



STATE OF CONNECTICUT

PUBLIC UTILITIES REGULATORY AUTHORITY

APPLICATION TO CHANGE AN APPROVED ELECTRIC SUBMETERING SYSTEM

WHEN TO USE THIS CHANGE APPLICATION:

This Application to Change an Approved Electric Submetering System (Change Application) is to be used in limited circumstances only by Applicants whose Application to install and use an electric submetering system was previously approved by the Public Utilities Regulatory Authority (Authority) in a prior docket. In order to use this Change Application, the proposed change must regard **a Facility that was previously approved** and can be used only when the following are being proposed:

1. Change of **owner or landlord**, and/or
2. Change of **vendor**, and/or
3. Change of **fee(s)**.

If any or all of these changes are being proposed for approval **at the same Facility** that was previously approved for installation and use of an electric submetering system, use this Change Application, which is for approved electric submetering with and without Class I renewable energy or Class III CHP sources onsite.

For purposes of this Change Application, "Facility" means the multi-unit facility at which the submetering system is installed and operated. In order for the Facility to be deemed the "same Facility that was previously approved," the Facility must not have changed in any way from the manner in which the Facility was previously approved in the initial *Application for Approval to Install and Use an Electric Submetering System*.

WHEN NOT TO USE THIS CHANGE APPLICATION:

If any other changes or additions are being proposed – other than change of owner/landlord, vendor, or fee(s) – you must submit a complete *Application for Approval to Install and Use an Electric Submetering System* found on the Authority's website at <https://portal.ct.gov/PURA/About/Filing-and-Forms/PURA-Forms>.

DO NOT USE THIS CHANGE APPLICATION if any of the following are being proposed: additional buildings; additional, new, or different submeters; or changes to how or when submeters will be read. If any of these changes or additions are being proposed, submit a completed *Application for Approval to Install and Use an Electric Submetering System*.

HOW TO FILE THIS CHANGE APPLICATION:

This Change Application should be filed with the Authority as an attachment to a Motion to Reopen in **the docket in which the original Application was approved.**

NOTE REGARDING THE FORMAT OF NUMBERS IN THIS CHANGE APPLICATION:

The section numbers of this Change Application are the same as the section numbers in the *Application for Approval to Install and Use an Electric Submetering System, version January 2026*. This allows Authority Staff as well as Applicants to better compare the original Application with the proposed changes. Any gaps in numbering are intentional.

APPLICANT CONFIRMATIONS & DOCKET INFORMATION:

Applicant is proposing changes to (check all that apply):

- Owner and/or Landlord;
- Vendor; and/or
- Fee(s).

Docket in which the Facility was first approved to install and use an electric submetering system:

Docket No. _____

- By checking this box, Applicant confirms they have, to the best of their knowledge, provided the correct Docket Number above.
- By checking this box, Applicant confirms they will complete and submit the Affidavit on page 16 of this Change Application.

A. APPLICANT INFORMATION

The term "Applicant" refers to the landlord or owner of the property at which the electric submetering system is installed. The Applicant is the responsible party for all aspects of the submetering installation, operations, consumer protections, and any Vendor hired to process billing, notices, and/or other documentation. Please review the Instructions for filling out and submitting this Change Application, found on the Authority's website at <https://portal.ct.gov/PURA/About/Filing-and-Forms/PURA-Forms>. The Instructions are posted on the Public Utilities Regulatory Authority's (Authority) website with this Change Application.

Applicants have an ongoing obligation to amend and/or supplement the information contained in this Change Application, including a change of Vendor and any changes to Applicant or Vendor procedures or policies as previously approved. See the *Application for Approval to Install and Use an Electric Submetering System* and instructions thereto for full details found on the Authority's website at <https://portal.ct.gov/PURA/About/Filing-and-Forms/PURA-Forms>.

(A-1a) Original (or Current if different from Original) Applicant:

Name: _____
Address: _____
City: _____ Telephone: _____
Web site (if any): _____

Contact person/designated representative for service for this Change Application:

Name: _____ Title: _____
Address: _____
City: _____ Main Telephone: _____
Telephone: _____ Fax: _____
E-Mail Address: _____

Original/Current Applicant is the:

- landlord
- owner
- other (please explain: _____)

The Application to Change Owner or Landlord continues on page 3.

The Application to Change Vendor continues on page 9.

The Application to Change Fees continues on page 16.

The Affidavit required for all changes appears on page 17.

