



# CT Roundtable on Climate & Jobs



September 12, 2016

VIA E-FILING AND U.S. MAIL

Jeffrey R. Gaudiosi, Esq.  
Executive Secretary  
Public Utilities Regulatory Authority  
10 Franklin Square  
New Britain, CT 06051

**Re: Docket No. 16-06-04**

*Application Of The United Illuminating Company To Increase Its Rates And Charges*

Dear Mr. Gaudiosi:

The CT Roundtable on Climate and Jobs files this comment in the above-referenced docket on behalf of the organizations listed below. We thank the Public Utilities Regulatory Authority (PURA) for this opportunity to participate in this important rate case proceeding.

Most of the groups signing this letter were part of a broad coalition that helped win state legislation in 2015 to halt a decade of increases in monthly fixed charges for CT's electric customers. Residential customers had seen their monthly fixed charge more than double in a decade (2004-2014), resulting in the highest (Eversource; \$19.25/mo) and second highest (UI; \$17.25/mo) in New England for any major utility. Meanwhile, Eversource customers in Massachusetts continue to pay fixed charges less than \$7/month.

Connecticut's legislators recognized the need for change, and they passed a law clearly limiting what costs can be included in the fixed charge: "...only the fixed costs and operation and maintenance expenses directly related to metering, billing, service connections and the provision of customer service" (Conn. Gen. Stat. § 16-243bb). The current rate case for United Illuminating (UI) is the first test for enforcement of this new law and will establish a precedent affecting ratepayers throughout the state.

We strongly support expert testimony prepared by Scott J. Rubin on behalf of the Office of Consumer Counsel, providing an analysis of UI's cost-of-service study (COSS). Mr. Rubin

concludes that, under the law, a unified customer charge for residential classes R and RT should be \$7.63 per customer per month, a reduction of almost \$10.

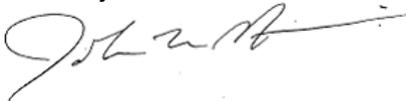
Acadia Center, one of the signatories to this letter, has performed a similar analysis and determined that the reasonable range for UI's monthly residential fixed charge for Rate R customers would be \$6.04 to \$7.95, depending on the treatment of different costs under the new law. As more information comes out during the rate case, these calculations could change and the results could move even lower.

Reducing the fixed charge to satisfy the law would also serve the public interest:

- it would give residential consumers greater control over their energy costs by making a greater proportion of the bill directly tied to energy use;
- it would relieve an undue burden on low-income residents, most of whom use less energy than the average customer and would therefore see a reduction in their monthly bill;
- it would enhance the incentives for energy efficiency and rooftop solar, which are critical elements of the state's plan for achieving its climate goals; and
- it would encourage the expansion of a clean energy sector that provides green jobs for workers right here in Connecticut.

**We strongly encourage PURA to conduct a rigorous review of United Illuminating's cost claims, calculations, and methodology to ensure that all costs outside the scope of state law have been removed from the residential fixed charge.**

Sincerely,



John Humphries, Organizer  
CT Roundtable on Climate and Jobs  
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**Joined by the following groups:**

Acadia Center  
Clean Water Action, Connecticut  
Connecticut AFL-CIO  
Connecticut Alliance for Retired Americans  
Connecticut Conference, United Church of Christ

Connecticut Education Association  
Connecticut Fund for the Environment  
Connecticut State Council of Machinists  
ConnPIRG  
Conservation, Energy & Environment Committee of Bloomfield  
Cornwall Energy Task Force  
Eastern Connecticut Green Action  
Enviro Energy Connections  
Environment Connecticut  
Fight the Hike  
GEU-UAW Local 6950  
Greater Hartford Labor Council  
Institute for Sustainable Energy at ECSU  
Interreligious Eco-Justice Network  
The Jonah Center for Earth and Art  
New Haven/Leon Sister City Project  
New Haven Peoples Center  
People's Action for Clean Energy (PACE)  
PT Barnum Resident Council  
PT Partners  
SEIU Connecticut State Council  
Sierra Club - Connecticut Chapter  
Solar Connecticut  
Sun-Wind Solutions  
350 CT  
Town of Bloomfield