

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

Due to PURA's quasi-judicial structure, there are limitations on the communications PURA staff may have with stakeholders and members of the public, particularly during active proceedings. These rules, referred to as a prohibition on "ex parte communications," prevent any individual participant from gaining an unfair advantage in terms of additional knowledge over other participants in a docket. However, many of the dockets before PURA, and even the docket process itself, are complex and sometimes challenging to navigate, particularly for stakeholders that do not often engage in Authority proceedings. Additionally, there are certain topics before the Authority that would benefit from less formal engagement structures such as working groups or are more routine in nature and could be processed more efficiently.

Recognizing these needs, PURA established the Office of Education, Outreach, and Enforcement (EOE) in July of 2020. The key objective of EOE is to provide ratepayers and non-traditional stakeholders that interact with PURA an improved customer service experience. The "ex parte" rules that apply to PURA's decisional staff do not apply to staff assigned to EOE, meaning ratepayers and other parties may pose questions and concerns to EOE staff. Importantly, however, EOE staff are not able to discuss active substantive matters with PURA's decisional staff and commissioners, nor are EOE staff permitted to speak on behalf of the Authority.

EOE Organization

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

Licensing and Certification Unit

The Licensing & Certification Unit is responsible for analyzing and processing routine licensing and certification matters filed with PURA under the Authority's jurisdiction and oversees reporting and other administrative matters related to the State and utility stakeholders.

In 2023, staff reviewed nearly 18,000 licenses and certifications statewide, including but not limited to electric and water submetering applications, renewable generator certification (Class I), and electric supplier licensing applications and natural gas seller registrations:

- 17,614 Class I Renewable Energy Certifications
- 6 Electric Submetering Applications
- 10 Water Submetering Applications
- 21 Natural Gas Seller Registrations
- 29 Wireless Facilities Within the Public Rights-of-Way (1 closed without approval) Applications
- 30 Installation of Wireline Facilities Under and Over the Public Rights-of-Way Applications
- 2 Telcom Certificates of Public Convenience and Necessity
- 5 Electric Supplier License Application
- 119 Electric Aggregator Certifications

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 2023, EOE staff also supported thousands of customers in how to access the Rate Board, explain utility standard service pricing, view alternate generation offers, and understand the enrollment process specific to their needs.

Mediation & Enforcement

The Mediation & Enforcement Unit mediates disputes concerning matters related to regulated companies whenever possible or appropriate, enforces applicable regulations and statutes in matters delegated to EOE, and independently investigates issues related to PURA-regulated or licensed entities as directed or delegated. Consistent with the objectives of the Authority and EOE, this unit dedicated significant focus to vulnerable and low-income customers (hardship) in 2023.

Over the past year, the Mediation and Enforcement unit monitored the activities of electric suppliers in Connecticut and initiated investigations regarding the customer service practices of suppliers to determine whether they are in compliance with state statutes, state regulations, and PURA's orders.

As part of this work, EOE settled two supplier enforcement actions, amounting to over \$2 million in settlement and customer restitution. The Authority directed the entirety of these settlement amounts to be used as a donation to reduce EDC hardship customer arrearages. Table 15 summarizes EOE's settlements through 2023.

Table 15: 2022 EOE-Facilitated Settlements

Entity	Settlement/ Restitution	Docket No.	Docket Title
Xoom Energy Connecticut LLC	\$1,624,725	11-06-05	Application of Xoom Energy CT LLC for an Electric Supplier License
Town Square Energy, LLC	\$450,000	10-03-11RE01	Application of Community Power & Utility, LLC for an Electric Supplier License - Transfer of License to Town Square Energy, LLC

As part of continued efforts to monitor supplier actions, in 2023, EOE:

- Streamlined and provided inputs to the Annual Renewable Portfolio Standards (RPS) program, among other efforts, through Docket No. 23-06-01, Annual Review of Connecticut's Electric Suppliers' and Electric Distribution Companies' Compliance with Connecticut's Renewable Energy Portfolio Standards in the Year 2022.
- Drafted the report to the legislature on suppliers and supplier licensing applications for 2023 in Docket No. 22-11-01, Annual Report to the Legislature - The State of Electric Competition, and began work on the next report in Docket No. 23-11-01, 2023 PURA Report to the General Assembly Regarding the State of Electric Competition. This report summarizes the state of electric competition by analyzing a variety of indicators, including the average generation service charge and the Standard Service generation rates for residential and business customers, to show the market's impact on customers who participate in the third party electric supplier market.

EOE also participated in several dockets in 2023 focused on helping vulnerable and low-income customers reduce outstanding arrearages. These efforts include but are not limited to 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. 23-05-01, Annual Review of Affordability Programs and Offerings, and 18-06-02RE01, Two Year Review Required Pursuant to Conn. Gen. Stat § 16-245 O(M). This work included 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.