APPLICATION TO CHANGE OWNER OR LANDLORD

(A-1b) New Applicant:

Name: _____
Address: _____
City: _____ Telephone: _____
Web site (if any): _____

Contact person/designated representative for service for this Change Application:

Name: _____ Title: _____
Address: _____
City: _____ Main Telephone: _____
Telephone: _____ Fax: _____
E-Mail Address: _____

New Applicant is/will be the: landlord
 owner
 other (please explain: _____)

(A-2) If New Applicant has office(s) in Connecticut, provide the following information regarding New Applicant's principal Connecticut office:

Address: _____
City: _____ Main Telephone: _____
Telephone: _____ Fax: _____

(A-3) New Applicant's Federal Employer Identification Number (FEIN): _____

(A-4) New Applicant's Connecticut Tax Identification Number: _____

(A-5) New Applicant's legal form of ownership:

- Corporation
- LLC
- Cooperative
- If not the owner, attach owner's authorization to apply for submetering.
- Other: _____ (please specify)

(A-6) New Applicant was formed or organized on _____ in _____, _____.

As used in this Change Application, the term "submetering customer" means the Applicant, and the term "submetered party" refers to the persons, such as tenants, who are or will be receiving submetered electricity.

(A-14) Is the New Applicant currently under investigation, or has the New Applicant ever been fined, sanctioned or penalized, in any state for violation of any consumer protection law or regulation?

- Yes If yes, provide **Exhibit A-10: "Violation of Consumer Protection Law."** For each current investigation, provide all of the following: name of the state and agency conducting the investigation; date on which investigation began; description of the alleged violation; and status of the investigation. For each fine, sanction, or penalty, provide all of the following: date of the fine, sanction or penalty; name of state and agency imposing the fine, sanction, or penalty; description of the violation; description of the fine, sanction, or penalty, including monetary amounts, if applicable; and copy of the order imposing the fine, sanction, or penalty.
- No

For purposes of the remaining sections of this Change Application, the term “Applicant” is meant to include a Vendor where and as applicable.

“Submeter” is defined as a non-EDC electric meter located behind an EDC meter, used to measure the electric consumption of kWh by an individual end-use submetered party, such as a tenant.

Where necessary, the response to the questions in the remainder of this Change Application may be submitted on attached sheets, provided that each response is clearly labeled and pages sequentially numbered.

B. REPORTING REQUIREMENTS AND PERFORMANCE STANDARDS

(B-11) Annual Performance Standards for Traditional and Class I/III Source Systems

- a. For traditional (i.e. without Class I/III source) systems: On or before March 1st of each year, Applicant must file the annual compliance form detailing usage. The compliance form is provided as [Appendix C to the Authority’s Final Decision in Docket No. 13-01-26RE01](#) and must be filed as correspondence in the docket in which this Application is approved.
- b. For Class I/III source systems: Applicant must show that the source system meets the applicable Performance Standards (as described in Section V of the Instructions for this Application, found on the Authority’s website at <https://portal.ct.gov/PURA/About/Filing-and-Forms/PURA-Forms>). For the first 12 months following the date of approval by the Authority of this Application, compliance forms must be filed every 90 days, showing that the system meets the Performance Standards and explaining the circumstances surrounding any failure to meet the Performance Standards during the preceding reporting period. After 12 months, compliance forms must be filed annually on or before March 1st of each year detailing usage and production data. The compliance form is provided as [Appendix C to the Authority’s Final Decision in Docket No. 13-01-26RE01](#) and must be filed as correspondence in the docket in which this Application is approved.
- c. All Applicants acknowledge that the Authority can take enforcement actions, including revocation of the approval to submeter, for failure to meet the compliance obligations and performance standards.

Acknowledge: Yes

C. GENERAL COMPLIANCE WITH RULES AND REQUIREMENTS

(C-1) Submetering Rules and Regulations (EDC, supplier, billing, meter reading):

- a. Provide the name of the electric distribution company (EDC) providing distribution services to the Facility, the name of the entity(ies) supplying electricity generation services to the Facility, and the name of the entity(ies) that bill(s) the Applicant for that generation.
- b. State when Applicant will read submeters in relation to the EDC meter read date.
 - (i) Traditional submetering customers are required to read submeters on the same day as the EDC master meter(s). If submeters are read manually, they must be read within one day of the EDC master meter(s) read.

For traditional submetering Applicants, acknowledge compliance with the above meter reading requirements: Yes, and provide the date submeters will be read.

- (ii) Submetering with Class I/III source systems (also known as DG submetering): Because of possible billing cycle rate change issues as described in [Docket No. 13-01-26RE01](#),

submetering customers using Class I/III source systems may conduct meter readings on the first day of each month if needed.

For Applicants submetering with Class I/III source systems, acknowledge compliance with the above meter reading requirements: Yes, and provide the date submeters will be read.

