

**Office of Consumer Counsel
Annual Report
Fiscal Year 2021-2022**



At a Glance

Claire E. Coleman, Consumer Counsel

Office of Consumer Counsel Established - 1975

Statutory authority - Connecticut General Statute §16-2a Central office - Ten Franklin Square, New Britain, CT 06051 Number of employees as of June 30, 2022 – 15

Recurring operating expenses - \$3,515,341

Organizational structure – OCC is an independent office, within the Department of Energy and Environmental Protection for administrative purposes only.

Mission

The Office of Consumer Counsel serves as a strong independent voice for Connecticut’s public utility and telecommunications consumers through policy advocacy, legal representation, and customer education.

Statutory Responsibility

The Office of Consumer Counsel’s (“OCC”) statutory responsibilities, pursuant to Sec. 16-2a of the Connecticut General Statutes, include:

- Advocating for Connecticut’s ratepayers in all matters relating to public service companies, electric suppliers, certified video service providers, and certified telecommunications providers;
- Participating in any regulatory or judicial proceedings, federal or state, that involve the interests of Connecticut utility ratepayers, or matters affecting utility services provided in Connecticut;
- Representing utility ratepayers and consumers as a party in contested dockets before the Public Utilities Regulatory Authority (“PURA”);
- Appealing decisions, orders, or authorizations in any state regulatory proceeding impacting utility ratepayers;
- Addressing issues involving rate increases and ratepayer-funded programs, as well as

matters concerning the reliability, maintenance, operations, infrastructure, and quality of service of utility companies, suppliers, and providers;

- Working actively with the Connecticut General Assembly, including the Energy and Technology Committee, in developing utility, energy and telecom related legislation in the best interests of consumers; and
- Through the Office of State Broadband (“OSB”) established within OCC in 2015 by the General Assembly, facilitating the availability of broadband access to every state citizen and increasing access to and adoption of high-speed broadband internet access networks in Connecticut.

Public Service

OCC represents the interests of consumers of Connecticut’s public utilities, including the industries of electricity, gas, water, cable, and telecommunications. OCC regularly appears before PURA, participates in the legislative process, represents consumers in appellate litigation, serves as a voting member of the New England Power Pool, participates in proceedings and litigation before the Federal Energy Regulatory Commission, the Federal Communications Commission, and other regional and federal entities, and provides consumers with critical information related to utility service.

Improvements/Achievements Fiscal Year 2021–2022

In Fiscal Year 2021-2022 (July 1, 2021 – June 30, 2022), OCC continued through the ongoing pandemic to operate as a fully independent state agency committed to effectively carrying out its statutory mandate. On November 10, 2021, Governor Ned Lamont announced the nomination of Claire Coleman to serve as Consumer Counsel for the State of Connecticut. On March 16, 2022, the Connecticut General Assembly confirmed her nomination for a five-year term. Under Consumer Counsel Coleman’s leadership, OCC’s dedicated and talented staff continue to serve Connecticut consumers through strategic and data-driven advocacy.

OCC’s specific achievements this Fiscal Year include:

Savings to Consumers: OCC achieved over \$420 million dollars in direct savings to Connecticut ratepayers in the 2021-2022 Fiscal Year through OCC’s advocacy (along with other allies and stakeholders, including fellow state agencies) in dockets before PURA, state court decisions, and advocacy in matters before the Federal Energy Regulatory Commission (“FERC”), including the following:

- In an October 2021 joint settlement with Eversource, the Governor’s Office, Office of the Attorney General, the Department of Energy and Environmental Protection and the OCC, Eversource/Connecticut Light & Power customers received \$103.4 million in direct ratepayer benefits through the adoption of an accountability plan that provided rate credits to customers in December 2021 and January 2022, additional low-income assistance funding and \$150 million of estimated rate benefits for a distribution rate freeze through at least January 2024;
- \$78 million in ratepayer benefits through the continuation of the rate plans approved in

rate case settlements with Yankee Gas, Southern Connecticut Gas Company, and Connecticut Natural Gas Corporation;

- \$66.6 million in ratepayer benefits from the rate settlement with the United Illuminating (“UI”) Company;
- \$12.1 million in ratepayer savings associated with the OCC’s litigation efforts in the Connecticut Water Company rate application; and
- Continued rate freeze for Aquarion Water Company customers during settlement discussions and PURA proceeding;
- \$10 Million in OCC’s advocacy in the annual proceeding in which PURA reviews and trues up Eversource Energy’s prior year’s revenue recovery via its Rate Adjustment Mechanisms (“RAM”);
- \$1.2 Million through OCC’s advocacy in the annual proceeding in which PURA reviews and trues up United Illuminating’s prior year’s revenue recovery via its RAM.

I. Advocacy in PURA Dockets: OCC was a party representing consumers in over 450 dockets during Fiscal Year 2021-2022 that were opened or re-opened by PURA. Some key dockets include:

a. Energy Affordability and Rates

- Docket No. 17-12-03RE11, *PURA Investigation into Distribution System Planning of the Electric Distribution Companies – New Rate Designs and Rates Review*, was initiated following the ratification of Public Act 20-5, An Act Concerning Emergency Response By Electric Distribution Companies, The Regulation Of Other Public Utilities And Nexus Provisions For Certain Disaster-related Or Emergency-related Work Performed In The State. The Authority has divided this docket into multiple phases, three of which have been completed with active OCC participation (regarding an optional volumetric tariff for certain Commercial and Industrial customers, the review and allowance of 2 settlement agreements in which the United Illuminating Company will employ certain measures to mitigate a rate increase, and a second similar settlement agreement with Eversource Energy in which it also took certain steps to minimize the impact of an impending rate increase.). PURA is currently at the end of its investigation regarding the establishment of a low-income discount rate pursuant to P.A. 20-5. A decision regarding the form and structure of the low-income discount rate is expected in September 2022. PURA has not yet announced when it plans to continue its investigation into business development rates. The OCC has actively participated in all phases of this docket, including technical sessions, written comments, and briefing, and supports its goals.
- In Docket No. 19-12-25, *Petition Of Northland Investment Corporation For A Declaratory Ruling As To The Authority's Application Of C.G.S. Sec. 16-262e To Allocation Of Utility Expenses In Rent*, PURA addressed the legality of “ratio utility billing systems” (RUBS) under Connecticut law upon request of a residential apartment complex owner. OCC strongly advocated against RUBS, which based on its reading of the relevant statute, would violate Connecticut law as well as unfairly saddle tenants with energy costs for which they were not solely responsible. PURA’s Final Decision confirmed that RUBS do not reflect a tenant’s exclusive use of utility services and

