 in available funding.

Fifty percent (50%) of available funding is allocated to local community television councils, the state-wide video advisory council, public, educational, and governmental programmers and public, educational, and governmental studio operators; the other fifty percent (50%) is allocated to boards of education or other entities offering education technology initiatives. In the event that the total amount requested by eligible applications for one category is less than 50%, and the other is greater, PURA may reallocate excess funds to the other category.

The Authority received a total of 117 applications. The Authority delegated the review of the applications to EOE and directed that office to file a motion with a draft proposed decision. EOE filed the motion on March 25, 2024, finding 113 of the 117 applicants to be eligible with 39 seeking a total of \$4,348,165.63 for "public, educational and governmental" programming (PEG Grants) and 74 seeking a total of \$11,161,306.75 for "education technology initiatives" (ETI Grants). Over 20% of the budget items in those applications were for costs that are ineligible for PEGPETIA funding, such as expenses for permitting, travel, lodging, and salaries. PEGPETIA

grant funds may not be used on non-equipment costs such as salaries, service agreements, or stipends. As noted in the application, non-equipment costs, such as design and engineering, installation, training, warranties, or insurance, must be reasonable and should be limited to less than 10% of the overall grant. Software may be categorized as equipment. A complete list of awardees and the amount of funding received is available in the decision.

[Read the 2024 PEGPETIA Final Decision.](#)

**Table 11: 2024 PEGPETIA Requests, Funding, and Awards**

Grant Type	Total Request	Funding Available	Awarded
PEG	\$3,055,535	\$3,055,535	\$3,055,535
ETI	\$6,647,582	\$4,144,465	\$4,061,070
<b>Total</b>	<b>\$9,703,117</b>	<b>\$7,200,000</b>	<b>\$7,116,605</b>

### **E911 Program**

The Authority is statutorily responsible for determining the amount of the monthly fee to be assessed on each telephone service, commercial mobile radio service (CMRS or wireless), customer-owned coin operated telephone (COCOT) service, and Voice over Internet Protocol (VoIP) subscriber to fund the administration of the E-911 program. PURA bases this fee on:

1. The operating budget established by Department of Emergency Services and Public Protection (DESPP), taking into consideration any existing moneys available in the Enhanced 9-1-1 Telecommunications Fund;
2. A progressive wire line inclusion schedule (excluding CMRS) that considers “the final report of the task force to study enhanced 9-1-1 telecommunications services established by Public Act 95-318;” and
3. A maximum fee of \$0.75 per month per access line.

The Authority calculates the E-911 monthly assessment fees for non-CMRS customer accounts with multiple lines using a progressive schedule. In other words, the more lines on an account, the less the account pays per line. Telecommunications companies report the total number of accounts based on number of lines to PURA, while DESPP reports the annual operating budget for the E-911 program. Examples of expenses comprising this budget include database services, network management and maintenance, translation services, regional telecommunications centers, and training. Using these values, PURA can calculate a per-line monthly fee necessary to fund the program.

In Docket No. 24-01-05, Annual Assessment Proceeding to Fund the Development and Administration of the Enhanced Emergency 911 Program – 2025, using the telecommunications companies’ provided line numbers and the 2025 E-911 budget of \$38,370,646.17 provided by DESPP, PURA calculated a single-line fee of \$0.73 per month. Accounts with more than one line pay a lower rate per line on a

progressive scale, as low as \$0.15 per line. The \$0.73 per line fee is a five cent increase over 2024, which was a two cent decrease from 2023.

[Read the 2025 Enhanced E-911 Decision.](#)

### ***Annual Community Access Support Review***

Public access television programming provides benefits that are not necessarily easily quantified but are nonetheless important public services, such as enhancing a sense of community and First Amendment rights. Connecticut law requires multichannel television companies (e.g., cable or satellite television), referred to as “multichannel video programming distributors” (MVPDs) to fund public community access programming (CAP) by assessing a baseline \$5 per year charge on each of their customers. The Authority is responsible for determining whether this charge should be adjusted each year to reflect any increase or decrease in the consumer price index (CPI) in the previous year.[1]

Further, the Authority can adjust the community access subscriber fee amount for each MVPD within a range of 40% above or below the statutory benchmark, as adjusted for inflation, based on the following criteria:

- The level of public interest in community access operations in the franchise area;
- The level of community need for educational access programming;
- The level and breadth of participation in community access operations;
- The adequacy of existing facilities, equipment and training programs to meet the current and future needs of the franchise area; and
- Any other factors determined to be relevant by the Authority.

Through Docket No. 24-01-06, Annual Community Access Support Review, PURA assessed the subscriber fee amount for each MVPD that took effect on July 1, 2024. Using data from the Bureau of Labor Statistics, PURA found that the 2023 rate of inflation as measured by the CPI for the Northeast Urban Region is 2.59%. To determine the +/-40% range within which the per subscriber amount can be set, the Authority adjusts the original statutory \$5/subscriber amount for inflation. In the 2023 Decision, the Authority found that the statutory amount as adjusted for inflation was \$10.82. Increasing this amount by 2.59% for 2023 CPI inflation equates to a value of \$11.10. Forty percent of \$11.10 is \$4.44. Consequently, the community access support per subscriber for each MVPD must be between \$6.66 (\$11.10 - \$4.44) and \$15.54 (\$11.10 + \$4.44). The Final Decision in Docket No. 24-01-06 thus calculates the 2024 subscriber fee for each MVPD, which all fall within the statutory range identified above.

[Read the 2024 Community Access Support Final Decision.](#)

## Maintaining Standards of Service

### ***Frontier Quality of Service Standards Violations Enforcement (Docket No. 24-01-15RE01)***

On July 10, 2024, the Authority issued a “Notice of Violation and Civil Penalty,” or an “NOV,” to Frontier Communications (Frontier) for the amount of \$2,481,800. PURA received a petition from OCC in January 2024 for PURA to investigate Frontier’s quality of service compliance. As a result of this investigation, PURA’s NOV stated that Frontier had repeatedly failed to meet quality of service standards between January 15, 2023, and December 31, 2024.

Service standard regulations for all telephone companies and certified telecommunications service providers have been in place in Connecticut since November 8, 2000.[2] Per statute, these standards are designed to “include, but not be limited to, measures relating to customer trouble reports, service outages, installation appointments and repeat problems as well as timeliness in responding to those complaints or reports.”[3] To enforce its regulations, PURA is authorized by Title 16 of the General Statutes to prescribe up to \$10,000 for each violation, with each distinct violation considered a separate offense.

Companies that receive an NOV have the right to request a hearing within 20 days of receiving an NOV. If they do not, they must comply with the orders in the NOV. On July 29, 2024, Frontier submitted its request for a hearing, which was scheduled for November 6, 2024. However, on November 4, 2024, Frontier and OCC jointly filed a motion requesting that the hearing be cancelled so that they could finalize the negotiation of a settlement. PURA granted the motion.

On November 14, 2024, Frontier and OCC jointly filed their negotiated settlement, which would result in \$860,000 in bill credits to impacted Frontier customers, in addition to more detailed semi-annual reporting by Frontier. The Office of the Attorney General noted its support of the settlement. The Authority approved the settlement on November 19, 2024, provided that OCC notify PURA immediately of any non-compliance that could trigger additional future NOV(s) in the future.

This proceeding highlighted the importance of the various roles in Connecticut’s utility regulation ecosystem, and the procedures in place to successfully enforce the standards of service and protection of customers.

[Read the Settlement Motion Ruling.](#)

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[1] General Statutes § 16-331a(k).

[2] Conn. Agencies Regs. §§ 16-247g-1 – 16-247g-9

[3] General Statutes § 16-247p(a)

## 2024 TELECOMM. & UTILITY POLE SECTOR DECISIONS

Docket Number	Title	Decision Date
<a href="#">23-10-02</a>	Annual Allocation of Public Educational and Governmental Programming and Education Technology Investment Account pursuant to Conn. Gen. Stat. § 16-331cc	5/1/2024
<a href="#">24-01-05</a>	2024 Annual Assessment to the Emergency Enhanced 911 Program	5/15/2024
<a href="#">24-01-06</a>	Annual Community Access Support Review	5/29/2024
<a href="#">24-01-15</a>	Petition of Office of Consumer Counsel for Investigation of Quality of Service Standards for The Southern New England Telephone Company d/b/a Frontier Communications	7/10/2024
<a href="#">24-01-41</a>	Request to Transfer Community Access Provider Designation	8/7/2024
<a href="#">24-05-11</a>	Petition for Declaratory Ruling on Behalf of Communications Workers of America Local 1298 Regarding General Statutes 16-42	10/23/2024
<a href="#">24-06-15</a>	Petition of Verizon New York Inc. to Reclassify Remaining Services as Competitive and to Retire the Alternative Form of Regulation Plan	10/16/2024

A comprehensive list of PURA 2024 decisions is available in Appendix 2, attached to this Report.





## SECTION 7: GRID MODERNIZATION

The electric sector and its infrastructure are the veins and arteries that power modern society. Nationally, the electric sector accounts for approximately 5% of the gross domestic product (GDP). Indirectly, the electric sector contributes much more, enabling businesses and industry to create the goods and services that make up the remaining 95% of the GDP and improving productivity, health, safety, comfort, and convenience. However, today's electric grid faces new and growing challenges such as rising energy demand, growing deployment of distributed energy generation resources (DERs) like rooftop solar, ambitious climate and energy policies, and increasing storm frequency and intensity. These, and other challenges, are impacting the affordability, resilience, and reliability of our electric distribution system.

In response to these challenges, PURA determined that it needed a distinct strategy for grid modernization, separate from traditional electric sector regulation. In October 2019, PURA issued an Interim Decision in Docket No. 17-12-03, PURA Investigation into Distribution Planning of the Electric Distribution Companies (EMG Interim Decision) outlining the Authority's framework for investigating both near- and long-term strategies to implement an Equitable Modern Grid (EMG) for Connecticut. This framework is designed to foster innovative solutions that address the major challenges and opportunities facing the electric sector and has four objectives:

- Support (or remove barriers to) the growth of Connecticut's green economy;
- Enable a cost-effective, economy-wide transition to a decarbonized future;
- Enhance customer access to a more resilient, reliable, and secure commodity; and
- Advance the ongoing energy affordability dialogue in the state, particularly in underserved communities.

All four objectives are inextricably connected and, thus, no single objective can be accomplished without the others if an Equitable Modern Grid is to be achieved. Similarly, the whole of an Equitable Modern Grid is greater than the sum of its parts, as the realization of each objective can further the achievement of the others.

The 2019 EMG Interim Decision introduced 11 sub-topics for further investigation through a series of “reopened” proceedings, where PURA has been and, in

one case, continues to evaluate potential solutions for their cost-effectiveness and ability to meet the objectives of the framework in the long-term. Since 2019, PURA has initiated decisions or final reports in all 11 reopeners, with several having moved into the annual program review stage. The reopeners and their progress are as follows:

### What is a "reopener docket"?

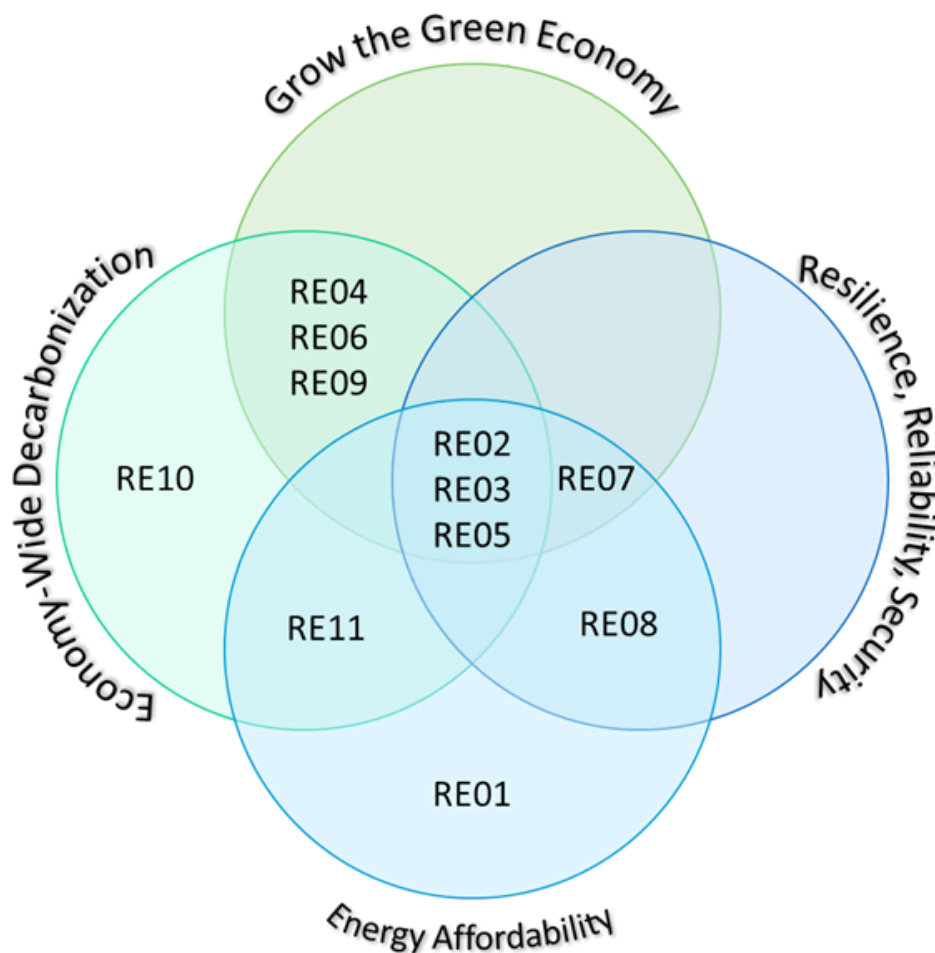
A docket that is initiated to either reassess or continue evaluating a specific part of the original docket's decision. It helps to maintain continuity between related dockets. "Reopened" proceedings use the naming convention "###-##-##re0#" in PURA's docket database.

**Figure 7: Progress Across EMG Reopener Dockets**



Though each reopener contributes towards all four EMG objectives, some further more of the objectives than others. Figure 8 below helps to demonstrate the relationship between each topic and the EMG objectives, and PURA's strategy to ensuring all four are accomplished through this comprehensive approach.

**Figure 8: Reopener Alignment with EMG Objectives**



## KEY GRID MODERNIZATION TOPICS IN 2024

As demonstrated by Figure 4 above, each EMG reopener docket addresses one or more of the original EMG Interim Decision objectives. The Authority has now issued final decisions, or final reports, in all eleven of the EMG reopener dockets, and has moved on to full implementation of the programs and policies designed by these final documents.

In 2024, the Authority continued to build and maintain momentum towards achieving the EMG Framework's objectives. In Docket No. 24-05-01, Annual Review of Affordability Programs and Offerings, PURA approved or modified the utilities' plan for implementing the New MPP, pursuant to Public Act No. 23-102, and associated communications materials. Additionally, PURA issued a decision in Docket No. 17-12-03RE11, PURA

Investigation into Distribution System Planning of the Electric Distribution Companies – New Rate Designs and Rate Reviews, approving a five-tiered Low Income Discount Rate (LIDR), which will help support energy affordability for all electric customers. In Docket No. 17-12-03RE06, PURA Investigation into Distribution System Planning of the Electric Distribution Companies – Interconnection Standards and Practices, PURA initiated, led, and completed a 100-day working group sprint with the EDCs, developers, and other stakeholders to help identify collaborative solutions to ongoing issues related to interconnection of DERs statewide. The Authority also enhanced community access to solar PV by establishing a specific carve out in the NRES program for solar deployed at public schools, pursuant to Public Act No. 24-151, in Docket No. 24-08-03, Annual Non-residential Renewable Energy Solutions Program Review – Year 4. In Docket No. 24-08-08, Non-wires Solutions Process Phase, the Authority completed the set up for implementation of the Non-wires Solutions (NWS) Program in 2025. Finally, the Authority approved nine new innovation pilot projects through Docket No. 23-08-07, Innovative Energy Solutions Program Cycle 2, which will join the seven approved through Cycle 1 that all made substantial progress throughout 2024.