- c. If Applicant cannot adhere to the applicable meter reading rules, explain why and how Applicant proposes to read submeters with a method that meets the intent of the standards outlined for meter reading in Authority decisions and Regulations.
- d. Confirm that the submetered parties will be billed only on a monthly basis. Yes

(C-2) Submetering Rules and Regulations (policies and procedures): For responses **in this Section C-2**, if none of the requested information or documentation has changed since the Applicant's approval to submeter was granted **in this docket**, Applicant may specifically refer to prior responses and exhibits filed **in this docket** or may submit the same responses and exhibits attached to this Change Application.

- a. Describe the Applicant's procedures with respect to submetered party inquiries concerning the submetering system; the operation of the submetering system; reading of submeters; labeling, marking, and mounting of submeters; access to submeters; and bills sent to the submetered parties for payment. Provide as **Exhibit C-2a** a copy of these procedures.
- b. Describe in detail the Applicant's method and frequency for non-standard billings for move-ins, move-outs, and prorating bills for a submetered party.
- c. Provide as **Exhibit C-2c** all documents provided to the submetered party describing the submetered party's rights and the procedures regarding submetered party inquiries about the submetering system, availability of the Applicant's utility billing statements and/or tariffs, the operation of the submetering system, reading of submeters, meter testing, and submetered party billing for electric service.
- d. If Applicant is submetering with a Class I or Class III source system: Provide as **Exhibit C-2d** a copy of the relevant utility customer class rate charged for the service territory in which the Facility is located (the "Rate"). Note that Rate comprises **only** the aggregate of (i) the default general service charge, standard service, or last-resort service, as applicable at the Facility, and (ii) the respective Bypassable Federally Mandated Congestion Charge, as applicable at the Facility.
- e. If Applicant is submetering with a Class I or Class III source system: Provide as **Exhibit C-2e** documentation describing how the rate charged to customers will be no greater than the Rate identified in **Exhibit C-2d**.
- f. Provide as **Exhibit C-2f** a copy of the Applicant's procedures for notifying submetered parties of changes in rates or rate classification for electric service provided to the Facility by the EDC, including copies of any notices or other written material that will be used to notify the submetered parties of any such changes. Explain how submetering account balances will be separately maintained from rental accounts.
- g. Describe in detail the Applicant's method and frequency of distributing submetered party bills.

(C-3) Submetering Rules and Regulations (cont'd):

- a. Provide as **Exhibit C-3a** a copy of a sample bill that will be sent to submetered parties. In addition to meeting the basic requirements of Conn. Agencies Regs. [§ 16-11-107\(c\)](#), the following standards must be met:

- (i) For traditional submetering (i.e. without Class I/III source) systems: The bill shall include the following items at a minimum: (1) beginning and ending meter readings and dates; (2) number of elapsed billing days represented by the bill; (3) total kWh usage; (4) average EDC rate used for billing; (5) total bill owed by the submetered party; and (6) payment history and outstanding balance.
 - (ii) For submetering with Class I/III source systems: The bill shall comply with the applicable tariff and EDC billing requirements. Applicant must ensure they utilize the latest approved EDC bill format and that line-item billing follows the order in which line-item charges appear on the EDC bill. Applicant must also ensure their bills do not appear to be from the EDC and must clearly demonstrate that the bill recipient is being submetered.
- b. Provide as **Exhibit C-3b** a copy of a sample estimated bill that will be sent to submetered parties and any written materials that will be sent to a submetered party regarding any such estimated bill. Describe the circumstances under which a submetered party might be sent an estimated bill. See Conn. Agencies Regs. [§ 16-11-107\(a\)](#) for procedures regarding use of estimated bills.
 - c. Provide as **Exhibit C-3c** a copy of sample lease including the provisions regarding electric submetering, which includes (i) any fee charged for submetering, security deposits, late fees, and any other charges and/or conditions for electric service in addition to those of the electric distribution company, and (ii) customer service contact information for the submetered party's questions regarding their electric bill. **See D-7 and D-8 below** for requirements regarding statement(s) of fees in the lease.

(C-4) Submetering Rules and Regulations (cont'd):

- a. Provide as **Exhibit C-4a** a copy of the Applicant's written procedures and likely reasons for adjustments to bills. See Conn. Agencies Regs. [§ 16-11-110](#) for requirements.
- b. Provide as **Exhibit C-4b** all documents provided to the submetered party informing them of their rights and who to contact with questions regarding their bills.

(C-5) Submetering Rules and Regulations (cont'd):

- a. State whether Applicant's employees, whose duties include entering into a submetered party's unit, wear a distinguishing uniform and/or display a photo identification card identifying the person as an employee of the Applicant.
- b. Provide as **Exhibit C-5b** a copy of the Applicant's procedures governing entry of a submetered party's unit by an employee of the Applicant, including but not limited to notice of any such entry provided to the submetered party, which procedures must comply with the requirements of Conn. Gen. Stat. § 47a-16.

