



## **The Energy and Technology Committee**

**Public Hearing, March 7, 2013**

**Office of Consumer Counsel**

**Elin Swanson Katz, Consumer Counsel**

Testimony of Elin Swanson Katz

***S.B. 1037, An Act Concerning the Procurement Plan, Integrated Resources Plan and Comprehensive Energy Strategy and Minor and Technical Revisions to the Utility Statutes***

This bill is one of several bills on the agenda for this Committee's consideration today which propose clarifications to the roles of the Department of Energy and Environmental Protection (DEEP) and the Public Utilities Regulatory Authority (PURA), and the proceedings which they conduct. The Office of Consumer Counsel (OCC) supports this bill with two suggested revisions, as provided below.

In Section 1, language that currently exists in a somewhat different form in Sections 16a-3a(h) and 16a-3d(e) is proposed to be moved to Section 16-2(m). As noted in OCC's testimony on S.B. 839, which contains a similar change, the proposed language does not include the existing requirement that PURA's decisions also be based on the evidence in the record of each proceeding. In order to provide due process to all parties to a proceeding and to ensure that the basis for any decision is properly supported by the record before the Authority and adequately articulated in its decision, this language should be included in the proposed revisions to Section 16-2(m).

Section 9, line 174, contains a change to Section 16a-3a, the Integrated Resources Plan (IRP) statute, which would require the IRP to meet the projected requirements of customers in a manner that minimizes the cost of “all energy” resources to customers, rather than just electric resources. It is unclear what is intended by this change other than to allow for cross-subsidization of non-electric fuel use by electric ratepayers, which OCC believes should be either disallowed or, at most, minimized. This issue is discussed in more detail in OCC’s testimony on G.B. 6360, and OCC refers the committee to its testimony on that bill regarding this issue. OCC suggests that the bill be amended to remove this proposed language.

OCC looks forward to a continued dialogue with members of the Committee, DEEP and other parties regarding this bill and others that address similar issues.