## **Progress Advancing Energy Affordability**

Each year, PURA conducts a comprehensive review of the energy affordability and arrearage forgiveness programs (AFP) offered by the EDCs and LDCs through one consolidated proceeding. The annual review process provides the Authority with an opportunity to assess these programs' effectiveness at addressing ongoing energy affordability issues, particularly for low-income or disadvantaged communities, as well as their impact on reducing overall unpaid utility bills. The programs available to help customers pay their bills are the result of collaboration between the Authority, the utilities, the Office of Consumer Counsel, EOE, the Department of Social Services (DSS), the General Assembly, low-income and community advocates, and other stakeholders with a commitment to ensuring these offerings are as helpful to customers as possible. These programs include the following summarized by Table 12.

**Table 12: Connecticut Energy Affordability and Arrearage Forgiveness Programs**

Program or Policy	Definition	Eligibility	Enrollment Process
Financial Hardship Verification	A designation that protects eligible residential customers from service shut-off during the winter and makes them eligible for certain energy affordability programs.	Customers who receive public assistance benefits from DSS, have a household income of <60% of State Median Income (SMI), or have a serious or life-threatening medical condition.	Contact your electric utility, or your local <a href="#">Community Action Agency (CAA)</a> , or Operation Fuel.
Medical Protection	Residential customers with serious medical conditions are protected from service shut-off during the winter. Customers with a life-threatening medical condition will be protected from shut-off during the certification period.	A customer's medical condition is certified as serious or life-threatening by a registered physician, advanced practice registered nurse (APRN), or physician assistant (PA).	The registered physician, APRN, or PA complete a certification of illness form online via an online medical web portal.
Connecticut Energy Assistance Program	Applies direct funding (typically in the range of \$250-\$600) towards your heating bill	Customers who also receive public assistance benefits from DSS, or have a household income of <60% of State Median Income (SMI).	Apply directly at your local CAA.
Matching Payment Plan	A payment plan for hardship customers heating with electricity or gas with past-due balances. Each payment made by the customer is matched by the utility until the balance is eliminated.	Customers who qualify as medical or financial hardship through DSS or a Community Action Agency (CAA) who have past-due balances.	Contact your local natural gas or electric utility company, or CAA directly.



Program or Policy	Definition	Eligibility	Enrollment Process
Low-Income Discount Rate	As of January 1, 2024, Eversource and United Illuminating offer tiered discounts on a customer's bill based on their income.	Customers who are at or below 60% of SMI will receive at least 5% off of their bill each month. Customers that fall below 60% of SMI may qualify for additional discounts depending on what income threshold they meet that corresponds with four additional tiers. The maximum discount is 50% off of their monthly electric bill.	Customers who are verified as financial hardship are automatically enrolled. Otherwise, contact your electric utility, CAA, or Operation Fuel directly to submit proof of income.
Flexible Payment Plan	A payment plan for any active electric, residential customer with a past-due balance. Customers make monthly payments to prevent service shutoff.	Any active electric, residential customer of Eversource or United Illuminating.	Contact your electric utility company directly.

These programs are designed to ensure that as many customers and their varying circumstances can be addressed as possible. The official objectives of the programs are to:

1. Help customers maintain service by offering payment plans to help them resolve their past due balance and make timely payments;
2. Help reduce past due balances for eligible financial hardship customers with a past due balance by offering matching arrears forgiveness with their timely payments;
3. Increase awareness of and participation in energy assistance, weatherization, and relevant clean energy programs, including but not limited to Residential Renewable Energy Solutions (RRES) and Energy Storage Solutions (ESS) programs; and
4. Evaluate collections management practices for those with past due balances along with the cost and affordability impact on all customers.

The Authority conducted its review of the 2024-2025 Program Year for these programs through Docket No. 24-05-01, Annual Review of Affordability Programs and Offerings (Energy Affordability Annual Review), (2024 AFP Decision). Key findings, issues, and program modifications included in the November 6, 2024, Decision in this docket are discussed below.

### ***Matching Payment Plan (MPP) Program***

Connecticut law provides that residential electric or gas customers with unpaid utility bills who meet income qualifications are eligible to enter into an amortization agreement with their utility to reduce their unpaid balance. The Matching Payment Plan (MPP) program offered by the Eversource and Avangrid Companies (together, Companies) is the programmatic implementation of this law. Through the MPP, financial hardship customers (i.e., customers who receive public assistance benefits from DSS and/or have a household income of <60% State Median Income) are put on a payment plan to eliminate past-due utility balances. Each payment made by the customer is matched by the utility until the balance is eliminated.

In 2023, Section 30 of Public Act 23-102 made amendments to the MPP including the eligibility criteria, the calculation of a customer's matching payment, the timing of the distribution of matching payments, and the utilities' recovery of costs incurred. Specifically, the revised MPP is no longer limited to residential customers of the utilities using gas or electricity for heat, allowing oil-heating customers to participate. Additionally, residential customers are no longer required to apply for benefits available under CEAP or a state-appropriated fuel assistance program. Rather, residential customers are now only required to meet the income eligibility requirements of CEAP or a state-appropriated fuel assistance program, but are nonetheless encouraged to apply. Residential customers also must be eligible for financial hardship programs with the gas or electric distribution company. Residential customers are still required to authorize the gas or electric distribution company to send a copy of the customer's monthly bill directly to any energy assistance agency for payment and to enter into and comply with an amortization agreement that is consistent with decisions and policies of the Authority.

In the 2023 AFP proceeding, both Eversource and UI testified that the changes to MPP would take multiple months to implement. As such, the Authority directed the utilities to make the IT changes necessary to implement the New MPP no later than November 1, 2024, which is the start of the 2024 MPP program year, and to provide an update regarding such changes and the utilities' implementation of the New MPP in the 2024–2025 AFP Plan in next year's annual affordability proceeding, Docket No. 24-05-01.

On May 31, 2024, the Companies filed their 2024-2025 AFP Plan in Docket No. 24-05-01 as a motion for approval. Traditionally, this plan is reviewed through stakeholder process and approved via a Final Decision; however, in this year's filing, the Companies requested approval of certain plan components by August 15, 2024, in order to implement required modifications prior to the launch of the Plan and New MPP on November 1, 2024. In order to ensure that these modifications would be completed in time, the Authority focused stakeholder input on those sections of the Plan in order to issue a motion ruling authorizing the Companies to proceed. After receiving the 2024-2025 AFP Plan, PURA issued two sets of interrogatories, three sets of written comments and held a technical meeting. The Authority incorporated this feedback into a motion ruling issued on August



19, 2024.

However, following the Motion No. 7 ruling, PURA received an additional motion filed jointly from EOE and OCC requesting further clarification on some of the points in the ruling including (1) when the 12-month period begins and resets when a customer re-enrolls in New MPP after a broken payment arrangement; (2) what “all missed payments” means relative to the requirement to re-enroll after a second broken payment arrangement; (3) whether there is a limit on the number of payments a customer can miss after breaking their first payment arrangement and being permitted to re-enroll on their second; and (4) whether there is a flexible payment arrangement available for customers with a financial hardship designation. Additionally, docket participants provided further information in briefs that caused the Authority to reevaluate certain topics. The Authority provided additional clarification regarding these issues, in addition to the remaining proposals from the EDCs’ AFP Plan filed on May 31, 2024, that were not addressed in the Motion No. 7 Ruling, through issuance of the Final Decision issued on November 5, 2024. Key Proposals or modifications to proposals, and any clarifications approved through the Motion No. 7 Ruling, as well as any subsequent changes approved through the Final Decision, are summarized in Table 13 below.

**Table 13: Connecticut Energy Affordability and Arrearage Forgiveness Programs**

Topic	Authority Motion No. 7 Clarification or Determination	Authority Final Decision Clarification or Determination
Customer Eligibility	<ul style="list-style-type: none"> <li>Oil-heating customers may now participate in New MPP.</li> <li>Customers are no longer required to receive a Connecticut Energy Assistance Program (CEAP) award in order to participate in New MPP.</li> <li>Customers must have a \$100 arrearage that is 60 days past due.</li> <li>Customers may enroll in New MPP with both their electric and gas utility.</li> </ul>	No change
Monthly Payment Calculation	<ul style="list-style-type: none"> <li>The monthly payment shall not include the amount of CEAP award reasonably anticipated; rather, the monthly payment shall be revised when a CEAP or other energy assistance benefit is received.</li> <li>A customer’s arrearage is required to be reduced by an amount equal to:</li> </ul>	<ul style="list-style-type: none"> <li>Directed EDCs to provide a joint proposal for the optimal approach to application of CEAP awards to New MPP customer’s bill, arrearage or both by January 31, 2025.</li> </ul>

Topic	Authority Motion No. 7 Clarification or Determination	Authority Final Decision Clarification or Determination
	<ul style="list-style-type: none"> <li>◦ the customer's monthly payment pursuant to an amortization agreement, provided the customer meets the MPP eligibility criteria for the month immediately preceding such payment; and</li> <li>◦ any payment a customer who meets the New MPP eligibility requirements receives from CEAP, a state appropriated fuel assistance program, or other energy assistance sources.</li> <li>• The monthly payment arrangement will be re-evaluated every 6 months.</li> </ul>	<ul style="list-style-type: none"> <li>• Approved Companies' proposal to calculate new MPP monthly payments using retail rate at time of enrollment with a reevaluation of the monthly payment every six months.</li> </ul>
Matching Payment Distribution	<ul style="list-style-type: none"> <li>• Matching payments must be distributed monthly over a 12-month period, from November 1 through October 31.</li> <li>• The monthly payment must be affordable to the customer and satisfy the Authority's decisions and policies.</li> </ul>	<ul style="list-style-type: none"> <li>• No Change</li> </ul>
Program Year	<ul style="list-style-type: none"> <li>• The New MPP program year operates between November 1 to October 31 annually.</li> <li>• There is no longer a phased program year structure under New MPP.</li> </ul>	<ul style="list-style-type: none"> <li>• No Change</li> </ul>
Financial Hardship Expiring	<ul style="list-style-type: none"> <li>• Participants will receive a 30-day grace period after their financial hardship designation expires before being removed from New MPP.</li> </ul>	<ul style="list-style-type: none"> <li>• No change</li> </ul>

Topic	Authority Motion No. 7 Clarification or Determination	Authority Final Decision Clarification or Determination
Program Removal	<ul style="list-style-type: none"> <li>Participants will be removed from New MPP after two consecutive missed monthly payments.</li> <li>Participants will be removed upon “successful completion;” that is, after they have made sufficient payments with associated matches to eliminate their arrears.</li> </ul>	<ul style="list-style-type: none"> <li>No change</li> </ul>
Reenrollment	<ul style="list-style-type: none"> <li>Participants can be reenrolled an unlimited number of times within a 12-month period as long as they meet all eligibility criteria and all missed payments have been made up.</li> <li>All New MPP participants will be auto-reenrolled every November 1.</li> </ul>	<ul style="list-style-type: none"> <li>New MPP missed payments are payments required by a customer’s calculated New MPP monthly payment arrangement.</li> <li>Customers that fail out of New MPP more than twice in a 12-month period shall be eligible to enroll on a flexible payment arrangement.</li> <li>If a customer is removed from New MPP and enrolls in a flexible payment arrangement, any payments made by the customer while enrolled in the flexible payment arrangement cannot be used to satisfy the requirement to pay missed New MPP payments used to reenroll in New MPP.</li> <li>Note that PURA stayed this requirement in a motion ruling following the decision and now requires customers to make up missed MPP payments to reenroll.</li> </ul>

Topic	Authority Motion No. 7 Clarification or Determination	Authority Final Decision Clarification or Determination
MPP Term	<ul style="list-style-type: none"> <li>A customer may continue to participate in New MPP annually so long as they meet the requirements of New MPP.</li> </ul>	<ul style="list-style-type: none"> <li>No change</li> </ul>
Cost Recovery	<ul style="list-style-type: none"> <li>Approved Eversource's and UI's proposals to cease offering New Start and BFP, respectively, to new customers when New MPP is offered, i.e., by November 1, 2024.</li> <li>A customer enrolled in New Start or BFP prior to November 1, 2024, may continue on the program until the date the customer's New Start or BFP, respectively, ends or the customer fails to comply with the program's participation requirements, whichever occurs first.</li> </ul>	<ul style="list-style-type: none"> <li>The Companies are directed to report in the next AFP filing, i.e., Docket No. 25-05-01: (1) the number of remaining customers on the voluntary AFPs; (2) the minimum, average, and maximum amount of customer arrearages for those still enrolled in a voluntary AFP; and (3) the number of customers that transitioned from a voluntary AFP to New MPP during the 2024–2025 program year.</li> </ul>
Voluntary Arrearage Forgiveness Programs	<ul style="list-style-type: none"> <li>Approved Eversource's and UI's proposals to cease offering New Start and BFP, respectively, to new customers when New MPP is offered, i.e., by November 1, 2024.</li> <li>A customer enrolled in New Start or BFP prior to November 1, 2024, may continue on the program until the date the customer's New Start or BFP, respectively, ends or the customer fails to comply with the program's participation requirements, whichever occurs first.</li> </ul>	<ul style="list-style-type: none"> <li>The Companies are directed to report in the next AFP filing, i.e., Docket No. 25-05-01: (1) the number of remaining customers on the voluntary AFPs; (2) the minimum, average, and maximum amount of customer arrearages for those still enrolled in a voluntary AFP; and (3) the number of customers that transitioned from a voluntary AFP to New MPP during the 2024–2025 program year.</li> </ul>

Topic	Authority Motion No. 7 Clarification or Determination	Authority Final Decision Clarification or Determination
Customer Communications	<ul style="list-style-type: none"> <li>Approved draft energy New MPP communication materials including letters, text alerts, emails, on-bill messages, fact sheets, social media posts, and web pages.</li> </ul>	<ul style="list-style-type: none"> <li>Approved with modification remaining customer communication materials.</li> <li>Directed the creation of an Energy Affordability Customer Communications Working Group dedicated to reviewing energy affordability customer communications materials. The Authority will no longer review each individual customer communications item for approval.</li> </ul>

### ***Utility Collections Practices***

In the Companies' 2024-2025 AFP Plan, they highlighted increasing arrearages that support a reevaluation of current collections practices. Residential customer legal collections and wage garnishment activities were previously paused, pending further stakeholder discussion and the outcome of the Wage Garnishment Working Group established in Docket No. 22-03-16RE01, Petition of the Office of Consumer Counsel for an Investigation into the United Docket No. 24-05-01 Illuminating Company and Eversource Energy Regarding Collections Practices During the COVID-19 Moratorium – Avangrid NOV. OCC completed its activities and filed the Wage Garnishment Working Group Report on July 27, 2024. In this Report, OCC recommended that the Authority allow the Companies a “modified model of a total prohibition” on wage garnishments. Specifically, OCC recommended that the wage garnishment practice generally be prohibited; however, the Companies “could proactively seek authorization to request a wage execution” when the Companies can demonstrate that a customer has “sufficient income and/or assets” such that wage garnishment would not unduly burden the customer. Importantly, OCC clarified that financial hardship customers should be exempt from wage garnishment.

While the Authority is committed to providing affordable energy bills to low-income customers, it must balance the interests and impacts for all ratepayers. Past-due balances can ultimately increase costs for all customers, including those that are low- to moderate income. The Authority therefore determined that legal collections for all residential customers may resume.

Legal collections activities are one tool the Companies have to encourage those customers that are otherwise challenging to engage, such as those that cannot be disconnected because of medical protection or inaccessible meters. Accordingly, the Authority permitted the Companies to resume legal collections activities on January 1, 2025, for customers that fall at or above the 75% state median income (SMI) threshold. Importantly, setting the threshold for legal collections at 15% higher than the threshold (i.e., 60% SMI) used to qualify customers as financial hardship, who are protected from wage garnishment, also protects the most financially vulnerable medically protected customers. The Companies were also directed to track wage garnishment throughout the year and make such data available to stakeholders upon request.

