

TESTIMONY OF
UIL HOLDINGS CORPORATION
Before Committee on Energy and Technology
On
Legislative Office Building
March 5, 2013

**SB 109 - AN ACT CONCERNING NOTIFICATION TO MUNICIPALITIES OF
TERMINATION OF A CUSTOMER'S UTILITY SERVICE.**

Good afternoon Senator Duff, Representative Reed and members of the Energy & Technology Committee. My name is Laura Gonzalez, Director of Credit and Collections at The United Illuminating Company and I am submitting these comments on behalf of UIL Holdings Corporation (“UIL”) and its operating companies, The United Illuminating Company (“UI”), The Southern Connecticut Gas Company (“SCG”) and Connecticut Natural Gas Corporation (“CNG”), collectively, (the “Companies”) regarding **Proposed Senate Bill 109 AN ACT CONCERNING NOTIFICATION TO MUNICIPALITIES OF TERMINATION OF A CUSTOMER'S UTILITY SERVICE.**

The Companies oppose Proposed Senate Bill 109. The Bill would require an electric, electric distribution, gas or water company to provide notice to a chief elected official of a municipality when a customer of such utility is without utility service for more than seven continuous days.

The Companies understand the intent of the Bill is to aid the municipalities in assisting its citizens in the event that utility service is disconnected for an extended period of time. The

Companies applaud the intent of the Bill and fully supports that goal. However, the Companies have concerns with respect to its customer's privacy rights, safety, and the administrative complexities involved in providing such a notice.

Involuntary disconnections of utility service are usually the result of non-payment. The Companies believe that disclosing to any party other than the customer of record that a disconnection has occurred would be an invasion of privacy. The Companies do not release any private customer information without the consent of the customer of record or other documents that compel disclosure of such information like a subpoena.

The Companies are also concerned that providing disconnection information to a municipality could have larger privacy and disclosure implications. If private customer information is delivered to a municipality there is the potential that this information could later become a part of a Freedom of Information Act request made to a municipality. This would be of serious concern to the Companies as they take great efforts to protect private consumer information entrusted to them by their customers.

The Companies are also concerned with the possible inadvertent disclosure of private customer information. Once the Companies disclose to a municipality that a home no longer has utility service the Companies cannot control who has access to that information. Any inadvertent disclosure by a municipality could present an opportunity to those who would use this information to unlawfully access a home knowing that home does not have utility service or

may be vacant. These are all clearly unintended consequences of disclosure, thwarting the very intent of this proposed Bill.

The Companies are also concerned with the significant administrative issues and costs associated with communicating to municipalities the 100,000 plus service terminations performed by the Companies each year. For UI, 12% of the 50,000 service terminations were not reconnected within 7 days in the calendar year, 2012. Notwithstanding the municipalities' capacity for practically acting upon this sheer volume of information (to which only the municipalities could add insight), the Companies would have to develop and maintain the systems to make such notice readily available to each of the towns in their service territories. UI serves approximately 17 towns; SCG and CNG each serve 22 towns. Creating the mechanisms for such notices, as well as the processes for continuously updating the database as contact information within those municipalities' changes over time, would require time, resources and coordination amongst the utility companies and the municipalities. Transmitting the information timely, accurately and securely would be paramount.

For the above reasons the Companies oppose proposed Senate Bill 109. The Companies thanks the Energy and Technology committee for this opportunity to present this testimony and I am available to answer questions you may have.