therefore unpermitted by law. In doing so, PURA adopted OCC's relevant positions. Following that Decision, the petitioner appealed to the Superior Court, where OCC intervened to ensure consumers are adequately represented. The Superior Court remanded the appeal to PURA for consideration of an additional issue. PURA issued its Supplemental Decision in November 2021 following the directive of the Superior Court to include additional analysis. The Plaintiff appealed the Supplemental Decision again in December 2021. (See details in litigation updates below *Northland Investment Corporation v. Public Utilities Regulatory Authority*, HHB-CV22-6070030-S). OCC participated in the subsequent appeal in which PURA prevailed. Plaintiff appealed to the Appellate Court, which remains pending.

- Docket No. 22-01-03 is the annual proceeding in which PURA reviews and trues up Eversource Energy's prior year's revenue recovery via its Rate Adjustment Mechanisms ("RAM"). OCC continues to tirelessly advocate for minimal rate adjustments, ratepayer impact awareness and pragmatic recovery processes by the Company. OCC has retained subject matter expert consultants, propounded significant discovery, participated in evidentiary hearings, and presented briefs and oral arguments for PURA's consideration. In the final stage of this year's proceeding, OCC identified four areas of Eversource's application where the company appeared to have sought greater cost recovery than permissible, and OCC advocated that PURA disallow the recovery of \$10,528,886 in total costs. PURA issued its Final Decision in this year's proceeding on August 17th, 2022, which adopted the majority of OCC's arguments and disallowed recovery of \$10,088,520 in costs; resulting in an overall rate decrease for Eversource customers.
- Docket No. 22-01-04, *PURA Annual Review of the Rate Adjustment Mechanisms of the United Illuminating Company*, is the annual proceeding in which PURA reviews and trues up United Illuminating's prior year's revenue recovery via its Rate Adjustment Mechanisms ("RAM"). OCC achieved many of its objectives in this proceeding, including long-sought reforms to UI's accounting practices which were structured in a way that disadvantaged ratepayers. OCC succeeded in advocating for adjustments that yielded approximately 1.2 million in savings for UI ratepayers.
- Docket No. 22-02-05, *Investigation into Eversource's Practices regarding Customer Credit Card Charges*. OCC has filed comments supporting a full evaluation of utility credit card fee practices. PURA's resolution of this issue remains pending.
- Docket No. 22-03-16, *Petition of the Office of Consumer Counsel for an Investigation into the United Illuminating Company and Eversource Energy Regarding Collections Practices During the Covid-19 Moratorium*. In March of 2022, OCC filed a petition with PURA requesting an investigation of the regulated companies' debt collection practices during the COVID-19 pandemic. Through the investigation, OCC discovered that the companies each imposed different collections efforts throughout the pandemic that varied in degree of severity, resulting in unequal experiences by utility customers. OCC found that Avangrid's practices in some cases had disruptive impacts upon vulnerable customers who were already undergoing financial distress. OCC also argued that the Avangrid companies violated one of PURA's orders pertaining to the shut-off moratorium and requested that PURA open a docket to consider civil penalties for those violations. PURA is scheduled to issue a decision in September 2022. OCC looks

forward to continuing to work towards ensuring that collections practices are reasonable, fair, and affect all customers equally, and that the regulated companies comply with PURA's directives.

- Docket No. 21-07-01, *Application Of The Connecticut Light And Power Company And Yankee Gas Services Company, Each Individually D/B/A Eversource Energy, The United Illuminating Company, Connecticut Natural Gas Corporation, And The Southern Connecticut Gas Company For Approval Of Arrearage Forgiveness Program 2021-2022*. OCC has been active in this annual docket by participating in technical meetings, hearings, requests for written comments and briefing. In October 2021, prior to the start of the heating season, the Authority approved the Companies' Arrearage Forgiveness plans subject to certain modifications. In its Final Decision of April 2022, the Authority announced plans to establish a centralized data reporting platform, expand flexible payment arrangement offerings for customers, and modify the Companies' existing medical web portals. The Authority also established an annual review proceeding (Docket 22-05-01, *Energy Affordability Annual Review*) to address energy affordability and related matters (), which will include the review of the proposed annual Joint Arrearage Forgiveness Program Plan (AFP Plan) pursuant to Conn. Gen. Stat. § 16-262c(b)(5). OCC has also been participating in this new annual review by recommending continued improvements to utility communications and outreach efforts on bill payment assistance programs and other programs designed to address affordability and will continue to be active in this docket.
- Docket No. 21-05-15, *PURA Investigation into a Performance-Based Regulation Framework for the Electric Distribution Companies*. PURA is investigating enhancing our state's performance-based ratemaking tools to better align the regulated utilities' business incentives with the interests and needs of Connecticut consumers. OCC has retained consultants in this matter who have advised utility commissions in other jurisdictions on PBR frameworks, which now serve as guideposts for the formulation of Connecticut's framework. OCC recently filed substantial comments analyzing Connecticut's current utility regulation scheme, making suggestions for changes that would improve ratepayer protections and clear some barriers to state energy policy goals. OCC looks forward with great interest to continued participation in this important initiative.
- Docket No. 13-09-06, *Application of Sunwave Gas & Power Connecticut, Inc. for an Electric Supplier License*. Following Sunwave's default of its obligations to NEPOOL, OCC advocated that the company pay restitution to all its Connecticut customers who were then receiving service and had been dropped from their contracts. Ultimately, OCC succeeded in PURA awarding \$20 per month for residential customers and \$40 per month for commercial customers for the remainder of each underlying contract. Sunwave ultimately failed to make these required payments and OCC remains engaged in an additional proceeding in which PURA has sought to revoke Sunwave's license given its refusal to comply with PURA orders.
- Docket No. 14-07-19RE06, *PURA Investigation into Redesign of the Residential Electric Billing Format – Five-Year Review* was initiated to examine the format of residential electric bills for Eversource and United Illuminating customers to determine whether they

could be improved for greater transparency and understanding. OCC advocated for clear and comprehensible bill redesigns with the goals of enhancing Connecticut ratepayers' understanding of the various components of their electric bills and aligning the formats of the two electric distribution companies to improve overall customer experience between the companies' territories. PURA issued a decision on July 27, 2022, with specific directions for the companies to adjust their bill layouts. OCC will be reviewing the companies' compliance with those orders and continuing to participate in the important work of cost-effectively designing the clearest, most understandable bills.