Additionally, the Authority determined that the flexible payment parameters for non-hardship customers should be modified. As of the 2024 decision, non-financial hardship customers are now required to pay 10% of their arrearage, instead of 5%, to prevent shut-off. The DSS data sharing agreement now ensures that the majority of hardship-eligible customers are correctly coded and will not be incorrectly assessed a payment more appropriate for non-hardship customers. Further, the higher payment may incentivize customers to maintain their payment arrangements while minimizing cost-prohibitive payments for moderate income customers.

[Read the 2024 Annual Affordability Programs and Offerings Review Final Decision.](#)

### ***Low-Income Discount Rate (LIDR)***

In 2022, PURA directed the EDCs to implement a LIDR for electric customers with an overall eligibility cap at 60% State Median Income (i.e., Tier 1) and eligibility for Tier 2 aligned with existing state benefit programs (i.e., up to 160% FPG) through its October 19, 2022 Final Decision in Docket No. 17-12-03RE11, PURA Investigation into Distribution System Planning of the Electric Distribution Companies – New Rate Designs and Rate Reviews (LIDR Decision). The creation of these two tiers centered around two objectives: (1) achieving energy affordability, considered to be no more than 6% of a household's annual income being spent on energy costs; and (2) reducing uncollectible expenses paid by all ratepayers, in part by reducing the need for service disconnections and reconnections.

The LIDR offering officially launched on January 1, 2024. Customers enroll through their EDCs, local CAAs, or Operation Fuel. Additionally, the EDCs launched an opt-out customer data sharing agreement with the Department of Social Services (DSS) in January 2024, where eligible customers were auto-enrolled onto the appropriate LIDR

tier. Through this agreement, the Companies send DSS a data file every month that consists of all active residential accounts. DSS then analyzes whether the customers currently receive public benefits, and then respond to the Companies and indicate whether each account is eligible for financial hardship, and for electric customers, whether they are eligible for LIDR Tier 1 or Tier 2.

However, following implementation of the DSS data-sharing agreement, it was discovered that the number of Tier 2 eligible customers far exceeded initial expectations. In February 2024, Eversource estimated that an additional 115,000 DSS-identified customers were eligible for Tier 2, which would create about \$100 million in incremental annual LIDR expense. As a result, program costs were going to be much higher than anticipated in the LIDR Decision. As such, the Authority directed the Companies to temporarily enroll all DSS-identified eligible customers onto Tier 1 only, and initiated an investigation in Docket No. 17-12-03RE11 into whether to modify the LIDR Decision.

Through this investigation, PURA and docket participants compared multiple combinations of numbers of tiers, discount amounts, and income thresholds to understand participant and ratepayer impacts of various LIDR structures. As a result, it was determined that a five-tiered, rather than two-tiered, structure was in the best interest of all ratepayers; specifically, those customers who originally qualified for Tier 2 but were placed on Tier 1 during the interim step. By implementing five tiers, customers avoid a discount “cliff” when their income increases. In other words, rather than drop from a 50% to 10% discount, under a five-tiered structure customers would gradually shift up and down discount levels with shifts in income.

This revised LIDR structure also is more effective at containing the overall cost burden to ratepayers. During the investigation, it was also determined that establishing a “budgetary target” of 2% of total electric revenues for the LIDR Program would help control costs. Under a budgetary target, if the 2% budget of all total revenues is exceeded in a given year by more than 0.1% of total revenues (i.e. 2.1%), a review is triggered and the level of the discount is reduced so that costs are contained within the budgetary target. Importantly, the discount levels established in the new five-tiered structure (i.e. 5%, 15%, 20%, 40%, and 50%) were selected based on an analysis of expected enrollments and costs for each tier that would result in an estimated annual cost of 1.6% of Eversource’s annual revenue, and 1.8% of UI’s.

A summary of the approved five-tiered LIDR and the corresponding income criteria or qualifying DSS program is summarized in Table 14 below.



**Table 14: Approved Five-Tier LIDR and Income Eligibility Thresholds**

New Tier	Discount Amount	Gross Income Limit (Federal Poverty Level)	Prior Tier
<b>Tier 1 (212–275% FPL   60% SMI)</b>			
ALMB/SLMB	5%	212–246%	1
Husky B Band 1	5%	292–254%	1
Husky B Prenatal	5%	263%	1
Husky A Pregnant / Postpartum	5%	263%	1
Husky C Long Term Services and Supports	5%	225%	2
Special / Limited Medical Benefit	5%	263%	1
CEAP Level 3	5%	275% (60% SMI)	1
<b>Tier 2 (161–211% FPL)</b>			
SNAP	15%	200%	2
CEAP Level 2	15%	200%	1
Husky A Children	15%	201%	2
QMB (lowest \$ Medicare Savings Program)	15%	211%	2
<b>Tier 3 (126–160% FPL)</b>			
Husky D	20%	138%	2
Husky A Parent	20%	138%	2
<b>Tier 4 (101–125% FPL)</b>			
CEAP Level 1	40%	125%	2
<b>Tier 5 (Up to 100% FPL)</b>			
Temporary Family Assistance	50%	55%	2
Refugee Assistance	50%	55%	2
Husky C (non-LTSS)	50%	58%	2
SAGA	50%	225%	2
State Supp	50%	225%	2

In many cases, the Authority directs the utilities to implement programs in coordination with each other to ensure consistent customer experiences statewide. However, in this proceeding, PURA determined that allowing Eversource to implement the five-tier LIDR as quickly as possible, while allowing UI an additional year due to IT constraints, was in the best interest of rate payers. DSS has estimated being able to provide data-sharing for all five tiers by May 2025. Both companies are directed to track and report on an annual basis in the relevant RAM proceeding data regarding the cost to implement LIDR and enrollment data.

[Read the 2024 LIDR Final Decision.](#)

## **Progress Enabling Decarbonization**

### ***Interconnection Working Group - 100 Day DER Interconnection Sprint***

A key enabling component of the electric distribution system to ensure deployment of solar PV systems, battery electric storage systems, and other kinds of distributed energy resources (DERs) is the ability to support two-way flows of energy. DERs are an important tool to meeting the state's climate goals, and can be an even more important tool in providing customers with resiliency solutions and providing demand flexibility, which provides benefits to both the customer and the grid at large. To unlock the benefits of DERs, however, they must be interconnected to the grid. While this sounds simple, without carefully designed standards in place, a new interconnecting resource could compromise the reliability or safety of the distribution system; conversely, inefficient interconnection standards and protocols can inhibit the timely deployment of DERs.

In 2020, PURA established an Interconnection Working Group, led by EOE, tasked with: (1) reviewing interconnection guidelines and application forms; (2) improving transparency in the interconnection process; (3) examining technical criteria/screens; (4) monitoring IEEE-1547 developments; (5) evaluating hosting capacity maps; and (6) considering the establishment of a formal technical regional working group. The Working Group is comprised of PURA, OCC, DEEP, CIEC, two developer representatives, Eversource, and UI, and meets on a monthly basis.

Since the Interconnection Working Group's establishment, numerous additional interconnection issues have arisen, particularly within the annual reviews of the Non-Residential Renewable Energy Solutions (NRES) and Energy Storage Solutions (ESS) Programs. The NRES and ESS Programs have faced challenges such as: (1) delays in processing applications; (2) complexities in technical reviews; (3) unilateral project withdrawals by EDCs; (4) unresponsive developers; (5) disputes between developers and EDCs; and (6) unclear interconnection requirements.

The Authority has previously endeavored to direct changes to interconnection processes within individual clean energy program proceedings.[1] However, the lack of tangible improvements to interconnection outcomes to date and stakeholder feedback indicate

the need for comprehensive interconnection solutions across clean energy programs.

Rather than address the above-referenced issues on a case-by-case basis in the Authority's clean energy program annual review proceedings, the Authority determined it would be more efficient to collaboratively discuss solutions to the remaining interconnection issues with stakeholders via the Interconnection Working Group. This group was tasked with finding solutions for current and emerging interconnection issues, including but not limited to: (1) delays in EDC-led interconnection approval processes; (2) ambiguities in interconnection guidelines and approval timelines; (3) insufficient hosting capacity for new distributed energy resources; (4) communication breakdowns between project developers and the EDCs; (5) slow response times from the EDCs to developer inquiries; (6) inconsistencies in interconnection guidance or approvals among EDC departments; and (7) the potential need for a pre-submission checklist to inform developers of interconnection requirements before application submission. Consistent with prior "sprint" working groups directed by PURA, the Interconnection Sprint Working Group was given 100 days to resolve outstanding interconnection issues, including the problems identified above.

The Interconnection Sprint Working group met nine times between October 3, 2024, and December 9, 2024. On December 20, 2024, PURA staff assigned to lead the Sprint Working Group filed the 100-Day Sprint Working Group Report identifying and recommending for approval 26 proposals that achieved consensus support among working group members. These proposals fell into three distinct categories: (1) updates to PowerClerk or EDC data; (2) updates to the Interconnection Guidelines; and (3) updates to EDC processes or procedures. The 100-Day Sprint Working Group Report additionally identified 18 proposals that did not achieve consensus approval.

Sprint Staff requested that the EDCs provide cost and timeline estimates for all consensus proposals adopted by the Working Group by December 21, if feasible. In response, the EDCs submitted cost and timeline estimates for the consensus proposals as part of their written comments. However, in many cases, these estimates remain uncertain.

The Authority will consider the recommended proposals and determine whether they should be approved in early 2025. Additionally, the Authority will evaluate which issues remain unresolved and will address these issues as appropriate, including submitting possible recommendations to the General Assembly.

[View the 100-day DER Interconnection Sprint Report.](#)

### ***Promoting Equitable Access to Clean Energy***

As described in the 2024 Annual Clean and Renewable Energy Report, attached to this report, Connecticut has made continuous progress in deploying renewable energy statewide. An ongoing objective for the state's clean and renewable energy technology programs is to ensure equitable access to these resources for all customers. In 2024, two

changes to existing programs approved by PURA that will help further that objective in particular included the creation of a distinct “School Category” in the Non-residential Renewable Energy Solutions Program (NRES) program, and opening the Residential Renewable Energy Solutions Program (RRES) to master-metered multifamily affordable housing.

In Docket No. 24-08-03, Annual Non-Residential Renewable Energy Solutions Program Review - Year 4 (Year 4 NRES Decision), PURA and stakeholders developed an offering for NRES projects at public schools, in accordance with Public Act 24-151 Section 173, which required the Authority to develop a program to encourage the installation of up to 25 MW of solar PV systems and energy storage systems at public schools annually. Accordingly, the Decision created a distinct NRES “School Category” and directed bids to be awarded on a “first-ready” basis to prioritize projects based on their viability. To accommodate a non-competitive auction approach, the Decision set a fixed Buy-All price for the solar component of school category projects at \$188.90 per MWh, the same as the Buy-All price cap for the NRES medium zero-emission category.

In Docket No. 23-08-02, Annual Residential Renewable Energy Solutions Program Review - Year 3, PURA issued a second decision on July 10, 2024, approving master-metered multifamily affordable housing to participate in the RRES. Previously, only individually metered multifamily affordable housing was eligible for the program. The decision approved the Multifamily Housing Working Group’s proposal to allow master-metered affordable housing to receive RRES benefits, as long as properties distribute at least 25% of the tariff’s financial value to tenants through eligible building upgrades.

Both of these modifications will help to distribute the benefits of clean energy to more customers, especially those that are not able to install solar themselves.

Read the [NRES Final Decision](#), and the [July 10, 2024 RRES Final Decision](#).

## **Progress Supporting Resilience & Reliability**

### ***Non-Wires Solutions Process***

In 2022, PURA issued a Decision in Docket No. 17-12-03RE07, PURA Investigation into Distribution System Planning of the Electric Distribution Companies - Non-Wires Alternatives (NWS Decision), establishing a process to transparently leverage competition to identify and deploy non-wires solutions (NWS) to meet distribution system needs with the ultimate objectives of improving grid resilience and reliability, as well as improved outcomes for customers (NWS Process). As technology has changed over time, new options are available to lower system costs and improve outcomes, and specifically to avoid, defer, or reduce the cost of necessary grid investments. In addition, EDCs are now permitted by statute to own energy storage systems under a wider range of conditions than previously possible. The NWS Process enables the Authority and stakeholders to receive the necessary and appropriate information to evaluate the prudence of EDC

investments, including EDC-owned energy storage.

Further, in the NWS Decision, PURA determined that the NWS Process and its policy objectives would greatly benefit from the expertise and oversight of an official PURA Process Monitor. Given the role of the EDCs in this process, oversight and transparency is key to the provision of results in the public interest. The PURA Process Monitor would act as an extension of lead staff in the annual NWS Process proceedings to supplement existing staff expertise in its oversight of the NWS Process and will provide expertise in areas in which Authority staff expertise does not currently exist. Further, given the importance of the robust stakeholder process called for by many docket participants, the PURA Process Monitor would assist in the creation of key NWS Process materials and analytical tools to provide information to stakeholders and facilitate their input.

Thus, PURA conducted a public solicitation for proposals from consultants to serve as the NWS Process Monitor in 2023. On May 4, 2023, PURA officially retained Optimal Energy (formerly identified as NV5) to serve as the NWS Process Monitor. Generally, the Process Monitor's responsibilities will include stakeholder engagement, development of NWS process materials, data review and analysis, oversight of each electric distribution company's (EDC) solicitations, and providing feedback to the Authority.

The NWS Process Monitor began the NWS Process Initiation phase identified in the NWS Decision in 2023, which progressed throughout 2024 through Docket No. 24-08-08, Non-wires Solutions Process Initiation Phase (NWS Process Initiation Phase). From June 2023 to June 2024, the Process Monitor facilitated stakeholder engagement and reported findings on task-level research, and develop the corresponding deliverables and final recommendations to PURA. These key deliverables included, but were not limited to:

- Any additional requirements and format for the annual Grid Needs Filing;
- NWS solicitation benefit-cost analysis model and process;
- Timelines for competitive NWS solicitation processes;
- Applicability of the existing regulations regarding codes of conduct for EDCs and their affiliates and any additional policies and protections needed to allow EDC affiliates to submit a competitive NWS bid;
- Plans for ongoing market engagement activities and RFI documents; and
- A standard set of data to be provided to prospective NWS solicitation bidders, which shall include, at a minimum, the information listed in Exhibit C and any relevant information from the EDC Data and Grid Needs Filings.

The NWS Process Initiation Phase also includes review, discussion, and potential modification to deliverables being developed by the EDCs, including but not limited to:

- A standard cybersecurity data access policy and pre-approval process, including non-disclosure agreements (NDAs) and data security agreements (riders) that specify vendor security requirements;

- The standard RFP to be issued by the EDCs for a NWS solicitation, inclusive of any processes to screen and qualify bidders, which shall include relevant information from the cybersecurity data access policy; and
- The pro forma contract for NWS bidders to execute with the EDC upon selection, including performance criteria and an EM&V plan.

The Process Monitor facilitated ten stakeholder meetings and two technical sessions that, similar to a working group, were open to all stakeholders and provided an opportunity to provide input on the NWS Process in a collaborative setting outside of the more structured and formal setting of a PURA-led technical meeting.

Subsequently, the Authority convened a number of in-person roundtable discussions to further address comments and concerns regarding the filed materials. On August 29, 2024, the Authority conducted the first roundtable discussion on the annual data filings and the system needs suitability criteria. On September 19, 2024, the Authority conducted the second roundtable discussion on the NWS Competitive Solicitation Process and the EDCs' developed materials. On October 1, 2024, the Authority conducted the third and final roundtable discussion on the benefit cost analysis (BCA) framework.

