PUBLIC COMMENT OPPOSING EVERSOURCE'S PROPOSED CONNECTICUT ELECTRIC DISTRIBUTION RATE INCREASE

Submitted to: Connecticut Public Utilities Regulatory Authority (PURA)

Docket: 26-05-10 — The Connecticut Light and Power Company (Eversource)

Subject: Opposition to the proposed distribution rate increase; request for careful review, transparency, storm-cost accountability, and customer protections

To the Connecticut Public Utilities Regulatory Authority:

I am writing as a Connecticut homeowner, a single parent, and a working middle-class resident who is doing everything possible to stay financially afloat. I oppose Eversource's proposed distribution rate increase as filed and ask PURA to require clear, independent, and meaningful scrutiny before approving any additional amount.

I want to be accurate about what Eversource has requested. The approximately $727 million figure is the total annual revenue deficiency Eversource identifies when storm-related costs are included. The company's filing separately identifies approximately $451 million in additional annual base distribution revenue, before the storm-cost component. The $727 million should therefore not be described as a $727 million annual base-rate increase by itself. The request also involves storm costs from earlier years and a proposed multi-year rate plan. These different components should be reviewed separately, with no duplicate or unsupported recovery.

Even if a rate change is approved now, customers would generally pay the resulting rates in the future. That does not mean all of the underlying costs are future costs. Some amounts Eversource seeks to recover relate to past storms and past spending; other parts of the proposal concern future operating needs and planned infrastructure investment. Customers deserve to know exactly which is which, what has already been spent, what is proposed for the future, and what evidence supports each amount.

I work overtime every week to make ends meet. I own my home, support my family, and work hard to meet my financial responsibilities. Despite working as much as I possibly can, I am barely breaking even between paychecks. Electricity is not a luxury. It is an essential service my family depends on, and I should not have to sacrifice my financial future just to keep the lights on.

I am not writing because I do not want to pay my bills. I am writing because I am tired of working harder, paying more, receiving unresolved explanations instead of solutions, and being expected to accept another increase without seeing meaningful accountability.

1. The middle class is being left behind

One of the biggest problems I see is that there is very little consideration for working middle-class families.

People like me fall into an incredibly frustrating financial gap. We make too much money to qualify for many low-income assistance programs, but we do not make enough money to comfortably afford increasingly expensive utility bills.

We are expected to pay the full amount, absorb every increase, and somehow manage payment arrangements that are simply not realistic. Adding another large payment on top of an already unaffordable monthly bill does not resolve financial hardship. It makes the situation worse.

What options are available to the working middle class? We are not wealthy enough to afford these bills, but apparently not poor enough to qualify for meaningful assistance. There needs to be a middle-income hardship program for households that fall outside traditional low-income eligibility requirements but can demonstrate that utility expenses are financially unsustainable.

2. Existing customer problems must be taken seriously

My concerns with Eversource go beyond the cost of electricity. When I have concerns about my electric meter and believe something may not be right, I have struggled to get Eversource to properly investigate or address those concerns.

When issues involve solar power, customers can be caught between Eversource and the solar companies, with each pointing responsibility toward the other while the actual problems remain unresolved. Customers are left trying to determine who is responsible, who will investigate, and who will fix the problem while the bills continue.

How can Eversource justify asking Connecticut residents for substantially more money when customers are already struggling to get existing service and billing concerns properly addressed? I have yet to see meaningful improvements in my own area that demonstrate the level of investment and work customers are continually expected to pay for.

I am tired of hearing explanations. I want to see actual results.

3. Review the $451 million base-rate request on its own merits

The approximately $451 million annual base distribution revenue request is separate from the storm-cost component included in Eversource's approximately $727 million total revenue-deficiency figure. PURA should examine the base-rate request line by line and require Eversource to demonstrate that each proposed expense and investment is necessary, prudent, efficient, and properly assigned to Connecticut electric customers.

I ask PURA to closely examine, among other things:

- **Operating and maintenance expenses:** the actual historical spending, forecasts, assumptions, staffing and contractor costs, and the reasons for any significant increases.
- **Infrastructure and capital investment:** the projects included in the proposed plan, their purpose, expected cost, timing, alternatives considered, expected customer benefits, and measurable reliability improvements.
- **Vegetation management and storm readiness:** the work completed, the work still planned, the cost per activity, and evidence that the proposed spending is reasonable and not already funded through another rate or recovery mechanism.
- **Rate base and return:** the assets and investment amounts included in the calculation, the proposed return on equity and overall cost of capital, and whether customers would be charged for assets that are not used and useful or otherwise eligible for recovery.
- **Existing customer-funded amounts:** whether prior rates, trackers, reserves, insurance proceeds, grants, storm reserves, or other collections have already paid for or offset any of the same costs.

PURA should not approve a requested amount simply because Eversource says it needs the money. The company has the burden to support its proposed rates with credible evidence and to show that the costs result from prudent and efficient management. I ask PURA to reject, reduce, or defer any amount that is not adequately supported.

