



February 20, 2014

Dear Members of the Energy and Technology Committee:

The Retail Energy Supply Association (RESA) is the nation's leading association of competitive energy suppliers dedicated to creating and sustaining vibrantly competitive electricity and natural gas markets for the benefit of consumers. RESA is a trade association comprised of 20 competitive energy suppliers who are actively involved in supplying competitive electric and natural gas products across the country, including customers in Connecticut. RESA appreciates the opportunity to comment on Senate Bill 2, a bill working to provide an online database for consumers to purchase electricity as well as enhance disclosures from suppliers.

As a general matter, RESA supports the main purpose of Senate Bill 2; we believe consumer education is vital to a thriving competitive market. RESA, however, is concerned that some additional measures under consideration may be unnecessary and may impose additional costs on consumers and unreasonable restrictions and compliance burdens on retail suppliers.

Regarding the shopping comparison website, RESA would like to assist the Department of Energy and Environmental Protection with the establishment of an online market place where consumers can compare offers from various suppliers. We think it will provide consumers with even more information about their options, but RESA believes developing this database will be a complex process to ensure it contains current information and does not give one supplier an advantage over another. Other state websites, such as Pennsylvania's [www.papowerswitch.com](http://www.papowerswitch.com), and Texas' [www.powertochoose.com](http://www.powertochoose.com), are great examples.

RESA supports Senate Bill 2's goal of increased consumer disclosures but we are concerned additional regulatory restrictions on suppliers may impose additional operating costs with little incremental benefit to consumer protection. We note Public Act 13-119 went a long way to increase consumer education, including adding a requirement that consumers receive a notice of when a fixed term is expiring and any change it will make to the consumer's rate. The act further requires all advertisements for electricity use 10pt font to indicate the advertised price and the expiration of that price. Existing rules also already require the following consumer protections:

- full disclosure of contract terms and conditions
- verifiable and documented authorization for customer enrollments
- a penalty free, rescission window for residential and small business customers
- notice requirements when a contract expires and anytime the supplier proposes changes to the contract
- prohibitions against any deceptive, misleading or unfair marketing, advertising or trade practices

RESA favors comprehensive enforcement of these existing regulatory requirements. RESA notes the PURA currently has a broad proceeding open looking at retail supplier marketing practices. RESA believes this proceeding is the best venue to explore whether additional consumer disclosures or regulations of supplier marketing practices are necessary. RESA appreciates the Committee's concerns regarding violations of the Do Not Call List, but currently the PURA has authority to establish penalties for any violations as an unfair or deceptive practice. RESA encourages the General Assembly to set aside additional resources for the PURA. We believe more staff PURA strictly enforce consumer protections already in statute resulting in additional compliance.

RESA recommends that, if any incremental supplier regulations are adopted, the Committee should limit any new customer protections to residential customers. Commercial customer contracts can be very complex and often include product offerings specific to individual customer needs. Any new requirements on commercial contracts may interfere with a business's ability to get the lowest possible rate available. We believe that by limiting new consumer protections to the residential community the Committee will be able to protect the residential customers without any unintended consequences on the business community.

Thank you for your consideration. RESA hopes we can work with the committee and further provide you with some insight we have gathered through our experience in the industry and working in deregulated states across the nation.

Thank you for your time.

Sincerely,

Melissa Biggs

RESA's members include: AEP Energy, Inc.; Champion Energy Services, LLC; ConEdison *Solutions*; Constellation NewEnergy, Inc.; Direct Energy Services, LLC; GDF SUEZ Energy Resources NA, Inc.; Homefield Energy; IDT Energy, Inc.; Integrys Energy Services, Inc.; Just Energy; Liberty Power; MC Squared Energy Services, LLC; Mint Energy, LLC; NextEra Energy Services; Noble Americas Energy Solutions LLC; NRG Energy, Inc.; PPL EnergyPlus, LLC; Stream Energy; TransCanada Power Marketing Ltd. and TriEagle Energy, L.P. The comments expressed in this filing represent the position of RESA as an organization but may not represent the views of any particular member of RESA.