(C-6) Submetering Rules and Regulations (cont'd):

See Final Decisions in [Docket No. 13-01-26](#) and [Docket No. 13-01-26RE01](#) for a summary of applicable Statutes, Connecticut Agencies Regulations, and Authority rules.

By checking the box below, Applicant agrees they have read and will comply with relevant Statutes, Connecticut Agencies Regulations, and rules established by the Authority in its final decisions regarding electric submetering.

Acknowledge: Yes

- a. Provide as **Exhibit C-6a** a copy of the Applicant's procedures implemented to test the accuracy of a submeter upon the submetered party's request.
- b. Provide as **Exhibit C-6b** all documents provided to the submetered party describing the submetered party's rights with respect to requests for tests of the accuracy of a submeter.
- c. Describe the testing procedure that will be used to test the accuracy of the submeter and state whether the procedure used will be a "certified bench test."

If a certified bench test will be utilized, state whether the Applicant will rely on a third party to provide the testing service and, if a third party will be used, state the third party's name, business address, and telephone number.

If a certified bench test will not be utilized, provide as **Exhibit C-6c1** documentation describing how that test will be performed and provide as **Exhibit C-6c2** all written material regarding the test procedure that will be provided to the submetered party.

D. COMPLIANCE WITH RULES AND REGULATIONS REGARDING CUSTOMER SERVICE AND COMPLAINT HANDLING

(D-1) Provide as **Exhibit D-1** a copy of the Applicant's customer service procedures and/or notices with respect to submetering for submetered parties at the Facility. These materials should include but are not limited to:

- a. notification to submetered parties as to how to contact the Applicant with respect to concerns, issues, or complaints as to submetering, including but not limited to billing for electric service;
- b. notification to submetered parties of their right to have the submeter tested, and the procedures for requesting a test of the submeter;
- c. notification to submetered parties of their rights with respect to adjustments to bills;
- d. notification to submetered parties that all questions regarding electric quality issues are to be directed to the property manager;
- e. notification to submetered parties that submetering must be approved by the Authority and providing the submetered party with information as to how to contact the Authority when they have complaints, issues, or concerns that they believe have not been adequately addressed by the Applicant; and
- f. retention of records for three years of submetered party complaints and inquiries concerning the submetering system and charges for electric use by submetered parties.

(D-3) Provide as **Exhibit D-3** the Applicant's procedures with respect to monitoring submetered party consumption, determining whether a deviation from the submetered party's historical usage pattern might reflect abnormal usage, notifying the submetered party regarding a change in the submetered party's usage that might signal abnormal usage, investigating and resolving any questions regarding same, and documenting these events, including but not limited to a statement as to whether the Applicant's on-site management or personnel provide a written report of problems found, the remedy, and the cost of repairs to the submetered party for any damage caused by the submetered party.

- (D-4) If the New Applicant intends to rely on a Vendor to handle submetered party inquiries and complaints, please provide the following information regarding the Vendor's customer service operations:
- a. the number of customer service representatives the Vendor currently employs for the purpose of responding to submetered party inquiries and how the Vendor determined that staffing level was appropriate;
 - b. the location and hours of operation of the Vendor's customer service center;
 - c. the number of telephone lines the Vendor maintains for submetered parties to call in;
 - d. how submetered parties are notified of the existence of Vendor's service center and how to contact it; and
 - e. whether a toll-free number is supplied to the submetered party to reach the Vendor's service center.
- (D-5) If the New Applicant does not intend to utilize a Vendor for handling submetered party inquiries and complaints, please describe the Applicant's customer service functions, including those aspects of the customer service function described in D-4 above.
- (D-6) Where and how can submetered parties' pay their electric bills?

E. ADDITIONAL INFORMATION

- (E-3) Applicant agrees that in the event it plans to cease submetering, it will file correspondence in the docket approving this Application describing how they intend to accomplish the transition away from submetering and how and when submetered parties will be notified of the change.

Acknowledge: Yes

F. ACKNOWLEDGEMENT OF APPLICABLE RULES, REGULATIONS, AND JURISDICTION

- (F-1) By submitting this Change Application and checking the box below, the Applicant and all Co-Applicant(s) acknowledge that they will be subject to the Authority's jurisdiction with respect to their submetering activities under [Conn. Gen. Stat. § 16-19ff](#), including but not limited to the Authority's power to revoke submetering approvals, order the immediate cessation of submetering, and/or impose fines pursuant to [Conn. Gen. Stat. § 16-41](#).

By checking the box below, the Applicant and all Co-Applicant(s) also agree they have read and will comply with relevant Statutes, Conn. Agencies Regs., and rules established in Authority final decisions regarding electric submetering. See the Final Decisions in Docket Nos. [13-01-26](#) and [13-01-26RE01](#) for a summary of applicable Statutes, Conn. Agencies Regs., and Authority rules.

