

January 12, 2015

Nicholas E. Neeley
Acting Executive Secretary
Public Utilities Regulatory Authority
Ten Franklin Square
New Britain, Connecticut 06051

Re: PURA Investigation Into Redesign of the Residential Electric Billing Format
Docket No. 14-07-19

Dear Mr. Neeley:

Consumer Counsel Elin Swanson Katz ("Consumer Counsel") and George Jepsen, Attorney General for the State of Connecticut ("Attorney General"), hereby submit the instant joint letter in lieu of written exceptions to the draft decision issued by the Public Utilities Regulatory Authority ("PURA") in this proceeding (the "Draft"). The instant proceeding was held in order to implement the provisions of Public Act ("PA") 14-75, Section 1(a)(2) ("Section 1(a)(2)"), which require that the first page of the electric bill be redesigned to provide certain customer specific electric generation pricing information. The Consumer Counsel and the Attorney General strongly support the Draft and urge its adoption, with one minor clarification noted below. Neither party requests oral argument in this matter, but both parties reserve the right to participate in oral argument should another party request it.

The Draft requires that customers be notified, on the first page of their electric bill, of critical price-related information as required by PA 14-75, including the generation rate they are paying, the generation rate they will be charged in the upcoming month and the price they would have paid had they been on standard service. The Draft also requires timely compliance with the statutory mandates.

One of the primary issues in this docket was how to implement the plain language of Section 1(a)(2)(B)(iii), which requires that "any change to a customer's electric generation service rate for the next billing cycle" be disclosed on the current month's bill. Both the Consumer Counsel and the Attorney General argued that PA 14-75 effectively ended the

practice of rates changing on a daily or weekly basis because such changes would not allow for advance notice to customers on the bill. PURA agreed, stating that daily and weekly variable rates will only be permitted to be charged until the effective date of implementation of the required bill changes. Draft, 6. At that time, daily and weekly variable rates will be prohibited, and customers will receive notice on their bill of their rate for the upcoming month, as clearly required by the legislature in PA 14-75, Section 1(a)(2). Id.

The Draft also requires that the EDCs and suppliers comply with the requirements of PA 14-75, Section 1(a)(2) by July 1, 2015, as required by the legislature. It is important that PURA hold to this legislatively imposed deadline. Customers deserve the benefits of PA 14-75 as soon as possible so that they can decide whether and how to participate in the electric supply market in a fully informed manner.

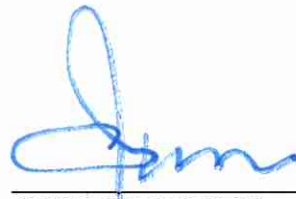
The Consumer Counsel and the Attorney General do request one minor modification to the Draft. Specifically, the Draft provides that the costs of compliance with Section 1(a)(2) will be recovered by CL&P and UI “in the next semi-annual adjustment to the NBFMCC proceeding.” Draft at 11. The Draft further provides that “[a]ll costs are subject to prudence review by the PURA.” Id. However, the Draft does not specify that the prudence review will occur in the NBFMCC proceeding in which the costs are to be recovered. While this is implied, the Consumer Counsel and the Attorney General request that specific language be added to the Draft to this effect.

Both the Consumer Counsel and the Attorney General commend PURA for issuing a Draft that implements both the plain language and the intent of PA 14-75 and that recognizes the important public policy reasons for doing so.

Sincerely,



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cc: Service List