On December 18, 2024, PURA issued the Final Decision in NWS Process Initiation Phase, formally completing the materials, design documents, and steps for the first NWS Process Cycle. Below is a timeline for the first NWS Process Cycle, which launched officially on February 8, 2025, in Docket No. 25-08-08, Non-wires Solutions Process Cycle 1.

**Table 15: Timeline for the None-wires Solution Process Cycle 1**

Date	Process Milestone	Frequency
February 8	EDC Data and Grid Needs Filing	Annual
First Friday in February	First Quarter Filing for Investments between \$250,000 to \$500,000	Quarterly
Late February	Q1 Stakeholder Meeting: Discuss EDC Data and Grid Needs Filing	Annual
March 22	EDC Annual Reliability Report Data Filing (includes SAIDI, SAIFI, CEMI, CELID, CEMSMI)	Annual
May 1	Discovery for data filing officially closed	Annual
First Friday in May	Second Quarter Filing for Investments between \$250,000 and \$500,000	Quarterly
May 15	NWA Process Monitor Comments	Annual
Late May	Q2 Stakeholder Meeting: Discuss Process Monitor Comments	Annual

Date	Process Milestone	Frequency
June 15	Stakeholder Comments	Annual
First Friday in August	Third Quarter Filing for Investments between \$250,000 and \$500,000	Quarterly
August 15	PURA Screening Decision and Competitive solicitation process begins	Annual
September	Q3 Stakeholder Meeting: Discuss PURA August Decision	Annual
First Friday in November	Fourth Quarter Filing for Investments between \$250,000 and \$500,000	Quarterly
November	Q4 Stakeholder Meeting: Discuss Potential NWA Process Improvements	Annual

[Read the NWS Process Initiation Phase Final Decision.](#)

### **Advanced Metering Infrastructure**

In 2019, the EMG Interim Decision identified advanced metering infrastructure (AMI) as essential to achieving the objectives of a modern electric grid for Connecticut. AMI is a tool available to the EDCs to better understand, plan, and operate their system, but that same information is also important to customers and market-based opportunities to help customers better manage their consumption and save money. Specifically, AMI enables a number of functions that conventional utility meters cannot provide including automatic measurement of granular energy usage data, remotely identifying and isolating outages, and monitoring voltage. These functions unlock a whole host of new customer offerings such as time-of-use energy rates or advanced rates for EVs, greater control over energy consumption using smart technology, and load-shifting. For utilities, AMI allows reduced costs related to metering and billing, better visibility of the grid and power quality, faster outage restoration, and improved operations efficiency. AMI will accelerate the modernization of Connecticut's electric grid in numerous innovative, cost-effective, and equitable ways.

Today, about 84% of customers in UI's territory have AMI. The AMI deployment in UI territory has allowed the company to realize many operational benefits such as remote meter reading, service order automation, proactive outage planning, storm restoration efficiencies, the validation of resilience/reliability measures, early outage detection, system planning optimization, energy theft reduction, provision of detailed billing data, rate design, enhanced online portals, high-bill alerts, outage status, customer targeting for initiatives, and reduced billing-related calls to the call center. UI expects that the benefits will continue to accrue for the listed categories and expects the benefits to



increase as existing Automatic Meter Reading (AMR) meters are replaced and as additional features of more advanced AMI meters and systems are available that can provide load disaggregation, load balancing, voltage monitoring, and voltage reduction. In Eversource's territory, however, more than 75% of Eversource's customers still have standard meters (AMR meters) that are 20 or more years old. The other 25% have "bridge meters" that work with the AMR meters but can be enabled to work with an AMI system. To support AMI, Eversource would not only need to install meters, but it would also need to install and integrate the following with meters and existing systems: communications systems; back-office systems; meter data management; and customer information systems.

As such, achieving statewide deployment of AMI and the realization of its associated benefits will require significant capital investment from ratepayers. After three years of a comprehensive public process in Docket No. 17-12-03RE02, PURA Investigation into Distribution System Planning of the Electric Distribution Companies – Advanced Metering Infrastructure, including numerous opportunities for stakeholder input, guidance from industry experts such as federal agencies, peer jurisdiction utilities, and technology providers, PURA released a framework for the deployment of AMI in a final Decision on January 3, 2024. This framework provides a regulatory roadmap for the EDCs, protects ratepayers, and ensures that the investment in AMI will advance the economic, energy, and environmental policy goals of Connecticut. Importantly, this Decision also outlined a process to assess the prudence of any costs associated with the deployment of AMI in accordance with the outlined framework during the EDCs' future, respective contested rate proceedings.

### **Utility AMI Cost Recovery**

During the proceeding, Eversource stated that the company requires a certain cost recovery path to move forward with an AMI investment on an accelerated timeline of five years. Previously, Eversource had proposed approximately \$400 million of capital investment over the first five years of AMI deployment (approximately \$80 million per year). Eversource claims that due to both the level of costs and the short timeline with which they are to be incurred, it is necessary that cost recovery be granted at defined intervals during the deployment window outside of a general rate case, such as through the annual RAM proceedings. Importantly, Eversource has stated publicly in numerous investor and public settings that it intends to file a general rate case application in 2025, which would be its first time since 2017.

Using the upcoming rate proceeding to provide cost recovery for AMI investments has several benefits. First, Eversource would be able to obtain fairly synchronized recovery (i.e., low regulatory lag) of any AMI capital investments made in 2024 and during a significant portion of 2025, depending on the application timing. Second, the Authority would have the opportunity to consider a multi-year rate plan that incorporates AMI investments through a 2025 rate proceeding. Such a multi-year rate plan could provide

the same reduction in regulatory lag and rate shock as an annual rate reconciliation mechanism. Third, in a rate case proceeding, the Authority could also consider establishing a reconciliation mechanism for post-2025 AMI investments if necessary and appropriate. Further, in a general rate case, a cost-of-service study may be developed and evaluated to ensure AMI costs are equitably shared by the different customer classes.

That being said, the Authority recognizes that the anticipated capital costs outlined above, while not entirely incremental, may be significant and incremental relative to the business-as-usual core business investments. The costs are also largely concentrated in a five-year deployment period. Taken together, these factors may potentially necessitate consideration of an extraordinary ratemaking measure, such as the implementation of an annual cost reconciliation mechanism. Given this, the Authority initiated a docket simultaneously to releasing its framework decision on January 3, 2024, under Docket No. 17-10-46RE04, Application of the Connecticut Light and Power company d/b/a Eversource Energy to Amend its Rate Schedules – AMI Cost Recovery.

The Authority conducted an investigation through this docket and, within 11 months, on December 4, 2024, established an extraordinary cost recovery mechanism for Eversource's AMI deployment (AMI Tariff). The Authority largely adopted the Company's proposed AMI Tariff, making some necessary clarifications to ensure that Eversource receives only those costs necessary to support deployment and that customers are protected from paying more than is warranted. The Company is not required to utilize the AMI Tariff since, as stated above, they could seek cost recovery through a general rate proceeding. Rather, the Authority offered the cost recovery mechanism to assist in Eversource's accelerated deployment of AMI.

In providing metering, billing, and other services (traditional utility services that are enhanced by AMI), the Company is required to provide safe, reliable, affordable, and available electric service to all customers in a uniform, equitable, and prudent manner. Further, the Company must provide the services with economy, efficiency, and care for public safety and energy security; promote economic development; consider the need for energy conservation and energy efficiency; and provide protection for relevant foreseeable public interests. The AMI Decision outlines in detail how AMI can provide these services to the benefit of ratepayers. While the AMI Decision provides a regulatory roadmap for Eversource to take advantage of AMI, Eversource does not require Authority approval to deploy AMI. Indeed, Eversource may deploy AMI at any time, as has been commonly done by other utilities throughout the country. UI has achieved nearly full deployment of AMI and did so without a special cost recovery mechanism. Eversource is currently implementing AMI in Massachusetts, and has hired staff who have been involved in AMI deployment in at least seven other states, including Florida, Indiana, Kentucky, Massachusetts, North Carolina, Ohio, and South Carolina.

Despite the Authority providing Eversource with a clear pathway for the deployment of AMI and an extraordinary cost recovery mechanism to support Eversource's accelerated

deployment of AMI, the Company has not yet initiated the deployment of AMI in Connecticut. Instead, on December 9, 2024, the Company requested that the Authority reconsider the AMI Cost Recovery Decision for the purpose of fully satisfying the Company's AMI Requirements. According to Eversource, it will not be able to commence its AMI deployment before October 1, 2025, and can only do so then if the Authority addresses the four Company AMI Requirements.

Importantly, the AMI Tariff is an accommodation for Eversource and was intended to allow the accelerated deployment of AMI. As of today, Eversource can make a prudent investment in AMI and, under the approved AMI Tariff, has available to it an extraordinary cost recovery mechanism. The Authority will reconsider the AMI Cost Recovery Decision, on an appropriate schedule, and will provide notice and an opportunity to all stakeholders to submit written comments on the Company AMI Requirements.

[Read the December 4, 2024 AMI Tariff Final Decision.](#)

## **Progress Growing the Green Economy**

### ***Innovative Energy Solutions (IES) Program***

Innovation is a natural complement to modernization; one that can, if harnessed, greatly enhance the benefits and services delivered to ratepayers. With the increase of data availability, grid-edge visibility, and distributed energy resources comes significant opportunities to optimize the grid, its resiliency and reliability, and the customer experience. However, the risk and uncertainty of requiring utilities to conduct traditional research and development or even to pilot new technologies or applications can often be too great to consider the expenses prudent. So, conventional strategies often continue to be implemented, even though novel and emerging options show promise to lower costs and/or improve service.

The Authority issued a decision in Docket No. 17-12-03RE05, PURA Investigation into Distribution System Planning of the Electric Distribution Companies -Innovative Technology Applications and Programs (Innovation Pilots), on March 30, 2022, officially approving the program design of the Innovative Energy Solutions Program (IES Program). The goal of this program is to enable the deployment of, on a limited basis, innovative pilot technologies, products or services, and to evaluate their performance. If satisfactory ratepayer benefits are demonstrated, the innovation(s) could be scaled up for statewide deployment by the EDCs.

There are two features of this program that distinguish it from other pilots or test beds. The first is that it employs guardrails and project "off-ramps" to ensure value and to minimize ratepayer risk. The IES Program is structured into four phases, where potential innovations are reviewed with increasing scrutiny to ensure that their product or service meets the needs of Connecticut's grid and ratepayers, and can deliver their claimed benefits or value at scale. If a project cannot meet the criteria and thresholds at a certain phase, the Authority will be able to quickly retire the project, thereby avoiding unnecessary risk and costs to ratepayers.

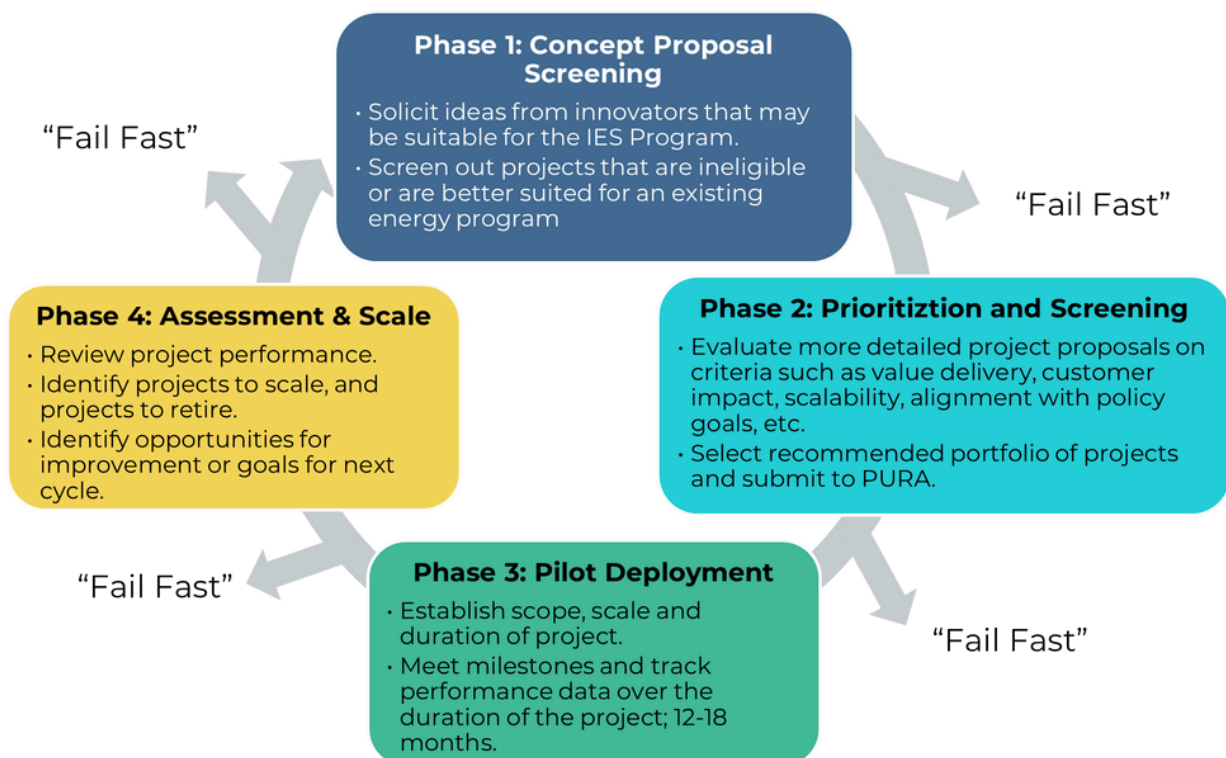
The second feature addresses the inverse situation where a pilot project demonstrates substantial ratepayer and grid benefits. In this case, the IES program provides a clear pathway by which to move a successful pilot project to full-scale deployment across the state's two largest EDCs' territories, which the traditional approach to EDC pilots have lacked nationwide to date. This ensures that successful pilots are brought to scale, thereby delivering the benefits of innovation to all ratepayers.

The IES Program also places a high value on transparency, which is achieved through the external Innovation Advisory Council (IAC) comprised of a representative set of stakeholders, who would have a responsibility for ensuring a balanced perspective in the IES program.[2] Though the Authority is the primary entity responsible for developing, administering, and managing the IES Program, and retains ultimate decision-making authority over aspects of program design and project selection, the IAC provides a forum where potential participating innovators can engage and discuss the program without violating the standard communications rules with PURA. Additionally, the IAC will set the themes and objectives for each annual Program Cycle and will screen projects applications before submitting recommendations to PURA for final approval.

#### Four-Phase Program Cycle Design

The IES Program operates around a four-phase cycle, with a new cycle launching each year. Each cycle takes approximately two years to complete. The four phases are summarized in Figure 9 below.

**Figure 9: Connecticut IES Program Cycle Phases**



Phase 1 focuses on soliciting and screening concept proposals from innovators. The IAC assesses Phase 1 proposals on their ability to meet eligibility criteria including:

- Addresses current gaps in EDC offerings in Connecticut;
- Advances decarbonization;
- Addresses underserved communities in Connecticut;
- Avoids a competitive advantage for EDCs,
- Avoids an unreasonable impact to Connecticut ratepayers; and
- Will be authorized to practice business in Connecticut.

Projects deemed ineligible are directed to relevant existing programs in which they may participate, if applicable. Projects deemed eligible are invited to submit proposals in Phase 2 and are required to provide detailed information regarding the project's value proposition, business and financial model, strategic alignment with the IES Program objectives, equity provisions, scalability, and project team qualifications.

The Program Administrator and the IAC then evaluate these proposals and their ability to address key criteria such as Innovation Potential, Measurable Benefits, and Focus on Underserved Communities and Equity. The IAC then agrees to a recommended portfolio of projects to recommend to PURA for approval, staying within a total budgetary cap of \$25 million, or \$5 million per project. Phase 2 concludes with PURA's issuance of an interim decision in the relevant program cycle docket that provides an overview of the review and selection process and announces the successful projects for deployment. Such interim decision may also include, but is not limited to, direction to the EDCs regarding contract provisions and other safeguards to minimize customer and utility risk regarding cost recovery, direction to the EDCs regarding interconnection agreements and/or treatment of selected projects in the distribution interconnection process/queue, details regarding program versus outside funding sources for each project, and a project-specific cost recovery cap.