Acknowledge: Yes

CONFIRMATION

- By checking this box, Applicant confirms they have carefully reviewed this Change Application, that all applicable sections are fully completed, and, to the best of their knowledge, that all information contained in this Change Application is accurate.

APPLICATION TO CHANGE TO VENDOR

As used in this Application, the term “**submetering customer**” means the Applicant, and the term “**submetered party**” refers to the persons, such as tenants, who are or will be receiving submetered electricity. The term “**Vendor**” means a third party retained by or on behalf of the Applicant to provide meter reading and/or billing services at the Facility to the submetered parties on behalf of the Applicant. For purposes of this Application, each such Vendor is deemed a Co-Applicant.

(A-8a) Original (or Current if different than Original) Vendor:

Name: _____
Address: _____
City: _____ Telephone: _____
Web site (if any): _____

Contact person/designated representative for service for this Change Application:

Name: _____ Title: _____
Address: _____
City: _____ Main Telephone: _____
Telephone: _____ Fax: _____
E-Mail Address: _____

(A-8b) New Vendor:

Name: _____
Address: _____
City: _____ Telephone: _____
Web site (if any): _____

Contact person/designated representative for service for this Change Application:

Name: _____ Title: _____
Address: _____
Telephone: _____ Fax: _____
E-Mail Address: _____

(A-9) If New Vendor has office(s) in Connecticut, provide the following information regarding New Vendor’s principal Connecticut office:

Address: _____
City: _____
Telephone: _____ Fax: _____

(A-10) New Vendor’s Federal Employer Identification Number (FEIN): _____

(A-11) New Vendor’s Connecticut Tax Identification Number: _____

(A-12) New Vendor’s legal form of ownership:

- Corporation
- LLC
- Cooperative
- Other: _____ (please specify)

(A-13) New Vendor was formed or organized on _____ in _____, _____.

(A-15) Is New Vendor currently under investigation, or has New Vendor ever been fined, sanctioned or penalized, in any state for violation of any consumer protection law or regulation?

- Yes If yes, provide **Exhibit A-11: “Violation of Consumer Protection Law.”** For each current investigation, provide all of the following: name of the state and agency conducting the investigation; date on which investigation began; description of the alleged violation; and status of the investigation. For each fine, sanction, or penalty, provide all of the following: date of the fine, sanction, or penalty; name of state and agency imposing the fine, sanction, or penalty; description of the violation; description of the fine, sanction, or penalty, including monetary amounts, if applicable; and copy of the order imposing the fine, sanction, or penalty.
- No

(A-16) Describe the New Vendor’s experience with submetering, the size and scope of its operations, and any other information that would assist the Authority in determining whether the New Vendor has the capability to provide submetering services.

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For purposes of the remaining sections of this Change Application, the term “Applicant” is meant to include a New Vendor where and as applicable.

“Submeter” is defined as a non-EDC electric meter located behind an EDC meter, used to measure the electric consumption of kWh by an individual end-use submetered party, such as a tenant.

Where necessary, the response to the questions in the remainder of this Change Application may be submitted on attached sheets, provided that each response is clearly labeled and pages sequentially numbered.

B. REPORTING REQUIREMENTS AND PERFORMANCE STANDARDS

(B-11) Annual Performance Standards for Traditional and Class I/III Source Systems

- a. For traditional (i.e. without Class I/III source) systems: On or before March 1st of each year, Applicant must file the annual compliance form detailing usage. The compliance form is provided as [Appendix C to the Authority’s Final Decision in Docket No. 13-01-26RE01](#) and must be filed as correspondence in the docket in which this Application is approved.
- b. For Class I/III source systems: Applicant must show that the source system meets the applicable Performance Standards (as described in Section V of the Instructions for the *Application for Approval to Install and Use an Electric Submetering System* found on the Authority’s website at <https://portal.ct.gov/PURA/About/Filing-and-Forms/PURA-Forms>). For the first 12 months following the date of approval by the Authority of this Change Application, compliance forms must be filed every 90 days, showing that the system meets the Performance Standards and explaining the circumstances surrounding any failure to meet the Performance Standards during the preceding reporting period. After 12 months, compliance forms must be filed annually on or before March 1st of each year detailing usage and production data. The compliance form is provided as [Appendix C to the Authority’s Final Decision in Docket No. 13-01-26RE01](#) and must be filed as correspondence in the docket in which this Change Application is approved.

- c. All Applicants acknowledge that the Authority can take enforcement actions, including revocation of the approval to submeter, for failure to meet the compliance obligations and performance standards.

