



The Energy and Technology Committee

Public Hearing, February 24, 2015

Testimony of

Consumer Counsel Elin Swanson Katz

Presented by Consumer Counsel Elin Swanson Katz

Proposed S.B. 575, An Act Concerning Electric Rate Transparency

Consumer Counsel Elin Swanson Katz and the Office of Consumer Counsel (collectively "OCC") support this bill, which seeks to improve transparency and increase opportunities for public comment in rate cases. With respect to public comment in rate cases, OCC notes that in the past, there were typically several public hearings held throughout the service territory of a utility company seeking a rate increase, depending on the size of the service territory. The number and geographic diversity of public hearings held in rate cases in recent years has declined on average. The Public Utilities Regulatory Authority ("PURA") did hold numerous hearings around the state last year on electric supplier issues, which OCC appreciates, and in OCC's view, those hearings effectively allowed customers to provide key information about the types of issues that they were facing and the economic impact thereof. PURA also held three public hearings within the service territory of The Connecticut Light and Power Company ("CL&P") during its most recent rate case. OCC suggests that at least one public hearing should be held in each county in which a utility requesting a

rate increase operates, so that there is ample opportunity for communication from the public.

OCC also agrees that there are elements to the current rate case process that limit transparency. OCC suggests that a utility requesting a rate increase should be required to make all of the data upon which the utility relies publically available. Too often, utilities hire consultants to do forecasting or modeling, and then claim that the consultants' work is a proprietary trade secret. This practice should not be permitted. Public utilities enjoy all of the financial benefits of a regulated monopoly. Their books and records, forecasts and models should be transparent and available to the public. There should be a strong presumption against confidential treatment, with limited exceptions for the protection of customer information, cyber security, infrastructure protection, and public safety. Most certainly, public utilities should not be permitted to withhold the data that forms the basis of rate case applications behind claims of trade secret protection. We would be happy to work with all parties to generate more specific language to accomplish this end.