During Phase 3, innovators will deploy their proposed projects based on an agreed-upon scope and scale within an approximately 12-18-month period. Cost recovery for selected projects is tied to their completion of project milestones to help reduce ratepayer risk, rather than upfront payment. The Authority reserves the right to terminate projects that do not adhere to programmatic guidelines or demonstrate an inability to meet program objectives and/or guidance provided by the Authority or the IAC. During the active lifetime of the project, innovators are also required to meet defined reporting requirements, with progress periodically reported to the Authority. The Authority and Program Administrator provide appropriate support and oversight via recurring review meetings with innovators to identify and discuss project progress, roadblocks, and rule derogations as needed.

In Phase 4, Assessment & Scale, innovators will be required to develop and submit a final report discussing project performance and lessons learned. Conclusions on project

performance are expected to inform decisions on project scaling, while lessons learned will provide valuable insight regarding the effectiveness of the IES program process that will benefit future projects. The Program Administrator will provide a brief report of recommendations based on the final reports submitted by innovators to assist the Authority in making informed decisions as to which projects should be identified for deployment at scale. This phase will promote discussion of potential opportunities for improvement or modification in future cycles based on lessons learned by innovators, the Program Administrators, the IAC, and the Authority.

It is expected that most projects will have a clear “go” or “no go” determination regarding scaling at the end of Phase 4. These determinations will be made as a final decision in the relevant IES program cycle docket. Projects that are ready to scale up will be invited to submit the appropriate regulatory application. Regulatory applications for successful project may include, but are not limited to, an application for the creation of a distinct, “scale up” docket or the incorporation of the project into existing state programs over which the Authority has jurisdiction. It is important to note that only the initiatives that demonstrate readiness to scale and are projected to accrue net benefits at scale as measured by multiple evaluation metrics, will be selected to scale. Projects that are not yet ready to scale but display promise and economic viability will have an opportunity to cycle back through the IES program with modifications in place, but this will be assessed on a case-by-case basis. Projects that do not display further potential to scale up upon assessment during Phase 4 will exit the IES program.

### **IES Program Cycle 1**

The first IES Program Cycle officially launched on January 31, 2023, in Docket No. 22-08-07, Innovative Energy Solutions Program Cycle 01. Each program Cycle focuses on a selected “theme” around which projects are solicited, but does not exclude proposals that fall outside that theme. The theme is discussed and voted on by the IAC with consideration from the EDC’s joint grid and customer needs reports, as well as other ongoing state policy and priority goals. The Cycle 1 theme focused on “Demand-side Flexibility,” which includes, but is not limited to, advanced forecasting, automation, flexible winter peak technology, and thermal storage.

The Authority approved seven projects totaling approximately \$10.4 million. Table 16 below provides a brief summary of the project, its status as reported in the December 2024 quarterly status reports, and highlights local economic impacts.



**Table 16: IES Program Cycle 1 Project Progress**

Company	Award	Description	Local Economic Benefit	Status as of December 2024
AmpUp	\$1,695,000	EV charging station management platform that assists EV charging station owners to balance and optimize load through revenue and data-driven use cases.	<ul style="list-style-type: none"> <li>AmpUp charger lab is based in East Hartford, CT</li> <li>3 existing FTEs at time of proposal; committed to hiring 2 more for the pilot.</li> </ul>	<ul style="list-style-type: none"> <li>2 FTEs confirmed to be hired.</li> <li>Working towards Milestone 4: Software Feature Development</li> </ul>
Edo	\$1,441,000	Demonstrate a low-cost, easy-to-install optimal control solution at 25 commercial buildings and behind-the-meter DER to optimize efficiency and provide load flexibility.	<ul style="list-style-type: none"> <li>Partnering with a CT-based (Windsor) firm to recruit customers, creating 5 part-time jobs during the pilot.</li> <li>At scale, Edo would open an office in CT and hire approx. 5 FTEs.</li> </ul>	<ul style="list-style-type: none"> <li>3 part-time jobs created to date and has successfully subcontracted with TRAC to conduct audits and analysis.</li> <li>Working towards Milestone 4: completion of marketing and outreach campaign and</li> </ul>
GridEdge Networks	\$500,000	Demonstrate the integration of an EV school bus with Vehicle-to-Grid (V2G) capabilities with the local grid.	<ul style="list-style-type: none"> <li>Expect to create at least 1 FTE to complete the pilot</li> <li>1 new office space</li> <li>Retain local CT engineering firm to perform onsite installation &amp; interconnection work</li> </ul>	<ul style="list-style-type: none"> <li>1 FTE created and subcontractor for engineering work selected</li> <li>V2G charger installed and an interconnection application is filed.</li> <li>Working towards Milestone 4: DERCOM system ready for field installation</li> </ul>



Company	Award	Description	Local Economic Benefit	Status as of December 2024
KrakenFlex	\$1,095,000	Deploy a real-time DERMS platform that enables EDCs to dynamically match supply with demand and optimize residential DERs like EV chargers and heat pumps to shift load strategically away from high load periods.	<ul style="list-style-type: none"> <li>Project manager based in CT to support the project.</li> <li>Will promote indirect economic sectors through increased installations of heat pumps and EV chargers in CT.</li> </ul>	<ul style="list-style-type: none"> <li>Project manager hired</li> <li>Working toward Milestone 9: – Mid-point Report. Working on recruiting customers now.</li> </ul>
Piclo	\$1,824,500	Deploy New England's first DER-enabled flexibility marketplace that connects EDCs experiencing grid congestion issues to DER aggregators, owners, and Flex Service Providers. This pilot will create a CT-specific marketplace.	<ul style="list-style-type: none"> <li>Two new FTEs created with an office in CT to support the project.</li> <li>Partnering with Connecticut Innovations and CTNext to promote the state as an innovative, future-looking area for business development.</li> </ul>	<ul style="list-style-type: none"> <li>Hired 1 FTE and one subcontractor. Has also acquired CT-based office space.</li> <li>Working towards Milestone 4: End-to-End test of data and performance calculation. Has well surpassed enrollment goal for flex-service providers.</li> </ul>
Smarter Grid Solutions	\$2,703,200	Demonstrate an interconnection platform for flexible load resources like energy storage, and EV chargers at commercial sites to allow EDC to reduce interconnection bottlenecks and manage grid constraints in real-time, providing additional hosting capacity for DER interconnection.	<ul style="list-style-type: none"> <li>Indirect economic benefits during pilot stage through increased load, installations of EV chargers, BESS, and DG projects, etc.</li> <li>At scale, support staff in-state may be required.</li> </ul>	<ul style="list-style-type: none"> <li>Working on Milestone 3: site recruitment. Have recruited two to participate so far that can serve as multiple use cases.</li> </ul>

Company	Award	Description	Local Economic Benefit	Status as of December 2024
Tantalus	\$1,113,308	Demonstrate the capabilities of a system that offers AMI and advance power quality measurement to pinpoint vulnerable assets across the distribution grid and enable EDCs to securely access and control behind-the-meter DERs.	<ul style="list-style-type: none"> <li>• CEO and Chief Legal &amp; Admin. Officer are already based in Norwalk, CT.</li> <li>• At scale, anticipates needing two or three additional offices and hiring 30-60 new staff. Also considering whether to deploy a manufacturing facility with 15-20 staff.</li> </ul>	<ul style="list-style-type: none"> <li>• Hired one additional FTE in Norwalk, CT and 1 local HVAC contractor.</li> <li>• Working toward Milestone 5: 50% Grid Management Deployment, though may face some delays due to local permitting and inspection issues.</li> </ul>

[Read the IES Cycle 1 Interim Decision.](#)

## IES Program Cycle 2

Cycle 2 of the IES Program proceeding began accepting Phase 1 proposals on January 1, 2024, under the theme, “Empowering Electrification.” Electrification refers to replacing direct fossil fuel use (e.g., propane, heating oil, gasoline) with electricity in a way that reduces overall emissions and energy costs. Transportation, electricity, and residential heating account for almost three quarters of Connecticut’s greenhouse gas (GHG) emissions, which by 2030, must be reduced by 45% from 2001 levels. Projects that fit within the Cycle 2 Theme of “Empowering Electrification” can reduce emissions across all sectors by electrifying equipment as electricity generation simultaneously shifts towards cleaner alternatives, creating a “win-win-win” for EDCs, customers, and the environment.

On December 11, 2024, PURA issued an Interim Decision in Docket No. 23-08-07, Innovative Energy Solutions Program Cycle 2, approving nine projects totaling \$11.7 million. Seven of the nine projects are innovator-led, and the other two, Noteworthy AI and Rhizome, are collaborative projects between the innovator and the EDC(s). The projects and the EDCs completed and filed contracts as of February 13, 2025, allowing the projects to officially commence. Table 17 below provides a brief summary of the project, and highlights local economic impacts.

**Table 17: IES Program Cycle 2 Selected Projects**

Company	Award	Description	Planned Local Economic Benefit
SPAN	\$1,625,000	Demonstrate smart electrical panel that can replace traditional electrical breakers and can monitor and control loads in the home, enabling electrification without service upgrades. Will deploy to 300 LMI households across both EDC territories.	<ul style="list-style-type: none"> <li>• Partner with local PosiGen contractor for deployment</li> <li>• Expected that 2 new FTEs will be created through the pilot</li> </ul>
ReVert	\$150,000	Install 5,000 Smart Plugs, designed to deliver intelligent plug load management across wide variety of appliances, in municipal buildings, public schools and nonprofit facilities in New Haven, CT.	<ul style="list-style-type: none"> <li>• 2 FTEs expected to be created</li> <li>• Based in New Haven, CT</li> <li>• Plan to partner with a technical high school</li> </ul>
Roundtrip EV	\$2,019,177	Public-private-partnership model for deploying electric refuse trucks in CT. Offers turn-key solution with the full suite of services to acquire, install, use and maintain a fleet of EV trucks. IES Program funds will support charging infrastructure and operational costs for five EV refuse trucks for deployment in Environmental Justice communities in East and West Stamford, CT.	<ul style="list-style-type: none"> <li>• 4 direct FTEs expected to be created</li> <li>• 14 indirect FTEs from vendors</li> </ul>
Noteworthy AI	\$1,784,750	Smart camera + AI mounted on utility fleet vehicles to passively collect and analyze data on condition of the electric grid as vehicles move on routine schedules. Pilot will mount cameras on two fleet vehicles and target 20%, or 34,000 poles in UI territory.	<ul style="list-style-type: none"> <li>• 8 direct FTEs expected to be created</li> <li>• Office expansion in New Haven, CT</li> </ul>

Company	Award	Description	Planned Local Economic Benefit
Bidirectional Energy	\$1,158,782	Virtual power plant platform that aggregates residential or light-duty EV chargers to enable them to operate as bidirectional, “vehicle to everything” (V2X) chargers. Project will provide VTX chargers and mobile app access to 100 customers.	<ul style="list-style-type: none"> <li>• 10 direct FTEs expected to be created</li> </ul>
SWTCH	\$1,246,150	Building-level energy management system that manages heat pumps and EV chargers at commercial and multifamily buildings to maximize building electrical capacity and minimize upgrades to allow electrification. Will deploy 10 EV stations and 10 heat pumps with a SWTCH Cortex system at a commercial building and multifamily building in Bridgeport, CT.	<ul style="list-style-type: none"> <li>• 3 direct FTEs expected to be created</li> <li>• Satellite office established in CT</li> <li>• Work with CT-based installers</li> </ul>
Rhizome	\$345,000	Resilience Investment software platform that allows EDCs to generate a “future climate risk profile” to strategically planned resilience upgrade investments. Will generate climate-related financial loss estimates up to 50 years into the future. Model will focus on UI territory.	<ul style="list-style-type: none"> <li>• Work with 3 UConn Grad students for 6 months</li> </ul>
Optiwatt	\$1,132,989	End-to-end platform targeted at homeowners to facilitate the installation of electrification measures in their home and provide ongoing management. Will provide concierge services incremental to offerings on existing EnergizeCT and EDC webpages.	<ul style="list-style-type: none"> <li>• 1.65 direct FTE expected to be created</li> <li>• Indirect jobs through local contractors for installations</li> </ul>
Voltpost	\$1,059,810	Retrofits lampposts into modular and upgradable EV chargers powered by a mobile app while reducing cost, timing, and footprint of chargers, and increasing accessibility and equitable access.	<ul style="list-style-type: none"> <li>• 2 indirect jobs expected to be created</li> <li>• 5 local contractors for installation</li> </ul>

[Read the IES Cycle 2 Interim Decision.](#)

### IES Cycle 3

Cycle 3 of the IES Program began accepting applications on January 1, 2025, under the theme “Smart Energy Communities.” Smart Energy Communities are defined as neighborhoods, districts, towns, or cities that strategically enhance local energy infrastructure or energy end-uses in ways that improve quality of life for their citizens. Projects deployed under this theme will demonstrate innovative energy solutions that can be easily replicated in other communities facing similar challenges.

Smart Energy Communities themed projects could include, but are not limited to:

- Applications of technology at the intersection of multiple critical sectors (e.g., energy and water);
- Co-location and optimization of energy technology;
- Co-location and optimization of energy technology and community resilience needs;
- Enhanced connectivity and IoT;
- Sustainable energy cost savings;
- Critical infrastructure resilience and reliability;
- Energy data management solutions;
- Incorporating sensors and their data into operations to improve efficiency;
- Increased accessibility to clean energy infrastructure;
- Strategic reuse of existing energy infrastructure;
- Clean transportation accessibility;
- Local energy workforce development; or
- Critical facilities’ energy infrastructure resilience.

Importantly, the IES Program will also accept proposals that address the priorities identified in the EMG Framework. Concept proposals were due by February 1, 2025.[3]

Additionally, because this Cycle has a strong community and municipal focus, the IAC developed a [short survey](#) that was opened in concert with the Phase 1 application specifically targeted at community leaders. The survey is designed to elicit feedback on potential types of solutions a community is interested in, and potential host sites for projects. Responses to the survey will help the IAC identify potential partners and locations for IES projects that will benefit ratepayers and residents alike. The survey was distributed to municipal leaders in early January 2025, but remains open to responses from other community leaders through February 28, 2025. For more information, interested parties should visit [www.ct-ies.com](http://www.ct-ies.com) or contact [info@ct-ies.com](mailto:info@ct-ies.com) with any questions.

### Additional IES Program Resources

- [IES Program Design](#)
- [Cycle 1 Interim Decision](#)

### Click to visit the IES Portal



### Click to Participate in the Community Survey

- [Smart Energy Communities Survey](#)

## 2024 CLEAN & RENEWABLE ENERGY PROGRAM UPDATES

Since 2021, the Authority has prepared and released an annual report summarizing the most up-to-date and comprehensive data available regarding ratepayer-funded clean energy programs in Connecticut. This Annual Clean and Renewable Energy Report (CRE Annual Report) is designed to provide transparency and insight into the state's CRE programs and procurements for all stakeholders and state policymakers. The CRE Annual Report is also intended to be a resource for state policymakers and stakeholders when considering potential modifications to state energy policy goals. In sum, the Authority's primary objective in the CRE Annual Report is to provide open access to the data from the CRE programs that are funded by Connecticut ratepayers.