Acknowledge: Yes

C. GENERAL COMPLIANCE WITH RULES AND REQUIREMENTS

(C-1) Submetering Rules and Regulations (EDC, supplier, billing, meter reading):

- a. Provide the name of the electric distribution company (EDC) providing distribution services to the Facility, the name of the entity(ies) supplying electricity generation services to the Facility, and the name of the entity(ies) that bill(s) the Applicant for that generation.
- b. State when Applicant will read submeters in relation to the EDC meter read date.
- (i) Traditional submetering customers are required to read submeters on the same day as the EDC master meter(s). If submeters are read manually, they must be read within one day of the EDC master meter(s) read.

For traditional submetering Applicants, acknowledge compliance with the above meter reading requirements: Yes, and provide the date submeters will be read.

- (ii) Submetering with Class I/III source systems (also known as DG submetering): Because of possible billing cycle rate change issues as described in [Docket No. 13-01-26RE01](#), submetering customers using Class I/III source systems may conduct meter readings on the first day of each month if needed.

For Applicants submetering with Class I/III source systems, acknowledge compliance with the above meter reading requirements: Yes, and provide the date submeters will be read.

- c. If Applicant cannot adhere to the applicable meter reading rules, explain why and how Applicant proposes to read submeters with a method that meets the intent of the standards outlined for meter reading in Authority decisions and Regulations.
- d. Confirm that the submetered parties will be billed only on a monthly basis. Yes

(C-2) Submetering Rules and Regulations (policies and procedures): For responses **in this Section C-2**, if none of the requested information or documentation has changed since the Applicant's approval to submeter was granted **in this docket**, Applicant may specifically refer to prior responses and exhibits filed **in this docket** or may submit the same responses and exhibits attached to this Change Application.

- a. Describe the Applicant's procedures with respect to submetered party inquiries concerning the submetering system; the operation of the submetering system; reading of submeters; labeling, marking, and mounting of submeters; access to submeters; and bills sent to the submetered parties for payment. Provide as **Exhibit C-2a** a copy of these procedures.
- b. Describe in detail the Applicant's method and frequency for non-standard billings for move-ins, move-outs, and prorating bills for a submetered party.
- c. Provide as **Exhibit C-2c** all documents provided to the submetered party describing the submetered party's rights and the procedures regarding submetered party inquiries about the submetering system, availability of the Applicant's utility billing statements and/or tariffs, the

operation of the submetering system, reading of submeters, meter testing, and submetered party billing for electric service.

- d. If Applicant is submetering with a Class I or Class III source system: Provide as **Exhibit C-2d** a copy of the relevant utility customer class rate charged for the service territory in which the Facility is located (the "Rate"). Note that Rate comprises **only** the aggregate of (i) the default general service charge, standard service, or last-resort service, as applicable at the Facility, and (ii) the respective Bypassable Federally Mandated Congestion Charge, as applicable at the Facility.
- e. If Applicant is submetering with a Class I or Class III source system: Provide as **Exhibit C-2e** documentation describing how the rate charged to customers will be no greater than the Rate identified in **Exhibit C-2d**.
- f. Provide as **Exhibit C-2f** a copy of the Applicant's procedures for notifying submetered parties of changes in rates or rate classification for electric service provided to the Facility by the EDC, including copies of any notices or other written material that will be used to notify the submetered parties of any such changes. Explain how submetering account balances will be separately maintained from rental accounts.
- g. Describe in detail the Applicant's method and frequency of distributing submetered party bills.

(C-3) Submetering Rules and Regulations (cont'd):

- a. Provide as **Exhibit C-3a** a copy of a sample bill that will be sent to submetered parties. In addition to meeting the basic requirements of Conn. Agencies Regs. [§ 16-11-107\(c\)](#), the following standards must be met:
 - (i) For traditional submetering (i.e. without Class I/III source) systems: The bill shall include the following items at a minimum: (1) beginning and ending meter readings and dates; (2) number of elapsed billing days represented by the bill; (3) total kWh usage; (4) average EDC rate used for billing; (5) total bill owed by the submetered party; and (6) payment history and outstanding balance.
 - (ii) For submetering with Class I/III source systems: The bill shall comply with the applicable tariff and EDC billing requirements. Applicant must ensure they utilize the latest approved EDC bill format and that line-item billing follows the order in which line-item charges appear on the EDC bill. Applicant must also ensure their bills do not appear to be from the EDC and must clearly demonstrate that the bill recipient is being submetered.
- b. Provide as **Exhibit C-3b** a copy of a sample estimated bill that will be sent to submetered parties and any written materials that will be sent to a submetered party regarding any such estimated bill. Describe the circumstances under which a submetered party might be sent an estimated bill. See Conn. Agencies Regs. [§ 16-11-107\(a\)](#) for procedures regarding use of estimated bills.
- c. Provide as **Exhibit C-3c** a copy of sample lease including the provisions regarding electric submetering, which includes (i) any fee charged for submetering, security deposits, late fees, and any other charges and/or conditions for electric service in addition to those of the electric distribution company, and (ii) customer service contact information for the submetered party's questions regarding their electric bill. **See D-7 and D-8 below** for requirements regarding statement(s) of fees in the lease.