- Docket No. 14-07-19RE07, *PURA Investigation Into Redesign Of The Residential Electric Billing Format – Cost Allocation Among Suppliers For System Redesign And Associated Costs*. In a previous iteration of this docket, 14-07-19RE05, OCC had advocated that suppliers and not ratepayers be financially responsible for costs associated with upgrading their bills to comply with next cycle rate billing requirements pursuant to statute. PURA agreed and opened this proceeding to assess costs among the suppliers. PURA's decision remains pending and OCC remains steadfast in its belief that these are costs that ratepayers should not be responsible for.
- Dockets No. 22-01-01 & 22-01-02, *EDC Standard Service and Last Resort Service Procurement*, OCC continues to work with PURA's Procurement Manager and both utilities to purchase wholesale electricity on behalf of ratepayers consistent with §16-244m of the General Statutes of Connecticut. These purchases eventually flow into all rate classes on the supply portion of the bill. The procurement team follows the procurement plan approved by PURA to mitigate risk and price shocks to the greatest extent possible. It is OCC's goal to provide ratepayers with the least cost energy while also prioritizing reliability and supporting the state goals to decarbonize. The energy crisis of 2022 brought about by Russia's invasion of Ukraine and the subsequent global energy market turmoil has presented unprecedented challenges to the procurement of standard service. Although prices are high, it is notable that Connecticut's approach has yielded lower prices than those in other New England states.

b. Clean Energy and Grid Modernization

- In Docket No. 17-12-03RE02, *PURA Investigation Into Distribution System Planning Of The Electric Distribution Companies – Advanced Metering Infrastructure*, PURA is investigating the deployment of Advanced Metering Infrastructure (AMI) for the EDCs, particularly Eversource Energy, which at this time does not utilize AMI. OCC has participated in this docket through evaluation of the EDCs proposed business cases for statewide AMI deployment in Connecticut. This docket also evaluates the business case for technologies and systems related to AMI (smart meter) deployment, including information technology, data management, DER management, and billing systems, among others. OCC has fully participated in this proceeding, advocating for a balanced and strategic approach to AMI deployment to ensure the greatest benefit to all consumers, through written comments, briefing, and participation in technical sessions and hearings. A final decision in this proceeding remains pending, which may outline service territory-specific AMI deployment implementation details, to be vetted in a subsequent contested case rate proceeding, where appropriate.

- In Docket No. 17-12-03RE04, *PURA Investigation Into Distribution System Planning Of The Electric Distribution Companies – Zero Emission Vehicles*, PURA established a framework for the supported deployment of electric vehicle charging infrastructure in order to meet the state’s electric vehicle targets. OCC actively participated in the underlying docket, supporting ZEV infrastructure deployment while advocating for ratepayer protections such as the utilization of a program-specific cost benefit analysis; provisions to ensure that the program monitors and makes adjustments to account for any applicable federal funding or private market activity; and the creation and implementation of clear program budgets. OCC has remained active in this area of advocacy via the annual review proceedings that arose from PURA’s 2021 decision in the underlying docket, as well as proceedings addressing other EV initiatives such as Docket No. 21-09-17 as discussed below.
- In Docket No. 17-12-03RE05, *PURA Investigation Into Distribution System Planning Of The Electric Distribution Companies – Innovative Technology Applications And Programs (Innovation Pilots)*, PURA investigated the creation of an Innovative Pilots Program that would increase development and utilization of potential new technologies to benefit ratepayers. OCC participated in this proceeding to ensure that the program balanced the potential benefits of innovative pilot programs that could result in overall ratepayer benefits with risks that ratepayer dollars could be spent on pilot programs that may not yield any actual benefits. PURA’s final decision considered some of OCC’s suggestions to better protect ratepayers in its Final Decision, and OCC is a participant in the Innovation Advisory Council established as part of the Innovative Energy Solutions Program, through which OCC will continue to advocate for an approach to pilots that brings the most benefits to Connecticut consumers at least cost and risk.
- In Docket No. 17-12-03RE06, *PURA Investigation Into Distribution System Planning Of The Electric Distribution Companies – Interconnection Standards and Practices*, PURA investigated the development of interconnection standards, a process which OCC was supportive of throughout. OCC subsequently participated in a Working Group to develop a structure and bylaws for a standing Interconnection Working Group to address interconnection issues in Connecticut. OCC remains a member of that Group, with two members of the OCC staff serving as designees. PURA opened a subsequent docket (Docket No. 22-06-29) through which it is currently focused on investigating how to allocate costs between developers and ratepayers. While supporting interconnection standards that will facilitate the deployment of solar in Connecticut, OCC continues to advocate to protect ratepayers from shouldering an unfair share of interconnection costs.
- In Docket No. 17-12-03RE07, *PURA Investigation Into Distribution System Planning Of The Electric Distribution Companies – Non-Wires Alternatives*, PURA is investigating the need to establish a more transparent competitive process for considering alternatives to traditional electric distribution system infrastructure in certain circumstances, such as where a solar/storage project might be preferable to a traditional hard-wired grid connection. Last year, PURA released a Straw Proposal that would empower a third-party administrator, in concert with OCC, DEEP, and other stakeholders, to determine whether there are more cost-effective or carbon-neutral non-wires alternatives to major planned utility investments. In May of 2022, PURA released proposed program mechanics that refined the concepts from the Straw Proposal, and OCC filed supportive comments

including some recommendations to maintain competition amongst private market and utility participants, and additional general protections for ratepayers. OCC looks forward to continued participation in this docket, which has the potential to significantly benefit ratepayers while advancing state decarbonization goals and result in grid efficiencies that will benefit consumers.