4. Separate past storm costs from future rates and prevent double recovery

A significant part of the difference between the approximately $451 million base distribution request and the approximately $727 million total figure relates to storm costs from January 2018 through March 2025. Those are not all new projects that Eversource plans to perform in the future. They are costs the company says it already incurred responding to past storms and related pre-staging activities. Customers may nevertheless pay for approved recovery through future bills.

The storm-cost component also involves different time periods and regulatory processes. Eversource has sought securitization for certain catastrophic storm costs incurred from 2018 through 2023, while costs for catastrophic storms from January 2024 through March 2025 are subject to a separate prudence review proposal. The 2018–2023 storm-cost proceeding has already resulted in a PURA decision approving most, but not all, of the requested expenses; Eversource has appealed aspects of that decision, including the denial of substantial carrying charges. These storm proceedings should not be confused with the separate base distribution rate case now before PURA.

I ask PURA to ensure that any storm-related amount included in or affecting future customer bills is reconciled against the final outcome of the applicable storm proceeding. Customers should not be charged twice for the same expense, should not pay for costs already covered by existing storm reserves or other collections, and should not be required to fund expenses that were disallowed or remain unsupported.

For every storm-cost amount Eversource seeks to recover, the company should provide a clear accounting showing the storm date, work performed, location, labor and contractor charges, materials, invoices, credits or offsets, amounts previously collected, amounts already approved, amounts still disputed, and the exact amount proposed for recovery from customers. PURA should independently test whether the costs were reasonable, necessary, properly documented, and prudently managed.

I also ask PURA to scrutinize any request for interest or carrying charges on delayed storm-cost recovery. Customers should not automatically bear financing costs for delays that may have resulted from late filings, incomplete submissions, or avoidable delays in providing information. Any such charge should be supported by evidence and reviewed for fairness to customers.

5. Future infrastructure spending needs controls, not a blank check

Eversource has also proposed a multi-year rate plan covering July 1, 2027 through June 30, 2031. The plan includes mechanisms that could adjust allowed revenues over time and provide additional recovery for planned capital investment. This is different from reimbursement for a past storm. It concerns future years and future spending assumptions.

I understand that an electric utility must maintain and improve its system and that some legitimate infrastructure costs may be included in rates before a project is fully completed under applicable ratemaking rules. My request is not that PURA prohibit all forward-looking investment or require every ordinary operating expense to be paid only after the fact. My concern is that customers should not be exposed to automatic or insufficiently reviewed increases for projected projects without enforceable safeguards.

For future capital programs and adjustment mechanisms, I ask PURA to require:

1. A defined project list and budget identifying the need, location, scope, estimated cost, schedule, and expected reliability or service benefit.

2. Prior review of material projects and meaningful limits on automatic adjustments, with clear criteria for what qualifies for additional recovery.

3. Regular reconciliation of forecast spending against actual spending, with invoices, work orders, completion records, and explanations for material variances.

4. Independent audits and prudence reviews, including review of whether projects were necessary, reasonably priced, completed as represented, and placed into service.

5. Refunds or bill credits when customers paid more than the verified and approved amount, when projects are canceled or materially reduced, or when costs are disallowed.

6. Public reporting that identifies what was completed, what remains unfinished, how much was spent, and how the work improved service for customers.

Where the law and sound ratemaking practice permit recovery before completion, PURA should require appropriate protections, such as milestone reporting, project-specific tracking, true-ups, and refunds for amounts not ultimately justified. Emergency work may require immediate action, but it should still be documented promptly and reviewed afterward.

Customers should pay for prudent and verified utility costs—not unsupported estimates, duplicate recovery, or projects that are never delivered as represented.

6. Require public financial and infrastructure reports twice a year

If Eversource is asking customers to pay substantially more, customers deserve to know where the money is going. I ask PURA to require public accountability reports at least twice a year, in plain language, including:

- **Actual expenditures:** a breakdown of additional amounts collected and spent, including invoices, contractor payments, and relevant offsets.
- **Project status:** what was repaired, replaced, upgraded, or improved in each Connecticut community, with locations and completion dates.
- **Forecast versus actual costs:** the amount originally budgeted, the amount actually spent, and an explanation of significant differences.
- **Reliability results:** measurable changes in outage frequency and duration, restoration performance, and other service indicators.
- **Customer complaints:** meter and billing complaints received, investigated, resolved, adjusted, and still outstanding.
- **Solar-related disputes:** the number and status of billing and metering disputes and how responsibility was resolved.
- **Independent audits:** audit findings, corrective actions, and whether collected funds were used for approved purposes.

I do not believe customers should have to take a corporation's word that their money is being spent appropriately. If Eversource says it invested in infrastructure, show us the infrastructure. If it says it repaired equipment, show us what was repaired. I want to see receipts, results, and accountability.

