Date Filed: September 08, 2026

Witness: Edward A. Davis and Kimberly R. Parsons
Request from: Office of Consumer Counsel

Question:

(Rate 7 – Residential TOU Rate) Please explain whether the Company has the capability to implement TOU distribution and supply rates. If so, why does Rate 7 only include TOU transmission rates but not TOU distribution or supply rates? If not, why not?

Response:

Currently, Rate 7 has TOU rates (defined and specifically referred to as Time-of-Day or TOD rates in the Company's tariff) for the Transmission, NBFMCC and Supply components of service. The Company has the capability to implement TOU Distribution rates (presuming using the same structure and metering and billing processes as current TOD Supply rates) recognizing developing and implementing such rates would require a regulatory directive, establishment of requirements and IT and billing system and process development, testing and implementation.

In Docket No. 03-07-02RE10, Order 3, PURA required CL&P to implement TOU pricing for the Transmission and NBFMCC bill components on January 1, 2009. In a Letter Ruling, dated November 13, 2008, the PURA stated, "CL&P will not be required to implement residential TOD Transmission or NBFMCC rates at this time".[1] PURA also stated it wanted to review the results of the meter and rate design study being conducted by CL&P.

In Docket No. 16-07-21, the Company proposed that it would ask PURA to review the Company's Rate 7 TOU pricing in its upcoming rate case. The Company proposed in Docket No. 17-10-46 that time differentiating rates be established for Transmission and NBFMCC rates only to be consistent with other TOU rates offered by the Company. This was approved in the Final Decision of Docket No. 17-10-46 dated April 18, 2018.[2]

[1] https://www.dpuc.state.ct.us/dockhistpre1900.nsf/8e6fc37a54110e3e852576190052b64d/f0e2c5cc5e1453e2852582c7004d5cda?OpenDocument
[2] https://www.dpuc.state.ct.us/2nddockcurr.nsf/8e6fc37a54110e3e852576190052b64d/94bb6bafd75d916f85258752007985f2?OpenDocument