- Docket No. 17-12-03RE08, *PURA Investigation into Distribution System Planning of the Electric Distribution Companies Resilience and Reliability Standards and Programs*, has included PURA’s investigation of the overall effectiveness of the electric distribution companies’ current resilience and reliability programs. The docket has established reliability and resilience frameworks by which the electric distribution companies (“EDCs”) must plan and implement their capital programs. OCC participated extensively in this proceeding, evaluating the proposed reliability and resiliency metrics and program frameworks proposed by the EDCs and PURA with the assistance of consultant-engineers, and ultimately made recommendations to strengthen the final Resilience and Reliability Frameworks while setting important guardrails to ensure cost-containment. PURA issued a final decision on August 31, 2022, which directs the EDCs to use the established frameworks to develop and sustain reliability and resilience programs for the Authority’s review in each company’s next rate case.
- In Docket No. 17-12-03RE09, *PURA Investigation Into Distribution System Planning Of The Electric Distribution Companies - Clean And Renewable Energy Resource Analysis And Program Reviews*, PURA set out to review the Distributed Energy Resources’ (“DER”) implementation processes, identify key performance metrics, and establish centralized reporting requirements to track deployment levels, costs, and other data associated with these programs, such as greenhouse gas emission reductions. The OCC participated in technical meetings, discovery review, and briefing. PURA issued a Final Decision in this docket in February of 2022, which established a uniform framework for PURA and stakeholders to conduct annual reviews of the grid modernization dockets.
- Docket No. 17-12-03RE10, *Building Blocks of Resource Adequacy and Clean Electric Supply*. This docket was opened to investigate near-term topics related to the objectives of PURA’s Framework for an Equitable Modern Grid, including alignment and integration of DEEP’s 2020 Integrated Resources Plan and exploration of changes to clean energy procurement and generation and REC markets to reduce ratepayer costs. OCC remains an active participant in this proceeding, which is in its early stages, with additional technical meetings scheduled for the remainder of the year.
- 22-06-29, *PURA Investigation Into Distributed Energy Resource Interconnection Cost Allocation*. See Docket No. 17-12-03RE06. This docket is in the initial fact gathering phase. As noted above, while supporting interconnection standards that will facilitate the deployment of solar in Connecticut, OCC will continue to participate going forward to make sure interconnection costs are distributed fairly and evenly
- In Docket No. 22-06-05, *PURA Implementation of Public Act 22-55*, PURA has begun an analysis of utility ownership and operation of energy storage systems to meet the objectives of *Public Act 22-55*. OCC is supportive of a front-of-meter storage program for its potential to benefit grid resiliency and reliability, and to bring us closer to a future that is not dependent upon expensive and polluting fossil fuel-powered peaking facilities.

Front-of-meter storage assets could also provide economic benefits for ratepayers via participation in wholesale capacity markets, and could displace some of the current grid externalities affecting underserved communities, such as localized pollution and inequitable outage impacts. OCC looks forward to continued participation in the development of this important program, and to advocating for both program benefits and for ensuring that ratepayer costs are balanced and appropriate.

- 22-06-03, *GB II New Haven LLC's Application for Establishment of 2023 Revenue Requirements*. This docket is to review an application to approve the establishment of revenue requirements for 2023 for the Company's peaker project at One Waterfront Street, New Haven, Connecticut. OCC is an active participant in this proceeding, which is in its early stages and remains pending.
- In Docket No. 22-06-02, *GenConn Energy LLC Application to Establish 2023 Revenue Requirements*, PURA will review the rate application submitted by GenConn, one of our state's peaking generation providers pursuant to Conn. Gen. Stat. § 16-243u. OCC participated in a contested hearing in this matter in August of 2022 and looks forward to continuing to engage in this year's review process to ensure that GenConn's expenditures are prudently incurred; that its assets are used and useful to Connecticut ratepayers; and that its proposed rate of return on equity is reasonable within the established legal standards.
- In Docket No. 21-09-17, *PURA Investigation into Medium and Heavy-Duty Electric Vehicle Charging*, PURA has opened an inquiry into the deployment of charging infrastructure for larger electric vehicles such as public and school buses, construction equipment, and heavy-duty commercial transport trucks. OCC has actively participated in the docket to advocate for the strategic and cost-effective implementation of this important infrastructure, which could provide resilience and reliability benefits, in addition to helping the state meet its carbon reduction goals, while balancing ratepayer impacts.
- In Docket No. 21-08-08, *Petition to Establish a Docket Pertaining to Public Act 21-162, An Act Concerning the Solicitation of New Fuel Cell Electricity Generation Projects*, PURA developed tariffs specific to new fuel cell electricity generation projects, and reviewed projects submitted for approval by the electric distribution companies, which were selected via a competitive bidding process. OCC joined the Department of Energy and Environmental Protection's Bureau of Energy and Technology Policy in advocating that PURA decline to approve certain fuel cell projects submitted by Eversource, because the projects failed to demonstrate sufficient benefits in accordance with the applicable statutory standards, because the projects did not align with the state's environmental goals, and because approval of the projects would result in unjustified rate impacts for Connecticut consumers. PURA issued a decision in June of 2022 rejecting approval of the projects identified in OCC's joint brief with DEEP.
- 21-08-04, *Annual Review of Statewide Shared Clean Energy Facility Program Requirements – Year 3*, OCC continues to actively participate in the yearly dockets and working groups related to the Shared Clean Energy Facility Program. In the year three program, the Authority approved modifications to the Year 2 program requirements and bid preferences. Additionally, OCC has been participated in the working group

established by the Authority to develop a proposal for affordable housing facilities to be included as subscribers under the low-income subscriptions.

c. Natural Gas

- Docket No. 21-08-24, *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*. In this proceeding OCC submitted a petition with the Attorney General requesting an investigation into the marketing activities of Yankee Gas related to the gas expansion program. Ultimately, after OCC and OAG developed the record, PURA determined that Yankee had committed multiple violations of law in its outreach to potential customers and fined Yankee \$2.1 million dollars. In an offshoot of this proceeding, PURA ultimately terminated the gas expansion program, which OCC supported, as it had increasingly failed to provide benefits to ratepayers.
- Docket No. 22-03-03, *Review of the 2021 System Expansion Reconciliation Mechanisms Filed by: Connecticut Natural Gas Corporation, The Southern Connecticut Gas Company, and Yankee Gas Services Company*. PURA established this docket proceeding to review the 2021 system expansion reconciliation (SER) filings of Connecticut Natural Gas Corporation, The Southern Connecticut Gas Company and Yankee Gas Services Company d/b/a Eversource Energy. OCC is participating in this evaluation of SER costs and revenues of the company, as well as other impacts of related rulings on the gas expansion plan. OCC's participation in this docket is ongoing.
- Docket No. 22-04-37, *Application of the Southern Connecticut Gas Company for approval of the sale of improved land in orange, Connecticut pursuant to Conn. Gen. Stat. § 16-43 and conn. Regs. §§ 16-43-1 and 16-43-3*. In this proceeding, OCC has opposed a proposed sale of Southern Connecticut Gas' primary office building which would result in a substantial loss to SCG ratepayers. In OCC's view, SCG's handling of the sale was imprudent. PURA's decision remains pending but OCC continues to advocate for SCG ratepayers.

