

SECTION 7: 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 & 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 speak with PURA's decisional staff and commissioners regarding active Authority proceedings, 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 2022, staff reviewed nearly 7,750 licenses and certifications statewide, including but not limited to electric and water submetering applications, renewable generator certification ([Class I, II & III](#)), and electric supplier licensing applications and natural gas seller registrations:

- 7,623 Class I Renewable Energy Certifications
- 4 Class III Renewable Energy Certifications
- 10 Electric Submetering Applications
- 15 Water Submetering Applications
- 20 Natural Gas Seller Registrations
- 25 Wireless Facilities Within the Public Rights-of-Way (1 closed without approval) Applications
- 36 Installation of Wireline Facilities Under and Over the Public Rights-of-Way Applications
- 5 Telecom Certificates of Public Convenience and Necessity
- 1 Electric Supplier License Application
- 2 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 maintains 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 2022, a year where global and economic factors had a disruptive effect on energy markets, EOE staff supported thousands of customers 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 2022.

Over the past year, the 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 twelve supplier enforcement actions, amounting to over \$9 million in settlement and customer restitution. Of this, approximately \$8.5 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 and resulted in the relinquishment of 14 Supplier Licenses (some of which were portions of settlements).

As part of continued efforts to monitor supplier actions, in 2022, EOE:

- Streamlined and provided inputs to the Annual Renewable Portfolio Standards (RPS) program, among other efforts, through Docket No. 22-06-01, Annual Review of Connecticut's Electric Suppliers' and Electric Distribution Companies' Compliance with Connecticut's Renewable Energy Portfolio Standards in the Year 2021.
- Drafted the report to the legislature on suppliers, supplier licensing, and submetering applications for 2022 in Docket No. 21-11-01, Annual Report to the Legislature – The State of Electric Competition, and began work on the 2023 report in Docket No. 22-11-01, 2022 PURA Report to the General Assembly Regarding the State of Electric Competition.
- Contributed to Docket No. 17-12-03RE11, PURA Investigation into Distribution System Planning of Electric Distribution Companies – New Rate Designs and Rates Review, and 18-06-02RE01, Two Year Review Requires Pursuant to Conn. Gen. Stat § 16-245 O(M), through research, analysis, and investigation for the implementation of a Low-Income Discount Rate (LIDR) in Connecticut, and the practices of suppliers that disparately impact low-income customers.

Additionally, EOE negotiated a \$3 million settlement with the AVANGRID family of companies (United Illuminating, Connecticut Natural Gas and Southern Connecticut Gas) for violations related to failing to correctly inform low-income customers of payment protections during the COVID-19 pandemic and unlawful gas marketing practices. Of this, \$2.7M will be used to pay down overdue balances for hardship customers. The remaining \$300,000 was shared among stakeholder and advocacy organizations for utility education programs serving low-income consumers. Table 8 summarizes EOE's settlements through 2022.

Table 8: 2022 EOE-Facilitated Settlements

Entity	Settlement/ Restitution	Docket No.	Docket Title	Comment
Summer Energy Northeast, LLC	\$1,250.00	13-11-04	Application of REP Energy for Electric Supplier License	Settlement after NOV; donation to Operation Fuel
Constellation New Energy, Inc.	\$17,000.00	06-07-11	Application of Constellation New Energy for Expansion of its Electric Supplier License	Settlement after NOV; donation to Operation Fuel
Spark Energy, L.P.	\$41,953.03	10-06-18 RE03	Application of Spark Energy, L.P. for an Electric Supplier License - Investigation into Marketing, Billing, and Enrollment Practices and Notification Compliance	Settlement without NOV; donation to Operation Fuel and restitution to customers
Atlantic Energy MA, LLC	\$1,000,000	18-09-14 RE02	Application Of Discount Power, Inc. For An Electric Supplier License	Settlement after NOV and initial court ruling; payment to EDCs toward hardship arrearages (80/20 split)
Major Energy Electric Services, LLC	\$15,312.50	14-03-03	Application Of Major Energy Electric Services, LLC For an Electric Supplier License	Settlement without NOV; restitution to customers

