

Tracey Energy Services

New Haven, CT

I am writing to oppose SB 229, An Act Establishing a Prepaid Consumer Heating Fuel Contract Guaranty Fund.

As owner of Tracey Energy Services, a third generation New Haven fuel oil company established in 1931, while I understand the concern the Legislature has for the past irresponsible, at best, or criminal behavior of a few of my competitors, I do not feel that my company, and my customers, should be penalized for the wrong doings of others. Nor should any other fuel company who either does not offer prepay contracts, or who is fiscally responsible be penalized as well!

I have offered prepay programs for over 10 years, and have always in a responsible and honest manner, as have most of the companies in this industry. A majority of us are family owned business, just like mine, and our name and reputation are as important to us as the fact that the business serves as our livelihood.

The State already has in place requirements, which we follow, which requires fuel oil dealers to cover prepay fuel oil contracts with either paper or liquid product. As a fuel oil dealer, if I choose to offer prepay contracts, I am responsible for securing product for delivery, at an agreed upon price to my customer, with a fair business profit. In general, as an industry of responsible oil dealers, we do not gamble on the market in hopes that the market will fall and we will reap more profit from our prepay customers. And, if we should even consider this concept, the State's current law would prohibit that behavior.

Rather than "taxing" all fuel oil dealers as a result of the failure of just a few, which would then financially affect all oil customers as the cost would most assuredly be passed along to them, I would agree with our Association's recommendations at it pertains to those companies who do **choose to offer a prepay contract** to their customers

- Mandates a Seasonal ban on offering any prepaid contracts for home heating oil, kerosene or liquefied petroleum gas from Nov 1 to March 31.
- Requires mandatory interagency sharing and sending of important flag-raising information – (DRS to DCP all tax arrears and & DOI to DCP all insurance arrears)
- Require open and transparent on-line, real-time public access listing the dealers for CT Consumers (ie: who has filed forms and has provided DCP with evidence of registration and procurement of home heating oil, kerosene or liquefied petroleum gas for the upcoming season as it pertains to prepay contracts)

I hope that SB229 is reconsidered by Connecticut Legislature and that the State puts into effect the law that is currently on the books.

Respectfully,

Jennifer A. Tracey-Carlo
Owner