d. Water

- Docket No. 21-04-23, *Application of Aquarion Company, Aquarion Merger Company, LLC, Aquarion Water Company of Connecticut, New England Service Company and Valley Water Systems, Inc. for Approval of Change of Control and Plan of Merger*. OCC supported this merger, which would result in Valley Water customers receiving much-needed upgrades to their water quality. PURA ultimately approved the merger.
- Docket No. 21-12-07, *Joint Application of the Connecticut Water Company and the Miami Beach Water Company for the Acquisition and Dissolution of the Miami Beach Water Company, Inc.* A small water company petitioned for permission to be acquired and improved by The Connecticut Water Company, and although OCC advocated in favor of the acquisition itself, OCC opposed The Connecticut Water Company's proposed costs to improve to the system because they did not appear to be supported by prudent cost controls, and would have resulted in not only more than doubling the volumetric rates of system customers, but also spreading costs to all Connecticut Water ratepayers – including those who would not benefit from the upgrades. PURA and the Department of Public

Health issued a Joint Final Decision in June of 2022 approving the acquisition but determining that the proposed improvement costs could not be approved before more information is provided.

II. State Litigation and Appeals:

In Fiscal Year 2021-2022, OCC was a party in one direct action in the Superior Court, thirteen (13) Administrative Appeals to the Superior Court, one Connecticut Appellate Court case, and two federal court appeals. Chief among those were:

- *Northland Investment Corporation v. Public Utilities Regulatory Authority*, HHB-CV22-6070030-S). OCC participated in this subsequent appeal to Appellate Court supporting PURA’s decision finding that “ratio utility billing systems” (RUBS) is not permitted under Connecticut law, which remains pending.
- *Direct Energy Services, LLC v. Public Utilities Regulatory Authority*, HHB-CV-21-6063122-S. In this appeal, several supplier business interests appealed PURA’s Final Decision in Docket No. 16-12-29, which established important marketing and disclosure requirements that would have assisted consumers participating in the third-party supply market. OCC intervened, briefed the issues, and argued significant constitutional legal issues before the Superior Court that the Decision should be upheld, which the Court did in full on July 23, 2021. On August 12, 2021, Appellants initiated a direct appeal to the Appellate Court (AC 44890); challenging the Superior Court’s decision, which was subsequently transferred to the Supreme Court. OCC filed its Brief in July of 2022 and argument is slated for October of 2022. OCC intends to continue its advocacy in that forum as well.
- *GenConn Energy LLC v. Public Utilities Regulatory Authority*, HHB-CV-21-6064030-S. Subsequent to the issuance of PURA’s final decision in Docket No. 20-06-14, in which PURA disallowed a total of \$4.185 million of GenConn’s requested revenue requirement, GenConn sought judicial review. The OCC’s intervened in the case in March of, 2021 and supported PURA’s defense of its decision, due to the beneficial impact to rates. The Superior Court ruled in favor of PURA in January of 2022 and GenConn appealed. The appeal is now pending before the Connecticut Supreme Court, in Docket No. SC 20716, with GenConn’s initial brief due to be filed in September. OCC will continue to support PURA’s decision in support of electric ratepayers.
- *GenConn Energy LLC v. Public Utilities Regulatory Authority*, HHB-CV-22-6070555-S. During the above-described appellate litigation pertaining to PURA’s decision as to GenConn’s 2021 revenue requirements, GenConn filed an application for its 2022 revenue requirements. PURA opened Docket No. 21-06-28 to review the application, in which OCC was also an active participant. PURA issued a decision in that docket in December of 2021, again disallowing a significant portion of the costs requested by GenConn – in this case, totaling \$11.401 million. GenConn again appealed PURA’s decision to the Superior Court, and OCC again intervened in order to support PURA’s order for its benefit to ratepayers. GenConn is scheduled to file a brief in this matter in October, and OCC will continue to participate on behalf of the interests of ratepayers.
- *Town of Enfield v. The Connecticut Water Company, Et Al.*, HHD-CV-21-6130874-S. The

Town of Enfield filed this action to the Superior Court under its original jurisdiction. Enfield sought a declaratory judgment clarifying that Enfield is not legally responsible for paying fire protection charges to The Connecticut Water Company. OCC opted to intervene out of concern that such a judgment could leave the responsibility for fire protection charges to ratepayers, and set a precedent that could lead to substantial rate impacts for all water customers in the state. OCC's motion to intervene was granted over Enfield's objection on November 24, 2020. The parties engaged in the Alternative Dispute Resolution process where OCC raised the issue that PURA had approved The Connecticut Water Company's rules and regulations in a recent rate case, and that such rules and regulations made it clear that Enfield was in fact responsible for the applicable costs. Enfield withdrew its court action in December of 2021, and has apparently discontinued its efforts to pass these costs along to ratepayers.

- *Tropical Storm Isaias Litigation*. Following PURA's Decisions in Docket Nos. 20-08-03 and 20-08-03RE01, both of the EDCs initiated administrative appeals of both decisions in the Superior Court. OCC has intervened in all four appeals and continues its advocacy to ensure that PURA's Final Decision regarding the EDCs' storm performance is upheld and that the fines assessed to the EDCs are returned to their customers via a line-item bill credit. See *The Connecticut Light & Power Company v. Public Utilities Regulatory Authority*, HHB-CV21-6066605-S; *The Connecticut Light & Power Company v. Public Utilities Regulatory Authority*, HHB-CV21-6067799-S; *The United Illuminating Company v. Public Utilities Regulatory Authority*, HHB-CV21-606787-S; *The United Illuminating Company v. Public Utilities Regulatory Authority*, HHB-CV21-6066639-S. Eversource subsequently withdrew its appeals as part of a comprehensive settlement in Docket No. 17-12-03RE11. UI continues to litigate; OCC filed its brief in August of 2022 with oral argument scheduled for September.
- *Yankee Gas Services v. PURA*, HHB-CV22-6073770-S. Following PURA's Final Decision in Docket No. 21-08-24, YGS appealed certain aspects of PURA's wind-down of the gas expansion program. OCC has intervened in this case to support PURA's wind-down of the program, which is of substantial benefit to gas ratepayers and aligns with the state's carbon reduction goals.