(C-4) Submetering Rules and Regulations (cont'd):

- a. Provide as **Exhibit C-4a** a copy of the Applicant's written procedures and likely reasons for adjustments to bills. See Conn. Agencies Regs. [§ 16-11-110](#) for requirements.

- b. Provide as **Exhibit C-4b** all documents provided to the submetered party informing them of their rights and who to contact with questions regarding their bills.

(C-5) Submetering Rules and Regulations (cont'd):

- a. State whether Applicant's employees, whose duties include entering into a submetered party's unit, wear a distinguishing uniform and/or display a photo identification card identifying the person as an employee of the Applicant.
- b. Provide as **Exhibit C-5b** a copy of the Applicant's procedures governing entry of a submetered party's unit by an employee of the Applicant, including but not limited to notice of any such entry provided to the submetered party, which procedures must comply with the requirements of Conn. Gen. Stat. § 47a-16.

(C-6) Submetering Rules and Regulations (cont'd):

See Final Decisions in [Docket No. 13-01-26](#) and [Docket No. 13-01-26RE01](#) for a summary of applicable Statutes, Connecticut Agencies Regulations, and Authority rules.

By checking the box below, Applicant agrees they have read and will comply with relevant Statutes, Connecticut Agencies Regulations, and rules established by the Authority in its final decisions regarding electric submetering.

Acknowledge: Yes

- a. Provide as **Exhibit C-6a** a copy of the Applicant's procedures implemented to test the accuracy of a submeter upon the submetered party's request.
- b. Provide as **Exhibit C-6b** all documents provided to the submetered party describing the submetered party's rights with respect to requests for tests of the accuracy of a submeter.
- c. Describe the testing procedure that will be used to test the accuracy of the submeter and state whether the procedure used will be a "certified bench test."

If a certified bench test will be utilized, state whether the Applicant will rely on a third party to provide the testing service and, if a third party will be used, state the third party's name, business address, and telephone number.

If a certified bench test will not be utilized, provide as **Exhibit C-6c1** documentation describing how that test will be performed and provide as **Exhibit C-6c2** all written material regarding the test procedure that will be provided to the submetered party.

D. COMPLIANCE WITH RULES AND REGULATIONS REGARDING CUSTOMER SERVICE AND COMPLAINT HANDLING

(D-1) Provide as **Exhibit D-1** a copy of the Applicant's customer service procedures and/or notices with respect to submetering at the Facility. These materials should include but are not limited to:

- a. notification to submetered parties as to how to contact the Applicant with respect to concerns, issues, or complaints as to submetering, including but not limited to billing for electric service;
- b. notification to submetered parties of their right to have the submeter tested, and the procedures for requesting a test of the submeter;

- c. notification to submetered parties of their rights with respect to adjustments to bills;
- d. notification to submetered parties that all questions regarding electric quality issues are to be directed to the property manager;
- e. notification to submetered parties that submetering must be approved by the Authority and providing the submetered party with information as to how to contact the Authority when they have complaints, issues, or concerns that they believe have not been adequately addressed by the Applicant; and
- f. retention of records for three years of submetered party complaints and inquiries concerning the submetering system and charges for electric use by submetered parties.

(D-3) Provide as **Exhibit D-3** the Applicant's procedures with respect to monitoring submetered party consumption, determining whether a deviation from the submetered party's historical usage pattern might reflect abnormal usage, notifying the submetered party regarding a change in the submetered party's usage that might signal abnormal usage, investigating and resolving any questions regarding same, and documenting these events, including but not limited to a statement as to whether the Applicant's on-site management or personnel provide a written report of problems found, the remedy, and the cost of repairs to the submetered party for any damage caused by the submetered party.

(D-4) Please provide the following information regarding the New Vendor's customer service operations:

- a. the number of customer service representatives the Vendor currently employs for the purpose of responding to submetered party inquiries and how the Vendor determined that staffing level was appropriate;
- b. the location and hours of operation of the Vendor's customer service center;
- c. the number of telephone lines the Vendor maintains for submetered parties to call in;
- d. how submetered parties are notified of the existence of Vendor's service center and how to contact it; and
- e. whether a toll-free number is supplied to the submetered party to reach the Vendor's service center.

(D-6) Describe where and how submetered parties can pay their electric bills.