7. Establish consequences when costs or promised results are not supported

There should be consequences when a utility collects money for a specific purpose but cannot document the expenses, spends less than forecast, fails to complete approved work, or uses the money for a different purpose without authorization.

I ask PURA to require appropriate refunds or bill credits when amounts collected from customers are later found to be unsupported, imprudent, duplicative, unused, or otherwise not recoverable. Where a utility fails to meet approved performance requirements, PURA should use lawful remedies and require corrective action. If an investigation establishes intentional misrepresentation or fraudulent reporting, PURA should consider all penalties and customer restitution available under its authority.

A company should not be allowed to collect additional money, fail to demonstrate that the costs were justified or that approved work was delivered, and then simply ask customers for even more without meaningful review.

8. Corporate executive compensation and customer hardship

I also want to address executive compensation because it is difficult to ignore the contrast between the financial reality of Eversource's leadership and the financial reality of its customers.

Public reporting indicates that Eversource CEO Joseph Nolan received approximately $13.5 million in adjusted compensation in 2025, reportedly a 19% increase from the previous year. I understand that executive compensation is not necessarily a direct component of this particular rate request, and I am not claiming that every dollar of executive compensation is paid directly from residential rate increases.

I am questioning corporate priorities and accountability. There should be a serious conversation about whether executive bonuses and compensation increases are tied to measurable results, infrastructure reliability, customer service, affordability, and responsible financial management. Customers should not be expected to struggle with essential bills while leadership compensation continues to rise without clear accountability for customer outcomes.

9. My personal financial reality

I am currently behind on my electric bill. I have always made an effort to pay something, even when I could not afford the full balance. I have never simply ignored my responsibility. I have paid what I could manage because I understand that my household needs electricity.

Yet, even after making payments, I have been told that what I can afford to pay is not enough, and I face the threat of having my electricity disconnected because I cannot keep up with one month's bill.

I have reached the point where I have had to withdraw money from my 401(k), money I worked hard to save for retirement, simply to prevent my household from being left without electricity.

A working homeowner who puts in overtime every week should not have to sacrifice retirement savings to maintain an essential utility service. I am not asking for free electricity. I am asking for fair treatment, accurate billing, reasonable payment options, and a utility company that recognizes the financial reality its customers are living in.

There needs to be meaningful assistance for middle-income households that fall outside traditional low-income eligibility requirements but can demonstrate that their utility expenses are financially unsustainable.

10. My requests to PURA

I respectfully urge PURA to:

1. Reject Eversource's application as filed unless and until the company proves that each component is just, reasonable, prudent, and supported by reliable evidence.

2. Evaluate the approximately $451 million annual base distribution revenue request separately from the storm-cost amounts included in the approximately $727 million total revenue-deficiency figure.

3. Require a detailed, independent review of operating expenses, capital spending, rate base, return assumptions, vegetation management, and all proposed adjustments.

4. Reconcile all past storm-cost recovery against the applicable separate proceedings, prior collections, reserves, credits, disallowed costs, and any amounts still disputed; prevent double recovery.

5. Scrutinize any interest or carrying charges sought on past storm expenses and exclude unsupported or inequitable amounts.

6. Place enforceable safeguards on the proposed multi-year rate plan and capital adjustment mechanisms, including project budgets, tracking, audits, actual-cost reconciliation, and refunds where appropriate.

7. Require public twice-yearly reports showing money collected, actual spending, project completion, reliability results, and unresolved customer complaints.

8. Strengthen investigations into meter accuracy, billing disputes, and solar-related problems.

9. Promote realistic payment arrangements and protections for customers making good-faith payments during financial hardship, including middle-income households that do not qualify for traditional assistance.

10. Tie executive performance incentives to measurable improvements in reliability, customer service, affordability, and responsible financial management, to the extent within PURA's authority.

11. Require refunds, bill credits, corrective action, and appropriate penalties when amounts collected are later found to be unjustified, duplicated, misrepresented, or not used as approved.

Final statement: Connecticut residents deserve accountability

Connecticut families are not unlimited sources of revenue. We have mortgages, children, groceries, transportation, insurance, retirement savings, and countless other responsibilities. Many of us are working harder than ever and still falling behind.

I work overtime every week. I own a home. I make payments whenever I can. I have even taken money out of my retirement savings to prevent my electricity from being shut off. And somehow, I am still expected to accept that the answer is to pay even more.

At what point does anyone consider the people who are actually paying these bills? At what point does Eversource have to demonstrate what it has accomplished, explain what it plans to do, and prove that every amount it seeks is fair before customers are asked to pay more?

I strongly oppose approving this request as filed. I am asking PURA to examine each part separately, protect customers from unsupported and duplicate charges, demand proof of past spending, place enforceable safeguards on future investments, and consider the financial reality facing working Connecticut families.

We deserve proof, transparency, fair treatment, and results—not a blank check.

Respectfully,

Initials: NH General area: New Britain, Connecticut

Connecticut Homeowner and Ratepayer