III. Federal Energy Advocacy: OCC continued to be involved this fiscal year with numerous cases at FERC and in the federal courts. Of note:

- OCC continued to participate in the years-long litigation (FERC Docket #s EL13-33 EL14-86, and EL16-64) involving the investment returns earned by the high-voltage transmission lines by utilities in New England.
- In FERC Docket No. RM20-10, the FERC issued a Notice of Proposed Rulemaking that would provide additional incentives to transmission owners. OCC joined in Written Comments filed by the other Connecticut agencies and other New England state entities opposing the proposed rulemaking, arguing that transmission owners are already justly compensated for their infrastructure investments and that the incentives detailed in the proposed rule would provide no additional corresponding value to ratepayers. A Supplemental Notice of Proposed Rulemaking (the "Supplemental NOPR") was issued on

April 15, 2021, to which the OCC joined with the Connecticut Office of the Attorney General in comments. OCC remains involved in this proceeding moving forward.

IV. Office of State Broadband – Telecommunications and Broadband

a. PURA Dockets

- In Docket No. 19-01-52RE01, *PURA Investigation of Developments in the Third-Party Pole Attachment Process – Make Ready*, OCC advocated for the establishment of a one-touch make ready process to enable pole attachers to obtain access to utility poles more expeditiously and cost-effectively. PURA adopted many of OCC’s positions in its final decision.
- In Docket No. 03-03-07RE01, *DPUC Review Of Public Utility Structures And Poles Within Municipal Rights Of Way – Compliance Review*, PURA and OCC continue to monitor the performance of pole owners to remove double poles from public streets and highways.
- In Docket No. 21-07-26, *The Public Utilities Regulatory Authority Annual Community Access Support Review*, PURA established the 2022 inflation-adjusted amount of community access support required from subscribers and each multichannel video programming distributor (MVPD). As requested by the OCC, the Authority also ordered additional funding to support independent Community Access Providers (CAPs) due to the loss of subscribers due to “cord cutting” to bolster financial support. Throughout the proceeding, OCC had to counter arguments raised by the cable industry in opposition to increases in community access support in excess of the inflation-adjustment. During discovery and hearings, OCC discovered that the cable companies may have been underreporting subscribers in multiple dwelling units that has caused a loss of funding support for community access. OCC also worked with the Energy & Technology Committee on a related legislative proposal that, as enacted, requires PURA to undertake a legislative study of PEG access funding and operations.
- In Docket No. 21-07-29, PURA is establishing a process so that pole attachers may make a “single visit” to transfer attachments when a utility pole is being replaced, again to effectuate a more expeditious and cost-effective, as well as safe, transfer of facilities. In Docket No. 21-11-05, PURA opened an investigation into complaints received about unsafe utility poles. As a result of this proceeding, and with OCC’s participation and input, PURA established uniform state-wide processes for the ascertainment of unsafe utility poles and the removal of any poles deemed to be unsafe. The OCC accordingly has been a member of the State-wide Pole Attachment Working Group, which is coordinated by the Education, Outreach and Enforcement Bureau of PURA.
- In Docket No. 21-12-01, *PURA Investigation Into Cablevision Of Connecticut, Cablevision Of Litchfield, And Cablevision Of Southern Connecticut – Compliance With Customer Service Requirements Of Conn. Gen. Stat. § 16-331*, OCC joined with PURA’s EOE division in the investigation of numerous complaints against the Plaintiff for basic customer service violations, most of which took place during the initial quarters of the pandemic. In its June 2022 docket closing letter, the Authority accepted the recommendations of EOE for quarterly compliance filings for six quarters, and further accepted the recommendations of OCC to extend the compliance filings to two years or

eight quarters, which was accepted by the Company. OCC's recommendation to extend filings was based on the magnitude of the complaints lodged.

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- In Docket No. 21-12-21, *PURA Implementation of Process and Procedures for Conduit Excavations for Telecommunications Service Providers and Broadband Internet Access Service Providers*, PURA commenced a proceeding to implement procedures for conduit excavations for telecommunications and broadband providers, as required by Public Act 21-159. The issues are complex due to the number of participants, which include all municipalities, utilities, cable companies, telecommunications service providers and broadband service providers. OCC is playing an active role in the proceeding due to its impact on broadband deployment. A final decision is currently scheduled for February 2023.
- In Docket No. 21-07-28, *OCC Request to PURA to Open Docket Re: PEG Access Consolidation Norwich & Old Lyme*, OCC petitioned PURA to open an investigation into Comcast's proposed merger of its community access operations in its Norwich and Old Lyme Service Areas. Comcast had merely filed an undocketed letter advising PURA of the consolidation of the community access facilities and operations without seeking prior approval as had been the practice. In response to OCC's request, PURA opened a docket and its EOE Division conducted a thorough review of the proposal before recommending that PURA approve the consolidation.
- *Petition for Investigation of Frontier*. During the summer of 2021, OCC received information that Frontier Communications, without any formal notification to PURA, OCC, or the Energy & Technology Committee, was no longer offering its version of cable television, called Vantage TV, to new customers and instead was directing those customers to subscribe to streaming services such as Dish Network or DirecTV. Based on the information, the discriminatory impact of denying its Vantage TV to new customers, and the potential loss of important television services like community access and CT-N, OCC petitioned PURA to open an investigation into Frontier's unilateral and unprecedented decision to cease offering Vantage TV to new customers. Although a docket was established, Docket No. 21-09-07, *Petition of Office of Consumer Counsel for an Investigation into Video Services Offered by The Southern New England Telephone Company d/b/a Frontier Communications*, PURA ultimately declined to open the investigation.

b. Federal Communications Commission

- In FCC Docket No. WC 21-450, In the Matter of Implementation of the Affordable

Connectivity Program, in December 2021, Office of State Broadband (OSB) filed reply comments to support effective enrollment processes, eligibility requirements, transition from the predecessor program to the current, bulk purchasers, and on the development of consumer protections and a robust complaint process. In July 2022, OSB also responded to a Notice of Proposed Rulemaking (“NOPR”) with comments in the same docket, which focused data collected from households enrolled in the program and participating internet service providers. OSB advocated for increased protection of consumer's personally identifiable information as well as urging the FCC to continue its practice of only granting protective status of provider's proprietary information when strict conditions are met. Finally, OSB recommended the FCC heighten its internal security measures to avoid cyber-crimes and inter-agency leaks.

