

## 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.