Think Energy, LLC	\$10,458.22	11-10-14	Application Of GDF Suez Retail Energy Solutions, LLC d/b/a Think Energy for an Electric Supplier License	Settlement without NOV; restitution to customers
Public Power, LLC	\$3,000,000	07-06-13	Application Of Public Power, LLC f/k/a Public Power & Utility, LLC For an Electric Supplier License	Settlement without NOV; payment to EDCs toward hardship arrearages (80/20)
Verde Energy USA, Inc.	\$1,959,975.44	09-06-08	Application of Verde Energy USA, Inc. fka Verde Energy Savings for an Electric Supplier License	Marketing investigation donation to hardship arrearages, restitution to customers served at a rate above standard service and enrolled after May 1, 2019, and \$100 bill credit to each current customer served at a rate below standard service
Think Energy, LLC	\$5,000.00	11-10-14	Application of GDF Suez Retail Energy Solutions, LLC dba Think Energy for an Electric Supplier License	Penalty for misalignment between website and Rate Board; paid to Operation Fuel
Eligo Energy CT, LLC	\$3,030,727.11	14-09-11	Application of Eligo Energy CT, LLC for an Electric Supplier License	Marketing investigation resulting in donation to hardship arrearages and restitution to customers; pre-NOV

<p>Southern Connecticut Gas Company, Connecticut Natural Gas Corporation, The United Illuminating Company</p>	<p>\$3,000,000</p>	<p>20-03-15 & 21-08-24</p>	<p>Emergency Petition of William Tong, Attorney General for the State of Connecticut for a Proceeding to Establish a State of Emergency Utility Shut-off Moratorium; Petition of William Tong, Attorney General for the State of Connecticut, and The Office of Consumer Counsel for an Investigation into Eversource Energy Regarding Gas Expansion Marketing</p>	<p>Settlement Agreement-- (\$300,000 paid in equal parts to Operation Fuel, Inc., Connecticut Legal Services, Inc. and Center for Children's Advocacy, Inc., and \$2,700,000 to pay down arrearages of Companies' hardship customers)</p>
<p>TOTAL</p>	<p>\$12,063,426.17</p>			

Additional dockets brought to decision or administration by EOE this year, include:

- Docket No. 21-10-13, Allocation Public Educational and Governmental Programming and Educational Technology Investment Account pursuant to Conn. Gen. Stat. § 16-331cc:
 - PURA awarded Public, Educational and Governmental Programming and Education Technology Investment Account (PEGPETIA) grants. The amount of funding in the PEGPETIA account available for distribution in 2021 was \$2,607,129. Pursuant to Conn. Gen. Stat. § 16-331cc(b), fifty percent (50%) of this amount is to be available for “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 and 50% for “public, educational and governmental” projects. The Authority received 97 qualifying applications for PEGPETIA funds; 42 seeking funds for “public, educational and governmental” projects and 55 were seeking funds for “education technology initiatives”. PURA awarded \$1,303,565 to qualifying applications of both

types, for a total disbursement of over \$2.6 million. PURA established Docket No. 22-10-02 for the next round of PEGPETIA grants.

- Docket No. 21-10-05, PURA Review of the State of Connecticut Telecommunications Relay Service 2022-2027:
 - After a competitive solicitation process, PURA awarded the contract to provide Telecommunications Relay Service in Connecticut to Hamilton Relay, Inc (Hamilton). TRS enables telephone communication between a hearing or speech impaired person using a Text Telephone (TTY) or a Telecommunications Device for the Deaf (TDD) and persons using a telephone for voice communications. Currently, relay service also enables communication between a hearing and speech-impaired person via the telephone network and customers with mobile devices or computers. In addition, Hamilton subcontracted with Solix, Inc. to provide the billing and collection functions. Telecommunications providers offering service in Connecticut are assessed their proportionate share of the cost for providing intrastate Telecommunications Relay Service. This docket is reopened every 5 years to review proposals and choose a TRS provider.
- Rate Cases: EOE supported efforts in the Aquarion and United Illuminating rate cases (Docket No. 22-07-01 and Docket No. 22-08-08) 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](#)

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The Education and Outreach team also manages the “[Utility Scorecard](#)” report. The Scorecard is a collection of ten 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 2022, the Education & Outreach Unit responded to over 12,700 complaints and inquires. As a result of complaint resolution, EOE was able to secure the return of over \$100,000 to customers, demonstrated by Tables 9 and 10 below:

- 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 9: 2022 Customer Complaints and Inquiries by Industry

Industry Type	Quantity*
Community Antenna Television	4462
Electric	2633
Natural Gas	1100
Gas Reseller	2
General Info	2281
Suppliers/Electric Aggregators	812
Telephone	899
Telephone Other	209
Video Service Provider	154
Water	188
TOTAL	12,740

*Data available through 12/20/2022

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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.

EOE also led the formation of 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 was established to address programmatic improvements and emerging issues regarding utility vegetation management for the maintenance of distribution lines. The working group will evaluate current practices and make recommendations as needed for legislative, regulatory, or other improvements, and produce annual reports for PURA as per the final decision dated August 31, 2022 in Docket No. 17-12-03RE08.

EOE also serves as the facilitator of the 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.