- In FCC Docket No. RM 21-69, *Implementing the Infrastructure Investment and Jobs Act: Preventing Digital Discrimination*, OSB provided both a response to the NOPR and reply comments advocating for a uniform legal approach to claims of digital discrimination and the adoption of a model policy developed in California. OSB also advocated for sufficient resources to enforce digital discrimination regulations, including permitting local enforcement. In its reply comments OSB supported measures to evaluate and track claims of digital discrimination set forth by other stakeholders as well as strict scrutiny of providers that claim exemptions from digital discrimination regulations. OSB also brought to highlight legacy state laws that may contribute to digital discrimination, such as those that eliminated franchise requirements.
- In FCC Docket No. CG – 22-2, *In the Matter of Empowering Broadband Customers Through Transparency*, OSB submitted joint comments with Office of Telecommunications and Broadband in response to a NOPR related to broadband “nutrition labels,” which are being designed to provide consumers with sufficient information to make informed plan choices when shopping for broadband services. The Offices advocated for standardized and transparent for households to have when considering Internet Service Providers.

V. Legislative Advocacy:

The Office of Consumer Counsel actively participated in the 2022 legislative session, preparing written testimony on numerous energy, water, broadband and telecommunications-related proposals and with Consumer Counsel Coleman testifying orally at all Energy & Technology Committee hearings and one Housing Committee hearing. This testimony included:

- S.B. 10, *An Act Concerning Climate Change Mitigation*. OCC supported this Governor's bill which establishes the goal of achieving a zero-carbon electric supply by January 1, 2040 and dovetails with the State's greenhouse gas emissions targets codified in General Statutes 22a-200a. Although supportive of the bill and its objectives, OCC advised on the potential ratepayer impact and advocated for the State seek alternative non-ratepayer sources of funding for the initiative, such as from the IJA and other federal programs.
- S.B. No. 91, *An Act Requiring The Department Of Energy And Environmental Protection To Report On Battery Storage Technology*. OCC supported the raised bill in which the Department of Energy and Environmental Protection is to study the environmental impact of the acquiring of minerals for battery production as well as the impact of their disposal.

As battery storage deployment is a state priority, OCC fully supports the need to be fully prepared to address all aspects of deployment from production to disposal.

- S.B. No. 94, *An Act Concerning Certain Modifications To Gas Pipeline Processes* OCC supported this bill as it was in the best interest of public safety. The bill proposed to expand the current jurisdiction of the Public Utilities Regulatory Authority (PURA) to include certain gas transportation entities and sought to provide PURA with meaningful inspection and enforcement powers over such entities.
- H.B. No. 5117, *An Act Concerning Electric Vehicle Charging Stations* OCC supported the raised bill because it sought to help to ensure that our state's EV Charger deployment goals are equitably distributed among all Connecticut residents, including renters, and that the ratepayers who are funding the deployment program will directly enjoy its benefits. OCC also proposed language changes in the interest of consumer protection to remedy possible inequitable or disproportionate charges from landlords to tenants.
- H.B. No. 5324, *An Act Concerning Residential Solar Photovoltaic Systems Solicitations And Real Estate Transactions Involving Solar*. OCC supported the raised bill to require electric distribution companies (EDCs) to design residential solar customer bills to state their total generation during the billing period as well as the amount of excess power sold back to the grid. OCC's support was based on the bill's purpose, which would empower residential solar customers to understand the performance and benefits of their own solar systems, and ensure that their electricity charges are accurately offset by their energy contributions to the grid.
- H.B. No. 5327, *An Act Concerning Energy Storage Systems And Electric Distribution System Reliability*. OCC opposed the raised bill out of concern that it would eliminate any competition in front of meter (FTM) storage system deployment and potentially increase costs. Additionally, the bill did not consider valuable considerations from applicable PURA dockets, that were in the process of designing a framework for evaluating non-traditional grid investments in lieu of traditional distribution system capacity upgrades in order to meet distribution system needs. OCC proposed changes to the bill that would mitigate the issues it raised.
- S.B. No. 275, *An Act Concerning Economic Development Tariffs*. OCC opposed the bill as drafted because it would have resulted in narrowing the authority provided to PURA in the Take Back the Grid Act, Sept. Sp. Sess. P.A. 20-5, S. 5, codified as Gen. Stat. § 16-19zz, in which the legislature authorized PURA to initiate a docket to investigate an ED tariff – an investigation which is currently still in the early stages. OCC suggested that development of an economic development rate remains best suited to a full investigation with PURA without specific limitations as proposed in the raised bill. OCC recommended changes to the raised bill to remedy its concerns.
- H.N. No. 5326, *An Act Concerning Residential Solar Photovoltaic Systems Solicitations and Real Estate Transactions Involving Solar*. OCC supported the bill's goals, which would have established important consumer protection standards for residential solar marketers and providers. OCC suggested that rather than passing the proposed language, the issue be explored further by opening a docket at PURA, which would allow lessons to be gained from historical third-party supplier problems and allow for full stakeholder input

to establish appropriate standards.