E. ADDITIONAL INFORMATION

(E-3) Applicant agrees that in the event it plans to cease submetering, it will file correspondence in the docket approving this Application describing how they intend to accomplish the transition away from submetering and how and when submetered parties will be notified of the change.

Acknowledge: Yes

F. ACKNOWLEDGEMENT OF APPLICABLE RULES, REGULATIONS, AND JURISDICTION

(F-1) By submitting this Change Application and checking the box below, the Applicant and all Co-Applicant(s) acknowledge that they will be subject to the Authority's jurisdiction with respect to their submetering activities under [Conn. Gen. Stat. § 16-19ff](#), including but not limited to the Authority's power to revoke submetering approvals, order the immediate cessation of submetering, and/or impose fines pursuant to [Conn. Gen. Stat. § 16-41](#).

By checking the box below, the Applicant and all Co-Applicant(s) also agree they have read and will comply with relevant Statutes, Conn. Agencies Regs., and rules established in Authority final decisions regarding electric submetering. See the Final Decisions in Docket Nos. [13-01-26](#) and [13-01-26RE01](#) for a summary of applicable Statutes, Conn. Agencies Regs., and Authority rules.

Acknowledge: Yes

CONFIRMATION

- By checking this box, Applicant confirms they have carefully reviewed this Change Application, that all applicable sections are fully completed, and, to the best of their knowledge, that all information contained in this Change Application is accurate.

APPLICATION TO CHANGE FEE(S)

As used in this Change Application, the term “submetering customer” means the Applicant, and the term “submetered party” refers to the persons, such as tenants, who are or will be receiving submetered electricity.

For purposes of this Change Application, the term “Applicant” is meant to include a Vendor where and as applicable.

“Submeter” is defined as a non-EDC electric meter located behind an EDC meter, used to measure the electric consumption of kWh by an individual end-use submetered party, such as a tenant.

Where necessary, the response to the questions in this Change Application may be submitted on attached sheets, provided that each response is clearly labeled and pages sequentially numbered.

D. COMPLIANCE WITH RULES AND REGULATIONS REGARDING FEES

- (D-7) Is the submetered party charged a service fee for submetering? If so, state the total fee, and state how often the fee is billed (e.g., monthly, quarterly, etc.).
- (D-8) Provide as **Exhibit D-8** an itemization of all potential fees a submetered party can be asked to pay with respect to submetering, including but not limited to any late fee and/or service fees described in D-7 above. This itemization should describe the nature and amount of the fee(s), and must be included in any lease agreement with a submetered party, as provided in **Exhibit C-3c** above.

E. ADDITIONAL INFORMATION

- (E-3) Applicant agrees that in the event it plans to cease submetering, it will file correspondence in the docket approving this Application describing how they intend to accomplish the transition away from submetering and how and when submetered parties will be notified of the change.

Acknowledge: Yes

F. ACKNOWLEDGEMENT OF APPLICABLE RULES, REGULATIONS, AND JURISDICTION

- (F-1) By submitting this Application and checking the box below, the Applicant and all Co-Applicant(s) acknowledge that they will be subject to the Authority’s jurisdiction with respect to their submetering activities under [Conn. Gen. Stat. § 16-19ff](#), including but not limited to the Authority’s power to revoke submetering approvals, order the immediate cessation of submetering, and/or impose fines pursuant to [Conn. Gen. Stat. § 16-41](#).

By checking the box below, the Applicant and all Co-Applicant(s) also agree they have read and will comply with relevant Statutes, Conn. Agencies Regs., and rules established in Authority final decisions regarding electric submetering. See the Final Decisions in Docket Nos. [13-01-26](#) and [13-01-26RE01](#) for a summary of applicable Statutes, Conn. Agencies Regs., and Authority rules.

Acknowledge: Yes

CONFIRMATION

- By checking this box, Applicant confirms they have carefully reviewed this Change Application, that all applicable sections are fully completed, and, to the best of their knowledge, that all information contained in this Change Application is accurate.

AFFIDAVIT
(for all changes)

“Veracity of Statements”

State of _____

Town _____ ss

County of _____

_____, Affiant, being duly sworn/affirmed according to law, deposes
(Name of Affiant)

and certifies under penalty of false statement that:

He/she is the _____ of _____;
(Office of Affiant) (Company/Organization)

He/she is authorized to and does make this affidavit for said New Applicant;

All statements made in the Change Application are true and complete and that it will also amend its Change Application while the Change Application is pending if any substantial changes occur regarding the information provided in the Change Application within ten days of any such change.

The facts set forth above are true and correct to the best of his/her knowledge, information, and belief and that he/she expects said New Applicant to be able to prove the same at any hearing hereof.

Signature of Affiant

Sworn and subscribed before me this _____ day of _____, _____.
Month Year

Signature of official administering oath

Print Name and Title

My commission expires _____.