Specifically, this report provides data regarding the following CRE programs and market segments:

- Residential solar photovoltaic (PV) systems
- Non-Residential solar PV systems
- SCEF Program
- Public Policy Contracts and Power Purchase Agreements (PPAs) selected through Department of Energy and Environmental Protection (DEEP) procurements
- Clean Energy Options Program (CEOP) / Voluntary Renewable Option (VRO) Program
- Renewable Portfolio Standards (RPS) Compliance
- EV Charging Program
- ESS Program

In 2023, the Authority began releasing its Annual Report concurrently with the CRE Annual Report. The 2024 CRE Annual Report will be finalized on February 19, 2025, in Docket No. 24-08-01, [2024 Clean and Renewable Energy Program Data and Report](#). The Authority remains committed to expanding and improving the type, quality, and presentation of the data included in the CRE Annual Report, and will seek to make incremental improvements each year, to the extent possible.

### 2024 Clean and Renewable Energy Report

- [See Appendix 3](#)
- [Report in Docket No. 24-08-01](#)

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[1] [See](#) UI Order No. 22 Compliance, Feb. 1, 2024, Docket No. 23-08-03; Motion No. 19, Docket No. 23-08-03, [Annual Non-Residential Renewable Energy Solutions Program Review – Year 3](#); Motion No. 20; Docket No. 23-08-03; UI Order No. 32 Compliance, Aug. 1, 2024, Docket No. 24-08-03; Eversource Order No. 32 Compliance, Aug. 15, 2024, Docket No. 24-08-03; Eversource Order No. 26 Compliance, Aug. 1, 2024, Docket No. 24-08-05; UI Order No. 26 Compliance, July 30, 2024, Docket No. 24-08-05, [Annual Energy Storage Solutions Program Review – Year 4](#); Order No. 28 Compliance, Aug. 1, 2024, Docket No. 24-08-05.

[2] Specifically, the IAC includes representation from PURA, OCC, DEEP, the Connecticut Green Bank, Connecticut Innovations, DECD, UI, Eversource, and the Acadia Center.

[3] The Phase 1 Application period was subsequently extended to February 28, 2025.



## 2024 GRID MODERNIZATION DECISIONS

Docket Number	Title	Decision Date
<a href="#">17-12-03RE02</a>	PURA Investigation into Distribution System Planning of the Electric Distribution Companies -Advanced Metering Infrastructure	1/03/2024
<a href="#">23-08-01</a>	2023 Clean and Renewable Energy Program Data and Report	2/14/2024
<a href="#">23-08-02</a>	Annual Residential Renewable Energy Solutions Program Review - Year 3	7/10/2024
<a href="#">24-08-02</a>	Annual Residential Renewable Energy Solutions Program Review - Year 4	10/16/2024
<a href="#">24-08-03</a>	Annual Non-Residential Renewable Energy Solutions Program Review - Year 4	11/6/2024
<a href="#">24-05-01</a>	Annual Review of Affordability Programs and Offerings (ENERGY AFFORDABILITY ANNUAL REVIEW)	11/6/2024
<a href="#">17-12-03RE11</a>	PURA Investigation into Distribution System Planning of the Electric Distribution Companies – New Rate Designs and Rates Review	11/20/2024
<a href="#">24-08-05</a>	Annual Energy Storage Solutions Program Review - Year 4	12/4/2024
<a href="#">24-08-06</a>	Annual EV Charging Program Review - Year 4	12/4/2024
<a href="#">24-08-04</a>	Annual Shared Clean Energy Facility Program Review - Year 6	12/11/2024
<a href="#">24-08-08</a>	Non-Wires Solutions Process Initiation Phase	12/18/2024

A comprehensive list of PURA 2024 decisions is available in Appendix 2, attached to this Report.

## SECTION 8: THE OFFICE OF EDUCATION, OUTREACH, & ENFORCEMENT (EOE)

PURA established the Office of Education, Outreach & Enforcement (EOE) in July 2020. Due to PURA's quasi-judicial structure, there are restrictions on communications between PURA staff and stakeholders or members of the public, particularly during active proceedings. These restrictions, known as the prohibition on "ex parte communications," are in place to ensure no individual participant gains an unfair advantage by obtaining additional knowledge over others involved in a docket. However, the complexity of many dockets and the docket process itself can make it challenging for stakeholders, especially those less familiar with Authority proceedings, to navigate effectively.

Additionally, certain topics under PURA's review can benefit from more flexible engagement structures, such as working groups, or could be addressed more efficiently through streamlined processes.

To address these needs, EOE was established with the primary goal of enhancing the customer service experience for ratepayers and non-traditional stakeholders interacting with PURA. Unlike PURA's decisional staff, EOE staff are not subject to the "ex parte" communication rules, allowing them to respond to questions and concerns from ratepayers and other parties using their specialized knowledge. However, EOE staff are prohibited from communicating with PURA's decisional staff and commissioners about active proceedings and cannot speak on behalf of the Authority.

### EOE ORGANIZATION

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EOE is comprised of three units; the Licensing & Certification Unit, the Mediation & Enforcement Unit, and the Education & Outreach Unit.

#### Licensing and Certification Unit

The Licensing & Certification Unit within EOE is tasked with analyzing and processing routine licensing and certification matters filed with PURA under the Authority's jurisdiction. This unit ensures compliance with regulatory requirements while maintaining a streamlined and transparent process for stakeholders. It also oversees reporting obligations and manages various administrative responsibilities, working closely with state agencies and utility stakeholders to uphold PURA's standards of accountability and operational efficiency.

In addition to licensing and certification, the unit provides guidance to applicants, evaluates compliance filings, and supports PURA's efforts to promote fair and consistent

practices across the regulated industries. By ensuring proper oversight, the Licensing & Certification Unit plays a critical role in fostering reliability and trust in Connecticut's public utility systems.

Additionally, this unit supports oversight and engagement with the EnergizeCT Rate board. The [EnergizeCT Rate Board](#) is Connecticut's official site for alternative electric supplier rates. EOE staff maintain the public facing Rate Board as well as the back-end functionality known as Rate Manager, and works with licensed electric suppliers to create public offers.

In 2024, EOE staff reviewed over 15,000 licenses and certifications statewide, including but not limited to electric and water submetering applications, renewable generator certification (Class I), electric supplier and aggregator licensing applications, wireline and wireless facilities, conduit excavations, and natural gas seller registrations:

- 15,392 Class I, II and III Renewable Energy Certifications
- 36 Electric Submetering Applications
- 10 Water Submetering Applications
- 21 Natural Gas Seller Registrations
- 21 Wireless Facilities Within the Public Rights-of-Way (1 closed without approval) Applications
- 51 Installation of Wireline Facilities Under and Over the Public Rights-of-Way Applications
- 28 Telcom Certificates of Public Convenience and Necessity (CPCN)
- 4 Requested Variances of Regulation 16-11-64
- 350 motions related to Conduit Excavations
- 21 applications to Investigate Multiple Dwelling Unit's Noncompliance with General Statutes § 16-333a
- 5 Electric Supplier License Actions, including one application and four relinquishments
- 19 Electric Aggregator Certifications

### ***EnergizeCT & Suppliers***

The Education & Outreach Unit also plays a critical role in overseeing and engaging with the EnergizeCT Rate Board, Connecticut's official platform for alternative electric supplier rates. The Rate Board provides consumers with transparent and accessible information to compare supplier offers, empowering them to make informed decisions about their electric service.

EOE staff are responsible for maintaining both the public-facing Rate Board and the back-end system known as Rate Manager. This includes ensuring the platform's functionality, accuracy, and reliability. EOE staff work closely with licensed electric suppliers to facilitate the creation and display of public offers, ensuring compliance with regulatory standards and providing clarity to consumers.

In 2023-2024, EOE staff provided support to thousands of customers by assisting them in accessing the Rate Board, explaining utility standard service pricing, comparing alternative generation offers, and navigating the enrollment process. These efforts are essential in helping ratepayers understand their options, make cost-effective decisions, and better manage their energy needs. The unit's work with the Rate Board reinforces PURA's commitment to consumer protection, education, and the promotion of fair competition within Connecticut's energy market.

### **NEPOOL**

This unit of EOE also supports the work of NEPOOL (New England Power Pool). EOE submits a detailed spreadsheet to NEPOOL GIS on a quarterly basis, prior to the closure of the NEPOOL GIS Trading Period. This spreadsheet lists the facilities that have been certified along with their certification effective dates. NEPOOL GIS reviews the submission to verify the accuracy of the NEPOOL GIS ID numbers and updates the system with the effective dates provided. These ID numbers and dates are essential for the issuance of Renewable Energy Certificates (RECs). NEPOOL is a voluntary association of participants in the wholesale electricity market in New England. It plays a critical role in the operation and administration of the region's energy market, under the oversight of ISO New England (ISO-NE), the independent system operator for the area.

### **Mediation & Enforcement Unit**

The Mediation & Enforcement Unit within EOE is an essential component of PURA's efforts to ensure accountability and regulatory compliance across Connecticut's utility sectors. This unit plays a crucial role in addressing disputes involving regulated companies, utilizing mediation to resolve conflicts whenever appropriate. In cases where mediation is not feasible, the unit is responsible for enforcing relevant regulations and statutes delegated to EOE. Additionally, it conducts independent investigations into issues related to PURA-regulated or licensed entities, ensuring that the entities operate in compliance with state laws and PURA orders.

In 2024, the Mediation & Enforcement Unit aligned its efforts with the overarching goals of the Authority and EOE, focusing particularly on supporting vulnerable and low-income customers. The unit dedicated significant resources to identifying and addressing challenges faced by hardship customers, including those struggling with utility bills and service access. These efforts were in line with PURA's broader mission to protect the interests of all ratepayers.

Throughout the year, the unit also closely monitored the activities of electric suppliers, non-compliant submetering operations and natural gas sellers operating in Connecticut. This included initiating investigations into the customer service practices of these entities to assess whether they were adhering to state statutes, regulations, and PURA's orders. By ensuring compliance and holding these entities accountable for their actions, the Mediation & Enforcement Unit worked to protect consumers from potential abuses,

misinformation, or substandard service practices. This proactive approach highlights PURA's commitment to transparency, fairness, and consumer protection.

As part of this work, EOE settled 14 supplier enforcement actions, amounting to over \$11 million in settlement and customer restitution cumulatively. Of this, approximately \$10.5 million has been directed to either hardship arrearages for Connecticut's financially vulnerable customers or Operation Fuel; additionally, half of a million dollars were directed toward customer refunds. These settlements were part of investigations into marketing actions as well as settlements for compliance violations.

As part of continued efforts to monitor supplier actions, in 2024, EOE:

- Streamlined and provided inputs to the Annual Renewable Portfolio Standards (RPS) program, among other efforts, through Docket No. 24-06-01, Annual Review of Connecticut's Electric Suppliers' and Electric Distribution Companies' Compliance with Connecticut's Renewable Energy Portfolio Standards in the Year 2023. Drafted the report to the legislature on suppliers, supplier licensing, and submetering applications in Docket No. 23-11-01, Annual Report to the Legislature – The State of Electric Competition. The report to the Connecticut General Assembly provides a comprehensive analysis of the state of competition in Connecticut's electric industry and the status of electric supplier licensing. Retail competition in the state's electric industry began in January 2000 when the generation segment was opened to competitive supply. This report evaluates the state of electric competition by examining a range of indicators. These include the average generation service charges and the Standard Service generation rates for both residential and business customers. By analyzing these metrics, the report highlights the impact of the competitive market on customers who choose to participate.

**Table 18: 2024 EOE-Facilitated Settlements**

Entity	Settlement/ Restitution	Docket No.	Docket Title	Description
Major Electric Energy Company, LCC	\$2,000,000	14-03-03	Application of Major Energy, LLC for an Electric Supplier License	Unauthorized customer enrollments and other practices; restitution offsets hardship arrearages at the EDCs.
Arcadia Power	\$147,000	24-03-04	Petition to Open Docket to Investigate Arcadia Power Inc.	Operating without a license and other infractions.

**Table 19: Other 2024 Enforcement Actions**

Entity	Settlement/ Restitution	Docket No.	Docket Title	Description
Revere Power	\$2,500	Undocketed	NA (Natural Gas Seller)	Infractions related to natural gas sales, operating without a license.
Strawberry Park	\$7,000	24-06-13	Application to Install and Operate and an Electric Submetering at 42 Pierce Rd, Preston, CT	Compliance with submetering regulations

Additional dockets brought to decision, administered by, and/ or included significant participation by EOE this year, include:

- EOE held a key role in supporting Docket No. 23-10-02, Allocation of Public Educational and Governmental Programming and Educational Technology Investment Account (PEGPETIA) pursuant to General Statutes § 16-331cc. Through this docket, PURA awarded grants from the PEGPETIA account, which had a total of \$3,006,662 available for distribution in 2023. In accordance with § 16-331cc(b), fifty percent (50%) of the available funding was allocated to “local community antenna television and video advisory councils; the state-wide video advisory council; public, educational, and governmental programmers; and public, educational, and governmental studio operators.” The other fifty percent (50%) was designated for “public, educational, and governmental” projects. The Authority received 113 qualifying applications for PEGPETIA funds: 39 applications for “public, educational, and governmental” projects and 74 for “educational technology initiatives.” Ultimately, PURA awarded \$1,503,301 to qualifying public, educational, and governmental (PEG) projects and \$1,503,295 to qualifying educational technology initiative (ETI) projects, ensuring an equitable and impactful allocation of the grant funds.
- In April 2024, EOE hosted a pivotal technical meeting known as the “Cable Summit” in Hartford, Connecticut. This gathering, held as part of Docket No. 24-03-17: Investigation into Video Service Provider Customer Service Practices, brought together PURA leadership and representatives from Connecticut's cable companies. The event aimed to address critical concerns surrounding customer service practices in the cable industry. One of the summit's primary objectives was to ensure that customers receive the assistance they need, promptly and effectively. During the meeting, EOE highlighted a significant issue: the excessive amount of time its

customer information representatives spend managing complaints related to cable companies' inadequate customer service. Key problems identified included companies failing to make their customer service phone numbers easily accessible and offering interactive voice response (IVR) systems that are not user-friendly. EOE's efforts in this docket resulted in meaningful improvements for both consumers and cable companies. The agency developed revised and detailed FAQs to address customer concerns more effectively and ensured accurate customer service contact information was made available to the public. Additionally, EOE established stronger internal communication channels with the cable companies, facilitating better handling of customer complaints. These actions significantly reduced the volume of complaint calls received by EOE. Beyond these immediate benefits, the Cable Summit led to lasting reforms. EOE set clear expectations for improved customer service practices and implemented annual compliance filing requirements for the cable companies to ensure ongoing accountability. This collaborative effort underscored EOE's commitment to enhancing the customer experience and holding the cable industry to higher service standards.

- In 2024, PURA initiated Docket No. 23-08-02RE01, Annual Residential Renewable Energy Solutions Program Review – Contractor Education and Enforcement, to empower the Office of Education, Outreach, and Enforcement (EOE) to implement compliance filing requirements for contractors in the Residential Renewable Energy Solutions (RRES) Program. These requirements aimed to ensure the program provided financial benefits to consumers and protected them from deceptive or misleading marketing practices. Over six months, EOE and Docket Control staff worked extensively with contractors, offering guidance through formal docket communications, emails, and phone calls. EOE reviewed thousands of contractor-submitted documents, ultimately issuing strikes to 58 contractors for failing to meet compliance requirements and to five contractors for marketing violations. These actions reinforced PURA's commitment to consumer protection and the integrity of the RRES Program. EOE participated in several ongoing dockets focused on helping vulnerable and low-income customers reduce outstanding arrearages. These efforts include but are not limited to continuing contributions to Docket No. 17-12-03RE11, PURA Investigation into Distribution System Planning of Electric Distribution Companies – New Rate Designs and Rates Review, Docket No. 24-05-01, Annual Review of Affordability Programs and Offering (Energy Affordability Annual Review), and 18-06-02RE01, Two Year Review Required Pursuant to Conn. Gen. Stat § 16-245 O(M). This work includes research, analysis, and investigation for the implementation of a Low-Income Discount Rate (LIDR) in Connecticut, and related oversight of practices by suppliers that have historically had disparate impact on low-income customers.
- EOE supported ongoing work in the rate case proceedings for Southern Connecticut Gas (SCG) and Connecticut Natural Gas (CNG) (Docket No. 23-08-01), and Connecticut



Water Company (Docket No. 23-08-01. EOE also began work on United Illuminating and Yankee Gas rate cases (Docket No.24-10-04 and Docket No. 24-12-01 respectively).