- S.B. No. 276, *An Act Concerning The Regulation Of Water Companies*. OCC supported the raised bill which sought to implement several changes to the ratemaking standards and processes in our state applicable to water companies, to mirror standards already applicable or proposed for electric distribution companies or local gas distribution companies.
- S.B. No. 176, *An Act Concerning Shared Clean Energy Facilities*. OCC supported the increase in the SCEF cap from 20MW per year to 35MW per year, especially if nameplate capacity for the generation sites were to also increase from 2MW5MW. OCC believed this could result in larger SCEF projects and that the state would benefit from economies of scale to deploy more solar with less ratepayer impact. OCC also supported this bill in furtherance of priorities established by PURA, where the majority of this increase is designated to low-income subscribers and environmental justice communities to allow access to clean energy to households that have not traditionally had access to it.
- H.B. No. 5203 *An Act Concerning Utility Company Cost-Sharing Mechanisms* OCC supported the goals of this bill and s to implement several significant changes to the ratemaking standards and processes before the Public Utilities Regulatory Authority (PURA), and made recommendations to the Committee regarding the language proposed.
- S.B. No. 177, *An Act Concerning Grid Resilience*. OCC supported the study bill to ensure Connecticut has the energy and telecommunications infrastructure to withstand the extreme weather impacts of climate change, the growing threat of cyber-attacks, and that we have appropriate resiliency metrics in place to guide the deployment of advanced technologies on the electric grid. OCC recommended that the bill clearly define for PURA its goals and objectives to ensure that it is not duplicative of these ongoing grid modernization proceedings, and that state resources and ratepayer funds are utilized cost-effectively
- H.B. No. 5201, *An Act Concerning Public Health Concerns In The Acquisition Of Water Companies*. OCC Strongly supported this bill to require PURA, in consultation with the Department of Public Health (“DPH”), to consider public health concerns, such as compliance with public health standards as monitored and enforced by DPH, in its consideration of whether the costs of improvements to and the acquisition of a water company are just and reasonable.
- H.B. No. 5202, *An Act Exempting Existing Nuclear Power Generating Facilities In The State From The Nuclear Power Facility Construction Moratorium*. OCC supported enabling Connecticut to be able to secure federal funding that may be available to help the state transition to carbon-free energy. OCC recommended that the bill clarify that any specific nuclear project must be thoroughly evaluated in terms of safety, resiliency, and cost by the legislature, with input from PURA and relevant state agencies, to guarantee that any specific projects would be in the best interest of both ratepayers and the public at large.
- S.B. No. 278, *An Act Concerning A Study of Community Access Operations*. OCC strongly supported the raised bill as requisite step to ensure sufficient funding for community access operations would be available to allow Community Access Providers to serve their communities and all consumers within such communities. OCC supported efforts to restore the “one household/one access fee” funding principle established by the legislature when community access funding was established by statute, which has been depleted in recent

years due to the increase of streaming services.

VI. Representation on Key Organizations, Committees, Boards and Working Groups

OCC staff serve on numerous state, regional, and federal boards, and organizations. They also continue to be in great demand as speakers and participants at national conferences and meetings, regional panels, Connecticut organizations, and other forums. OCC highlights the following membership and participation on:

- The Commission on Educational Technology (CET), the governance board of the Connecticut Education Network and other fiber network infrastructure managed by the state.
- The Low-Income Energy Advisory Board (“LIEAB”), which helps in the planning, development and implementation of energy-assistance programs, and low-income weatherization programs and policies.
- The Energy Efficiency Board (“EEB”), which serves Connecticut ratepayers through the programs it offers that reduce energy demand and acts as a first line of defense against high winter energy prices.
- The Coordinating Committee for the Consumer Liaison Group (“CLG”), a New England-wide entity which hosts public forums on a quarterly basis to consider significant topics affecting electricity consumers, with a particular focus on high-use commercial and industrial customers.
- The New England Power Pool (“NEPOOL”), NEPOOL meetings are often attended by nearly 100 representatives of various electric industry participants, including utilities (privately-owned and publicly- owned), power plant owners (renewable, fossil, and nuclear), demand response developers, retail suppliers, heavy industrial users, and parties that serve the public interest (like OCC). OCC is the sole Connecticut agency that is a voting member of NEPOOL, which functions almost as a quasi-legislature, with proposals, votes, coalitions, and the like. The recommendations of NEPOOL stakeholders do not generally bind the grid operator, ISO New England, but often, the views of a clear majority of NEPOOL stakeholders usually hold sway in the region or at FERC.
- The Consumer Advocates of New England (CANE), a working group consisting of representatives from each ratepayer advocacy office in the New England states to promote coordination and identify issues relevant to all state offices.
- The National Association of State Utility Consumer Advocates (NASUCA), including the water, gas, consumer protection, telecom, and electric Committees. OCC’s staff also attended numerous virtual trainings, conferences, and discussions with community groups, and participated in-person, including a presentation by an OCC staff attorney, at NASUCA’s Mid-Year Meeting in Indianapolis.
- Lawyers Collaborative for Diversity (“LCD”) board member, which consists of law offices and organizations throughout Connecticut and seeks to advance the overall diversity of the legal profession.
- PURA Interconnections Working Group, comprised of various government and private stakeholders, designed to facilitate and streamline the interconnection process in

Connecticut.

- PURA Interoperability and Managed Charging Working Groups, which comprised of electric utilities, electric vehicle industry representatives, and other state agencies for the purposes of recommending guidelines for both integrating electric vehicle charging equipment into Connecticut’s electric grid, and implementing managed vehicle charging standards.

VII. Outreach and Education:

- *Third Party Electric Suppliers.* Each month the OCC examines and analyzes 3rd party electric supplier compliance data and produces a “Monthly Supplier Fact Sheet,” which is posted regularly on the OCC website. This fact sheet reports on the state of the residential electric supplier market in Connecticut and the impact it is having on customers with 3rd party electric suppliers. Many metrics can be derived from this data, but three important ones stand out. The first of these metrics is the percentage of customers paying more or less than the EDC standard service rate. The second is how much savings or overpayments customers, as a whole, experienced for a particular month. The final metric is a big picture view of the impact of electric suppliers on customers. It examines how much savings or overpayments customers experienced on a rolling year basis. The OCC uses this report as a tool to help inform Connecticut customers about competitive supply and the impact it can have on their bills. The OCC Fact Sheets show that for the last fiscal year, Connecticut ratepayers with a third-party electric supplier overpaid by \$ 17,723,756. Since OCC started tracking supplier data on January 2015, ratepayers with a third-party supplier have overpaid by \$304,505,667.
- *Consumer Education & Outreach.* OCC regularly issues “Consumer Alerts” on critical topics and advising regarding changes to utility rates and service to ensure customers are informed about all changes that impact them.

Information Reported as Required by State Statute

OCC has complied with all state requirements regarding affirmative action and equal opportunity, most particularly Conn. Gen. Statutes §§ 46a-70 through 46a-78, and is in compliance with all other applicable federal requirements.

For further information on OCC activities, visit the OCC website at <https://portal.ct.gov/occ>

