

# Northeast Energy Efficiency Partnerships, Inc.



## Delivery via Email

March 13, 2009

The Honorable Gayle S. Slossberg  
Co-Chair, Government Administration and Elections Committee  
Legislative Office Building  
Room 2200  
Hartford, CT 06106

## RE: SB 840 Eliminating the Office of Consumer Counsel

Dear Co-Chair Slossberg,

I'm writing you in advance of the hearing scheduled to consider SB 840, legislation that would eliminate the Office of Consumer Counsel ("OCC"), and transfer many of the OCC's duties to the Attorney General. NEEP understands the looming deficit Connecticut faces, but asks you to consider what eliminating the OCC will cost Connecticut citizens and ratepayers, while doing little to solve Connecticut's deficit challenge.

Based in Lexington, Mass., Northeast Energy Efficiency Partnerships ("NEEP")<sup>1</sup> is a nonprofit organization founded in 1996 whose mission is to promote the efficient use of energy in homes, buildings, and industry in New England, New York, and the Mid-Atlantic states through regionally coordinated programs and policies that increase the use of energy efficient products, services and practices, and help achieve a cleaner environment and a more reliable and affordable energy system. Working in partnership with environmental and consumer groups, state and federal agencies, businesses, utilities and other non-profits, NEEP supports government policies, offers training programs, and coordinates regional initiatives that promote and build market adoption of quality energy efficient products and services.

As a regional entity, NEEP works with several states with different types of consumer advocacy offices. Several, including Maine, New Hampshire, and Connecticut, have specific state agencies whose sole responsibility it is to represent the best interests of those states' utility consumers. Currently, utility ratepayers fund the OCC through a charge on their electric, gas, and other utility bills. As such, **the charges collected to fund the OCC come from utility ratepayers, and have no impact on the general fund, or tax revenue.**

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<sup>1</sup> These comments are presented by NEEP staff, and do not necessarily reflect the views of NEEP's Board of Directors, sponsors, or underwriters.

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The OCC, which has been in existence with a staff of under 20 since 1975, provides direct value to the state's utility consumers. In its 2008 Report to the Governor, OCC reported that its actions had saved utility consumers \$500 million between July 2007 and July 2008.<sup>2</sup> And while SB 840 shifts many of the OCC's duties to the Office of Attorney General, which will certainly do its best to represent utility consumers, it is impossible for the Attorney General to replace the accumulated experience that 33 years has brought to the OCC during its existence. And the timing could not be worse; while the current recession continues to worsen month by month, and, by the roughest of accounts, will take two to three years to overcome, if SB 840 becomes law, the utility consumers of Connecticut will be dealing with a new advocate on their behalf with good intentions, but without the same direct experience in direct utility consumer representation, which does not bode well during times of such volatility in the utility industry.

Therefore, NEEP respectfully requests that the Assembly considers these and other relevant factors before taking an action that will not only eliminate an office that has a long and successful record of standing up for Connecticut's ratepayers, but will do little, if anything, to close Connecticut's budget gap.

Sincerely,

*Douglas Denny-Brown*

Douglas Denny-Brown  
Manager of Public Policy Outreach

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<sup>2</sup> [http://www.ct.gov/occ/lib/occ/year\\_end\\_08\\_\(09\)final.pdf](http://www.ct.gov/occ/lib/occ/year_end_08_(09)final.pdf)