- EOE staff also served in a delegated capacity as the PURA procurement manager on certain matters, playing a critical role in three DEEP procurements in 2024 related to Battery Storage, Zero Carbon Solar, and Offshore Wind. In these efforts, the Procurement Manager represented the Authority as an independent participant.

## Education & Outreach Unit

The Education & Outreach Unit, which includes the "Resolution Center," serves as a vital resource for Connecticut utility ratepayers by addressing complaints, inquiries, and disputes related to public utilities. This unit acts as a conduit between consumers and utility companies, working to resolve issues efficiently while providing guidance on relevant utility regulations and services. It also equips complainants with educational resources to empower them in navigating their utility-related concerns effectively.

Beyond handling individual cases, the unit plays a proactive role in consumer education. It develops and distributes comprehensive educational materials about Connecticut's utility systems, regulations, and consumer rights. These materials are shared through various channels, including public forums, community events, webinars, and digital platforms, to ensure accessibility and widespread understanding.

The Education & Outreach Unit collaborates with other divisions within PURA to monitor and identify emerging issues or trends in consumer complaints. By analyzing this data, the unit helps to inform regulatory actions, improve utility practices, and enhance customer service standards across the state. In fulfilling its mission, the unit ensures that Connecticut's utility customers are informed, protected, and supported in their interactions with regulated entities.

Since 1995, PURA has maintained records of customer complaints and inquiries. Customers have numerous ways to contact the Authority's call center and submit a complaint directly or indirectly to EOE:

- Telephone, 8:30-4:30PM, Monday – Friday (except for state holidays)
  - Toll Free: 1-800-382-4586
- Email: [PURA.Information@ct.gov](mailto:PURA.Information@ct.gov)
- [Web Portal](#)

In addition to these direct-to-agency methods, PURA also receives complaints that have been referred to it via the state legislature, the governor's office, U.S. Representative and Senator offices, the OCC, the AG, municipal officials, and not-for-profit organizations and advocates.

The Education and Outreach team also manages the “[Utility Scorecard](#)” report. The Scorecard is a collection of 10 specific complaint types filed by Connecticut utility customers; data can also be viewed by time frames, location, intake specialist, status, reasons for call, and more.

In 2024, the Education & Outreach Unit responded to more than 9,200 complaints and inquiries. As a result of complaint resolution, EOE secured over \$143,000 returned to customers.

#### **PURA Utility Complaint Scorecard Data Types**

- Billing
- General Complaint/Quality of Interaction
- Installation
- Meter Test
- Outage
- Payment Arrangement
- Quality of Service
- Deposit
- Slamming
- Termination

**Table 20: 2024 Customer Complaints and Inquiries by Industry**

Industry Type	Quantity
Community Antenna Television	992
Electric	5,711
Natural Gas	496
Gas Reseller	2
General Info	956
Solar	26
Suppliers/Electric Aggregators	316
Telephone	542
Telephone Other	44
Video Service Provider	34
Water	127
<b>TOTAL</b>	<b>9,246</b>

**Table 21: 2024 Customer Complaint Resolution Amount by Industry**

Industry Type	Amount
Community Antenna Television	\$10,879.27
Cellphone	\$66,976.44
Electric	\$12,430.89
Natural Gas	\$16,206.32
Electric Supplier	\$17,105.42
Telephone/Local	\$18,414.91
Telephone/Other/CLEC	\$225.32
Video Service Provider	\$725.59
Water	\$435.00
<b>Total</b>	<b>\$143,399.16</b>

### ***PURA 101 Roadshow***

Key senior EOE staff supported [PURA 101 Roadshow](#) offerings both virtually and in-person across the state of Connecticut, educating the public on PURA, the regulatory process, and other important utility issues that matter to ratepayers. EOE supported in-person PURA 101 events at in, Windham, Middletown, Newtown, Vernon, Killingly, and Hartford in 2024.

## **WORKING GROUP PARTICIPATION**

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Representatives from EOE support PURA's roles in dozens of state-mandated working groups and subgroups, including but not limited to the Water Planning Advisory Group (WPAG), Interagency Work Group (IWG), the WPCAG Watershed Lands Work Group, Interagency Drought Workgroup, Water Utility Coordinating Committees, State Water Plan Outreach and Education Workgroup, and the Low Income Energy Advisory Board (LIEAB), which supports the planning, development, implementation, and coordination of energy-assistance-related programs and policies and low-income weatherization assistance programs and policies.

EOE also continues to lead the Vegetation Management Standing Working Group created by the Authority in Docket No. 17-12-03RE08, [PURA investigation into Distribution System Planning of the Electric Distribution System Planning of the Electric Companies - Resilience and Reliability Standards and Program](#). The Working Group works to establish programmatic improvements and emerging issues regarding utility vegetation management for the maintenance of distribution lines. The working group evaluates current practices and makes recommendations as needed for legislative, regulatory, or other improvements, and produces annual reports for PURA.

EOE serves as the facilitator of several Distributed Generation Working Groups (IXWGs). The working group members consist of solar developers, electric distribution companies, and various state agencies. Two interconnection working groups, a policy working group (PWG) and a technical working group (TWG), were approved and delegated to EOE by the Authority in the November 25, 2020 Decision in Docket No. 17-12-03RE06, [PURA Investigation into Distribution System Planning of the Electric Distribution Companies - Interconnection Standards and Practices](#). The two interconnection working groups are either referred to individually or collectively as the Interconnection Working Group or IX WG, which reflects that practical reality that the groups are administered together. These groups have implemented numerous changes over the past year to improve the process for the interconnection of distributed generation resources, such as solar photovoltaics (PV), to the electric distribution system, and have improved hosting capacity maps, updated interconnection guidelines, and created a public interconnection queue, among other accomplishments.

As such, in 2024, the EOE led the facilitation of the collective Interconnection Working Group (IX WG) with the support of a consultant, the Great Plains Institute (GPI). Key accomplishments include:

- **100-Day Sprint:** The group participated in a 100-Day Sprint in Docket No. 17-12-03RE06, PURA Investigation into Distribution System Planning of the Electric Distribution Companies –Interconnection Standards and Practices with the report due 12/21/24.
- **Environmental Justice Communities:** Required changes to the interconnection application were implemented to facilitate easier access for environmental justice communities to connect and utilize renewable energy, promoting equitable clean energy access.
- **Trough-Type Connection Safety:** Updated plans for interconnection involving trough-type connections with side-by-side meter installations were developed to address safety and tampering risks, particularly benefiting renewable energy projects at multi-family housing sites.
- **Meter Socket Adaptor (MSA) Integration:** A comprehensive report addressing MSA safety concerns led to their approval for interconnection use. This change significantly reduced the time and cost associated with interconnecting renewable energy projects.
- **Hosting Capacity Maps:** Proposals were advanced to update hosting capacity maps, enabling developers to identify optimal locations for successful renewable energy project development.
- **Interconnection Application Fee Updates:** Adjustments to interconnection fees were implemented to better align with costs while avoiding deterrence of renewable energy development.

Beyond these measurable projects, IXWG members consistently engaged in collaborative problem-solving, facilitated knowledge sharing through presentations, and hosted Q&A sessions to address stakeholder concerns. EOE's leadership in the IXWG exemplifies its commitment to improving regulatory frameworks, fostering stakeholder collaboration, and supporting the state's transition to a sustainable energy future.

EOE also serves as the facilitator for the Pole Attachment Working Group with members consisting of the SPAs, ILECS, 3rd party attachers, and other state and municipal stakeholders. This group is actively working on the Single Visit Transfer Pilot (SVT), established through Docket No. 21-07-29, Single Visit Transfer Process for Double Poles. This working group was established in Docket No. 19-01-52RE01, PURA investigation of Development in The Third Party Pole Attachment Process – Make Ready.

The working group was tasked in part with implementing the Single Visit Transfer Pilot program. During Phase 2, three contractors—Rocky Mountain, Riggs Distler, and Phoenix—completed the removal of 2,826 double poles across 13 municipalities. This critical work helped streamline infrastructure and improve service reliability in these areas.

As Phase 3 begins, in Eversource's service area, work will focus on Stamford, West Hartford, and Middletown, while in UI's territory, Trumbull and West Haven will be the initial focus. Unlike the previous phases, where all towns in a cohort were completed before moving forward, Phase 3 will adopt a rolling approach, adding municipalities as work progresses.

The double pole removals achieved during Phase 2 were substantial, with 1,332 poles removed in UI territory and 1,494 in Eversource territory. Breakdown by location is as follows:

UI Territory (1,332 poles removed):

- Easton: 84
- East Haven: 114
- New Haven: 275
- Hamden: 244
- Bridgeport: 283
- Fairfield: 214
- Milford: 118

Eversource Territory (1,494 poles removed):

- Branford: 65
- Waterbury: 225
- Winchester: 64
- Hartford: 419
- New Britain: 456
- Norwalk: 265

The transition into Phase 3 represents a continued commitment to improving infrastructure and operational efficiency across Connecticut.

# SECTION 9: LEGISLATIVE UPDATES

## Updates on 2024 Legislation

In 2024, multiple pieces of legislation were enacted directing PURA to participate in or complete a number of tasks by certain dates. The below table summarizes each of these bill’s requirement(s) of PURA, the progress made since their passage, and any next steps planned.

**Table 15: 2024 Legislation Relevant to PURA**

Act	Title	Tasks Assigned to PURA	Effective Date	Progress
<u>Public Act 24-38</u>	An Act Concerning Energy Procurements, Certain Energy Sources and Programs of the Public Utilities Regulatory Authority	PURA was added to a task force studying consumer protection for solar customers.	Effective from Passage	PURA has designated a staff member to serve on this task force.
<u>Public Act 24-31</u>	An Act Concerning Solar Projects Throughout the State	Requires PURA to study successor programs to NRES and SCEF. The study will include whether to extend the existing programs beyond their procurement years, potential processes to adopt to avoid stranded projects, potential successor programs, consideration of different criteria, procedures for choosing projects, and identification of alternative bidding frameworks.	Effective from Passage	PURA is preparing to launch a public study process.

Act	Title	Tasks Assigned to PURA	Effective Date	Progress
<u>Public Act 24-81</u>	An Act Concerning Allocations of Federal ARPA Funds and Provisions Related to General Government, Human Services, Education, and the Biennium Ending June 30, 2025	The act contains provisions for PURA to institute telecommunications relay services for deaf, deafblind, and hard of hearing persons.	July 1, 2024	In Docket 21-10-05, PURA approved Hamilton Telecommunications to handle telecommunications relay services (TRS) in Connecticut through June 30, 2027. In 2026, PURA will open a new docket to determine bids and select an appropriate TRS provider in Connecticut for July 1, 2027 – June 30, 2032.
<u>Public Act 24-151</u>	An Act Authorizing and Adjusting Bonds of the State and Concerning Provisions Related to State and Municipal Tax Administration, General Government and School Building Projects	The act indicates that PURA shall initiate a docket to develop a program encouraging the installation of solar and energy storage in schools.	July 1, 2024	PURA included this topic in Docket No. 24-08-03: <u>Annual Non-Residential Energy Solutions Program Review - Year 4</u> . Implementation is ongoing.
<u>Public Act 24-144</u>	An Act Concerning Certain Proceedings Relating to Electric Transmission Lines and the Membership and Processes of the Connecticut Siting Council	Section 12 requires DEEP, in consultation with PURA and several other government bodies, to prepare a report on the Connecticut Siting Council. The report will focus on the Council's ability to balance the Siting Council's mission with "the need to protect the environment, public health and safety."	Effective from Passage	PURA designated a staff member to participate in this study.



## PURA Annual Reports to the General Assembly

Over the years, the State legislature has tasked PURA with providing annual reports to the General Assembly on various topics. Links to the final reports for 2024 are available in Table 12 below.

**Table 16: 2024 PURA Reports to the State Legislature**

Report Title	Codifying Act	Docket Number	Submission Date	Due Date
2024 PURA Report to the General Assembly Regarding the Electric Efficiency Partners Program	Public Act 07-242	<a href="#">24-02-02</a>	2/15/2024	2/15/2024
2024 PURA Report to the General Assembly Concerning Lost and Unaccounted for Gas	Public Act 14-152	<a href="#">24-03-02</a>	7/1/2024	7/1/2024
2024 PURA Report to the General Assembly on Electric Distribution Company System Reliability	Public Act 98-28	<a href="#">24-08-09</a>	8/19/2024	9/1/2024
PURA Investigation into Distribution System Planning of the Electric Distribution Companies – Building Blocks of Resource Adequacy and Clean Electric Supply: Legislative Report	Public Act 23-102	<a href="#">17-12-03RE10</a>	2/1/2024	2/1/2024
2024 PURA Review of and Report on Connecticut Public Service Company Emergency Response Plans	General Statutes § 16-32e	<a href="#">24-02-03</a>	8/30/2024	10/1/2024
2023 PURA Report to the General Assembly Regarding the State of Electric Competition	General Statutes §§ 16-245x(a), 16-245y(c)	<a href="#">23-11-01</a>	4/1/2024	4/1/2024

# SECTION 10: STATUS OF DECISIONS IN APPEAL

## The Decision Appeal Process

All Authority decisions are based upon robust evidence gathered through the public docket process, which includes discovery, hearings, written and verbal comments, testimony, interrogatories, and more. Authority staff with technical expertise in finance, accounting, engineering, economics, policy, and law are assigned to each docket to ensure that the record of that docket is substantial and sufficient to issue sound decisions.

If a party to a PURA docket disagrees with a decision of the Authority, the party may file an administrative appeal with the Superior Court.

In 2024, about 19 of PURA’s decisions were in some stage of an appellate process, 16 of which are from Avangrid, Eversource, or a subsidiary. The table below summarizes the pending and resolved appeals from 2021-2024. Due to the Authority’s vigorous public process, active stakeholder participation, and the commissioners’ equitable balancing of various interests, the Authority has a strong record of having Courts dismiss these administrative appeals or affirm the Authority’s decision. In some cases, the court may require the Authority to provide further articulation or clarification of a decision.

## PURA Decisions in Appeal

The below table provides a status update of PURA's decisions that were in some stage of an appellate process in 2024.

**Table 17: Status of PURA Decisions in Appeal during 2024**

Appellant	Docket No.	Summary	Status
Direct Energy Services, LLC et al.	16-12-29 SC 20643	Certain electric suppliers appealed a 2020 PURA decision that imposes restrictions on the Voluntary Renewable Offers (VRO) market to minimize customer confusion and to align the VRO program with the state's energy and environmental goals.	The Superior Court affirmed PURA on all counts.  The CT Supreme Court affirmed the Superior Court.
Northland Investment Corporation	19-12-25 SC 20769	Northland challenged PURA's determination that ratio utility billing methodology (RUB) is not permitted under state law.	The Superior Court affirmed PURA's determination.  The Supreme Court affirmed.
Retail Energy Advancement League (REAL, assoc. of retail electric suppliers)	18-06-02RE01 CV23-6077829	REAL appealed motion ruling declining to strike evidence.	REAL withdrew the appeal.
Retail Energy Advancement League (REAL, assoc. of retail electric suppliers)	18-06-02re02 CV23-6082579	REAL is seeking a declaratory judgment relating to provisions of Senate Bill 7 and PURA's pending Docket No. 18-06-02re02.	Superior Court dismissed the appeal.
Yankee Gas (Eversource)	21-08-24 CV22-6073770	Eversource appealed a 2022 PURA decision ordering LDCs to apply surplus non-firm margin (NFM) revenues to capital infrastructure investments at their next rate case.	After full briefing, Eversource withdrew the appeal.