Efforts to support customer education and experience included support for the implementation of utility bill redesign via Docket No. 14-07-19RE06, [PURA Investigation into Redesign of the Residential Electrical Billing Format – Five Year Review](#), and Docket No. 14-07-19RE07, [PURA Investigation into Redesign of the Residential Electrical Billing Format – Cost Allocation Among Suppliers for System Redesign and Associated Costs](#). In these dockets, EOE supported efforts to provide greater transparency and accessibility of billing information for customers.

EOE facilitated the work product provided in Docket No. 22-10-12, [PURA Proceeding to Investigate Alternative Risk Transfer Programs](#). As part of the docket, EOE worked with the Connecticut Insurance Department (CID) and Connecticut's electric distribution companies (EDCs) to explore, analyze, and advance a risk transfer advisory study, captive insurance feasibility study, and the analysis of government backstop mechanism. As part of the State of Connecticut's ongoing risk management strategy, PURA directed the investigation into the value/cost efficiencies and viability of using a captive insurance company (captive) to provide alternative risk financing for certain Transmission and Distribution (T&D) exposures and vulnerabilities faced by EDCs under its regulatory supervision. This docket originated with Order No. 11 of the Final Decision dated August 31, 2022, in Docket No. 17-1203RE08, [PURA Investigation into Distribution System Planning of the Electric Distribution Companies – Resilience and Reliability Standards and Programs](#), pursuant to a recommendation by several state agencies made in Docket No. 20-08-03, [Investigation into Electric Distribution Companies' Preparation for and Response to Tropical Storm Isaias](#). It was also related to PURA's final decision in Docket No. 20-08-03 regarding the performance of Eversource and UI in preparing for, and responding to, Tropical Storm Isaias, in which the EDCs were directed to explore the potential for obtaining storm-related insurance policies aimed at reducing the post-disaster financial impact to customers.

EOE also supported the Aquarion and United Illuminating rate cases (Docket No. 22-07-01 and Docket No. 22-08-08, respectively). EOE also supported efforts in the Connecticut Water Company (Docket No. 23-08-01) and SCG and CNG (combined Docket No. 23-11-02) rate cases with a focus on customer service, engagement, and return on equity.

Education & Outreach

The Education & Outreach Unit (also referred to as Consumer Affairs) receives complaints and inquiries from Connecticut utility ratepayers and works to provide resolution and relevant educational resources to assist the complainant. This unit also produces, distributes, and presents educational materials about Connecticut's utilities and their regulation through public forums.

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
- [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 2023, the Education & Outreach Unit responded to nearly 17,000 complaints and inquiries. As a result of complaint resolution, EOE was able to secure the return of over \$164,000 to customers, demonstrated by Tables 15 and 16 below:

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- Billing
 - General Complaint/Quality of Interaction
 - **PURA Utility Complaint Scorecard Data Types**
 - Installation
 - Meter Test
 - Outage
 - Payment Arrangement
 - Quality of Service
 - Deposit
 - Slamming
 - Termination

Table 15: 2023 Customer Complaints and Inquiries by Industry

Industry Type	Quantity
Community Antenna Television	4,940
Electric	3,457
Natural Gas	1,101
General Info	4,307
Suppliers/Electric Aggregators	1,880
Telephone	859
Telephone Other	132
Video Service Provider	73
Water	220
TOTAL	16,969

Table 16: 2023 Customer Complaint Resolution Amount by Industry

Industry Type	Amount
Community Antenna Television	\$18,860.67
Cellphone	\$6,793.60
Electric	\$20,648.97
Natural Gas	\$42,055.11
Electric Supplier	\$47,531.05
Telephone/Local	\$10,903.35
Telephone/Other/CLEC	\$2,852.48
Video Service Provider	\$2,208.43
Water	\$12,214.60
Total	\$164,068.26

Working Groups

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, as well as 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 further participated in a newly-formed working group mandated in Docket No. 22-03-16RE02, Petition of the Office of the Consumer Council for and Investigation into the United Illuminating Company and Eversource Energy Regarding Collections Practices During the COVID-19 Moratorium – Wage Garnishment Working Group and related Matters. The working group is looking to review the practice and impact of wage

garnishment on customers for the purpose of reducing uncollectible and outstanding debts.

EOE 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. This 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 also serves as the facilitator of several Distributed Generation Working Groups. The working group members consist of solar developers, electric distribution companies, and various state agencies. 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.

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. The working group was tasked with implementing the Single Visit Transfer Pilot program. Currently, the Working Group is discussing open issues with the current phase of the program.