Appellant	Docket No.	Summary	Status
CL&P (Eversource)	21-01-03 CV21-6069473	Eversource appealed a 2021 Rate Adjustment Mechanism (RAM) decision in which PURA disallowed \$17.2M of catastrophic storm costs in the Electric System Improvement (ESI) tracker. Eversource also challenged the interest rate applicable to carrying charges.	The Superior Court affirmed PURA on the storm cost issue and remanded the interest rate matter for clarification by PURA. PURA issued a clarification decision, and the matter is pending before the Superior Court. Eversource and the Authority reached a settlement in principle to resolve the carrying charge portion of this case.
CL&P (Eversource)	21-01-03 CV23-6078865	See CV21-6069473 above. Eversource separately appealed the clarification decision issued on remand by PURA.	Pending in Superior Court. The settlement reached in the above proceeding will resolve this appeal.
CL&P (Eversource)	22-09-08 CV23-6078868	See two appeals above. PURA identified a transcription error in a decision that consolidated existing PURA orders related to RAM proceedings. PURA issued an errata decision correcting the error. Eversource appealed the correction.	Pending in Superior Court. The settlement reached in the above proceeding will resolve this appeal.
CL&P (Eversource)	21-01-03 AC 45899	Eversource appealed the Superior Court's affirmation of PURA's 2021 RAM decision as to storm costs.	The Appeals Court dismissed the appeal for lack of jurisdiction pending resolution of the appeal at Superior Court.
CL&P (Eversource)	23-01-39 CV23-6081727	Eversource appealed a decision resulting from PURA's investigation into Eversource's response (exceeding 1 hour) to an entrapment incident involving injured persons in Norfolk. PURA directed Eversource to reduce its target response time to 30 minutes for "blue-sky" conditions and to improve its accident reporting.	Superior Court dismissed the appeal. Eversource has appealed the dismissal.

Appellant	Docket No.	Summary	Status
CL&P (Eversource)	23-01-39 CV24-6083548	In addition to the direct appeal of the entrapment investigation, Eversource also filed a request for a declaratory judgment challenging the entrapment investigation (see above).	Duplicative action by Eversource. Pending resolution of Eversource's appeal of the Superior Court dismissal.
CL&P (Eversource)	23-01-32 CV24-6083754	Eversource appealed a decision resulting from PURA's investigation into a series of explosions and fires in Eversource's underground facilities.	Pending in Superior Court. Briefing scheduled.
Aquarion (Eversource)	22-07-01 CV23-6078177	Eversource appealed the 2023 rate case decision denying a \$35M rate increase. Eversource is challenging approx. \$15M in disallowances.	Superior Court affirmed PURA's decision with respect to the majority of the counts and remanded 3 counts back to PURA for further explanation. Eversource appealed the court's affirmation. The appeal is pending with the Supreme Court (21010).
Aquarion (Eversource)	22-07-01 CV24-6089616	PURA issued a supplemental decision with respect to the 3 counts remanded back to PURA in the rate case appeal. Eversource appealed.	Pending before Superior Court. Briefing is scheduled.
United Illuminating (UI)	24-01-04 CV24-6089978	UI appealed the 2024 RAM decision.	Pending resolution of UI's appeal of the 2022 RAM decision.
United Illuminating (UI)	23-01-04 CV24-6083218	UI appealed the 2023 RAM decision.	Pending resolution of UI's appeal of the 2022 RAM decision.
United Illuminating (UI)	22-01-04 CV22-6075751	UI appealed the 2022 RAM decision,	Court remanded the matter back to PURA for explanation. PURA issued a proposed final decision in January 2025. UI filed written exceptions. Final decision to be issued late January or early February.

Appellant	Docket No.	Summary	Status
United Illuminating (UI)	22-08-08 CV23-6081616 CV23-6082032	UI appealed the 2023 rate case decision granting a \$22M increase.	Briefing completed in Fall 2024. A decision from the Superior Court is pending.
United Illuminating (UI)	22-08-08 CV24-6084344	UI appealed the Authority's decision to not grant an interim rate increase	After briefing, UI withdrew the appeal.
United Illuminating (UI)	20-08-03 and 20-08-03RE01 SC 20795 CV21- 6067807SCV21 -6066639S	After finding UI's storm response was deficient in several areas, PURA imposed a civil penalty of \$1.3M for non-compliance with performance standards and accident reporting requirements and ordered a 15 basis point ROE reduction penalty in UI's next rate case to incentivize improved storm response performance by UI. In the subsequent rate case, PURA determined that the 15 basis point reduction was no longer warranted.	Superior Court affirmed PURA's decision on all counts. UI appealed the affirmation. The Supreme Court affirmed the \$1.2M civil penalty related to performance, found the ROE issue to be moot, and required PURA to recalculate the \$61k civil penalty for accident reporting.
GenConn Energy LLC (a joint venture between UI and NRG Energy, Inc.)	20-06-14 21-06-28 22-06-02 23-06-02 CV21-6064030 CV22-6070555 CV23-6077103 CV24-6083506 SC 20716	GenConn has appealed the decisions issued in these annual rate proceedings for 2021 to 2024. The primary issue on appeal is GenConn's cost of capital.	The Superior Court affirmed PURA's decision for 2021 on all counts. The Supreme Court affirmed. The appeals for 2022 to 2024 are pending.
Vistra Corp. et al.	23-06-01 CV24-6083505	Several electric suppliers that had previously entered into a settlement agreement to resolve a PURA investigation appealed this decision, which requires the suppliers to pay their actual Renewable Portfolio Standard (RPS) obligations, rather than have these costs shift to ratepayers.	Superior court dismissed the appeal. Vistra filed an appeal to the Appellate Court.

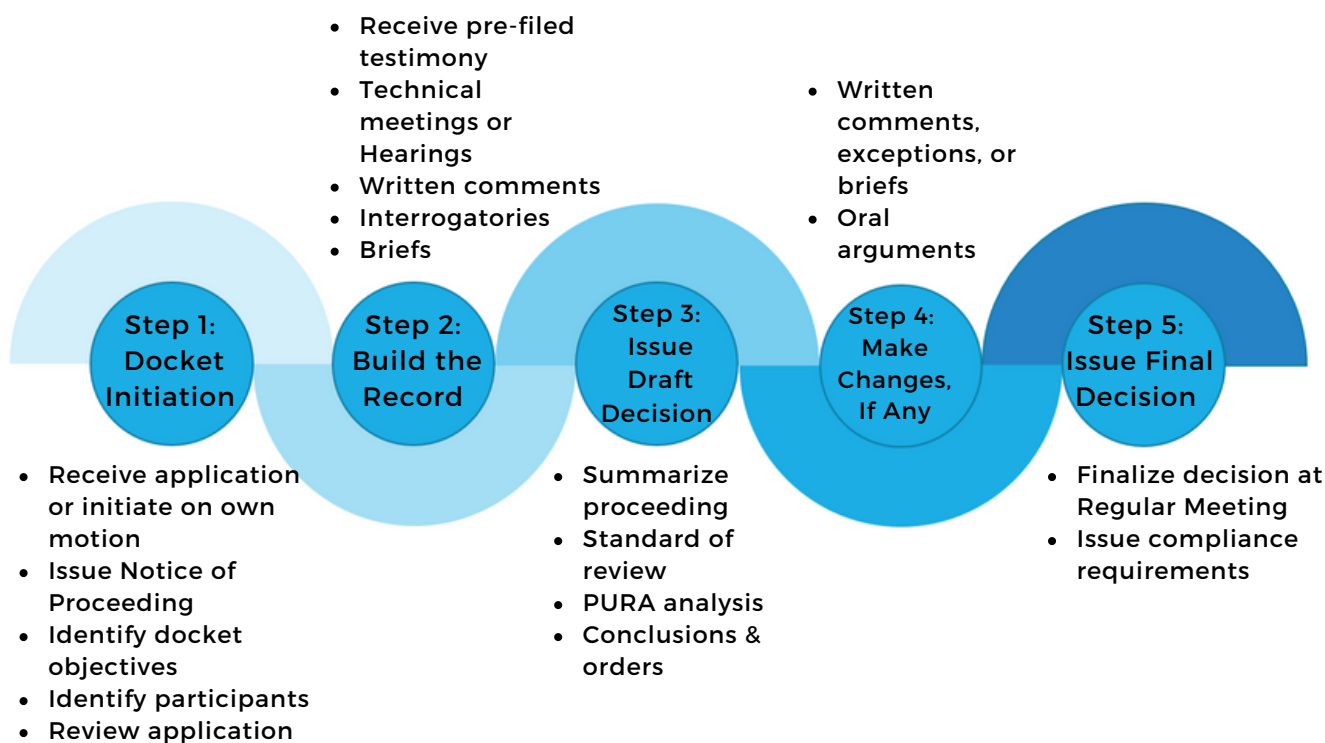
Appellant	Docket No.	Summary	Status
Sunnova Energy Corp.	22-10-05 CV23-6078852	Sunnova appealed PURA's determination regarding the transfer of RECs under the RRES program.	Superior court dismissed the appeal.
Clearview Electric, Inc.	07-08-17 CV23-6082224	Clearview appealed PURA's denial of Clearview's request to withdraw its electric supplier license until Clearview pays the amount it owes under the supplier cost allocation decision (14-07-19re07).	Superior court dismissed the appeal. Clearview filed an appeal to the Appellate Court.
Communications Workers of America, Local 1298	24-05-11 CV25-6091597	CWA petitions and appeals from PURA's Final Decision dated October 23, 2024, related to decisions issued by the Authority and actions taken by the working group to address double-poles.	Pending in Superior Court.



# APPENDIX 1: STANDARD DOCKET PROCEDURE GUIDE

The Public Utilities Regulatory Authority (PURA or the Authority) is a quasi-judicial state agency, which means that, similar to a court, all matters before PURA must go through a standardized procedural process, also known as a “docket”. Though each docket is unique, nearly all follow a five-step framework outlined by Figure A1. A more detailed description of each step is provided below.

**Figure A1: The Standard PURA Docket Process**



## Step 1: Docket Initiation

Dockets are initiated for a variety of matters in response to external stakeholder petitions or applications. The Authority may also initiate dockets of its own accord, either on a voluntary basis or as required by law. External stakeholders file their application through [PURA's online docket system](#). Upon receipt of an application, PURA's Docket Control staff will assign the application a docket number and title.

The Authority will then issue, through the docket, a **Notice of Proceeding (NOP)**, which is a legal document that reflects the type (i.e., contested or uncontested) and scope of the proceeding. The NOP is also an important communication device, used by the Authority to set appropriate stakeholder expectations for the proceeding. This includes citing to relevant statutes, providing an initial list of docket participants, and outlining potential areas of exploration or investigation.

At the same time as the NOP is distributed, or shortly thereafter, PURA will also publish an **external docket schedule** whenever possible, particularly if the docket is governed by a statutory timeline. The external schedule is used to communicate the planned procedural steps in a docket, to facilitate the PURA discovery and decision drafting process, and to make sure that external procedural steps do not conflict with other scheduled events.

At this point, any docket participant in an uncontested case or a party or intervenor in a contested case may submit **docket correspondence**. Correspondence provides a stakeholder's perspective outside of the procedural steps identified in the external schedule. Correspondence need not be as structured as the other forms of comments or testimony discussed. The Authority gives docket correspondence its due weight based on the nature of the comments provided, and the evidence presented. The Authority may use correspondence to help guide the discovery process in Step 2: Build the Record.

## Step 2: Build the Record

In order for the Authority to issue a decision, it must have a robust record of evidence that supports it. During Step 2, PURA establishes this record evidence through discovery. Discovery entails a variety of tools and events that allow the Authority to investigate the components of the issue(s) in the proceeding. These include:

- **Pre-Filed Testimony:** Pre-filed testimony provides participants, parties and/or intervenors an opportunity to introduce expert witnesses and to present their main position at the outset of the proceeding.
- **Written Comments:** Written comments allow participants, parties, and/or intervenors, and other stakeholders, the opportunity to share their support, concerns, and thoughts regarding the docket. A Request for Written Comments will be separately noticed by PURA and will specify the topics for comment.
- **Interrogatories:** Interrogatories are questions the Authority issues to specific participants, parties, and/or intervenors. These questions are based on the Authority's review of written comments, testimony, or other filed evidence. Interrogatories may also be propounded by other participants, parties, and/or intervenors, as governed by

the Notice of Proceeding and any associated rulings on a request for status as a participant, party or intervenor.

- **Hearings & Late Filed Exhibits:** Hearings allow the Authority to question the participants, parties, and intervenors, as well as their expert witnesses. Exhibits are entered into the evidentiary record during the Hearing for use in the Decision. Answers submitted at a later date to questions asked during cross examination are considered Late Filed Exhibits. The Authority may seek additional explanation or clarity on Late Filed Exhibits during a Late Filed Exhibit Hearing.
- **Technical Meetings:** Technical Meetings are informational meetings that allow the Authority to question the participants while also providing the opportunity for the participants to discuss issues with the Authority. Technical Meetings may be held in addition to, or in lieu of, a formal hearing, depending on the type of docket under consideration.
- **Briefs:** Following the conclusion of the final hearing and/or close of the formal record, the Authority may issue briefing prompts for parties and participants to submit final arguments into the record. The Authority may also issue briefs at other times in the proceeding prior to the close of the evidentiary record to better ascertain the legal or other positions of participants, parties, and/or intervenors. Briefs are not an opportunity to enter new evidence into the record.

The Authority may employ one, many, or all of these tools, and may use them more than once throughout a proceeding. Contested proceedings are guided by the Uniform Administrative Procedure Act and Title 16 of the Regulations of Connecticut State Agencies, and often involve a hearing. Any of these tools that are relied on by the Authority will be listed in the external docket schedule for a proceeding.

### Step 3: Issue the Proposed Final Decision

**Decisions** are authoritative rulings or determinations made by the Authority through its adjudicatory powers over certain matters, as dictated and delegated by state statute. A Decision is written based on evidence entered into the evidentiary record. In most dockets, the Authority may elect to issue a **Proposed Final Decision**. Virtually all of PURA's decisions follow a standardized outline and inventory of information that includes:

- A summary of the decision;
- Background and conduct of the proceeding;
- A list of the parties, intervenors, and/or participants;

A list of relevant statutes, regulations, case law, or PURA precedent that governs the application and PURA's review;

- A summary of the standard of review, including specific findings or conclusions made by PURA;
- A description of the burden of proof, or other statutory limits;
- The Authority's analysis of the proceeding, organized by each subtopic, which may include a synopsis of stakeholder comments in general or by subtopic;
- Conclusions;
- Orders that direct subsequent action related to the topic from specific parties; and
- Any appendices.

## Step 4: Revise the Proposed Final Decision (Optional)

Proposed Final Decisions are published for stakeholders to review, along with a Notice for Written Exceptions. Exceptions are provided by stakeholders that disagree with or take issue with specific components of a Proposed Final Decision, and must be structured to identify errors of fact or errors of law; importantly, written exceptions cannot introduce or rely on evidence not already in the official record. Parties, intervenors, and/or participants to the docket are provided the opportunity to file exceptions to portions of the Proposed Final Decision. Additionally, the Notice for Written Exceptions may, but is not required to, offer parties and participants the opportunity to request that the Authority hold **Oral Arguments** so that they may present their argument directly before the Authority. The Proposed Final Decision may be revised as a result of Written Exceptions and/or Oral Arguments.

## Step 5: Issue the Final Decision

Following any changes made in response to Written Exceptions and Oral Arguments, PURA staff will present a Final Decision before a panel of the three Commissioners at a **Regular or Special Meeting**. The PURA Commissioners hold a Regular Meeting most Wednesdays at 10:00a.m. to vote on the adoption of Final Decisions. A Decision is not considered final until it is placed on a Regular or Special Meeting agenda and receives a vote of adoption by a majority of the Commissioners. All Regular and Special Meeting agendas are published on the Secretary of the State's Connecticut State Agency Public Meeting Calendar on the Thursday prior to the Regular Meeting, as well as on [PURA's Calendar of Events](#).