THE TOWN OF FARMINGTON

INCORPORATED 1645

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November 9, 2026

Connecticut Public Utilities Regulatory Authority
10 Franklin Square
New Britain, CT 06051

RE: Docket No. 26-05-10, Application of The Connecticut Light and Power Company d/b/a Eversource Energy to Amend its Rate Schedules

Dear Executive Secretary Gaudiosi and Members of the Authority:

The Town of Farmington respectfully urges the Public Utilities Regulatory Authority to subject Eversource's proposed electric distribution rate increase to the most rigorous scrutiny, to reject or substantially reduce any amounts not demonstrated to be necessary and prudent, and to require Eversource to publicly disclose the full impact of its proposal on every commercial and industrial rate class.

We recognize the importance of a safe, reliable and resilient electric grid, and we understand that this is Eversource's first request to adjust its distribution rates in nine years, though it is also seeking recovery of storm-related costs. But Eversource is asking Connecticut customers for an additional $727 million annually.

The Attorney General has noted that even without recovery of 2018-2025 storm costs, the request would still be about $451 million. By Eversource's own notice to customers, an average residential customer using 700 kWh would see their monthly bill rise 18% on a total bill basis, which represents an increase of approximately 50% to the local delivery component of the bill. These headline figures are stated for residential customers. An increase of this size, in a state that already has some of the highest electricity costs in the nation, demands thorough review and full transparency.

Why This Matters to Farmington

Farmington is a regional center of commerce. Our residential population is 27,134, yet the Town is home to approximately 28,561 jobs and about 3,483 businesses, along with roughly 2.2 million square feet of commercial space and 4.6 million square feet of office space. The Hartford Business Journal's 2026 rankings of the best places for business among Connecticut's 169 municipalities placed Farmington 15th, based on the strength of our commercial markets. That success was built over decades by employers who chose to invest here, and they depend on a cost environment that allows them to stay and grow.

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- According to the U.S. Energy Information Administration, Connecticut's average 2025 commercial electricity price was 23.11 cents per kilowatt-hour, compared with a national average of 13.41 cents across all sectors, making Connecticut's commercial electricity price roughly 72% higher than the national average and that is before their proposed rate increase.

  Electricity is a significant operating cost for these employers, and Connecticut is already at a disadvantage. A rate increase of this magnitude could substantially dampen opportunities for businesses to remain and expand in Connecticut, and it could influence decisions on where to locate new investment and jobs.

Impact on the Town of Farmington

The Town is also a ratepayer. A few years ago, we made the capital investment of purchasing our own streetlights and converting them to LED to save money. In this proposed rate increase is approved, our partial service street lighting of LED lights would increase on average 115% resulting in additional $27,662 of electricity costs, new costs to Town Hall, other town owned buildings, and the Wastewater Treatment plant would add $83,000 in new cost to the Town.

On the school side it is estimated that if this rate is approved it would result in a total of $155,000 of new costs to power the schools.

Businesses Have Not Been Given Clear Information

Public communication about this proposal has focused on the impact on residential customers, schools and churches. The Town has received a notice from Eversource listing the proposed rates for each class, from residential service to commercial tiers, street lighting and electric vehicle charging, and the increases are significant. Yet these class-level impacts have not been presented to the public, to small businesses or to employers in an accessible, comparable way, and a notice listing rate does not show a business what it will actually pay.

For a rate request of this size, that gap is unacceptable. Businesses are central to Connecticut's economy and are entitled to the same level of transparency and consideration as every other customer group.

We respectfully ask PURA to require Eversource to publish a clear breakdown of proposed bill impacts for every commercial and industrial rate class, including:

1. Representative bills for small, medium and large customers, and for manufacturing and non-manufacturing customers, before and after the proposed increase.

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2. The separate effect of changes to energy-based charges and demand-based charges.
3. The projected annual dollar and percentage impact for typical customers in each class.
4. The impact in each year of any multi-year plan, not only the first year.

The Disproportionate Effect of Demand Charges

Many commercial and industrial customers pay charges based on their maximum demand, measured in kilowatts, in addition to charges for total consumption. A business can use electricity steadily all month, yet a brief spike in demand can set its peak and drive a large part of its bill. Restaurants, manufacturers, medical facilities, office buildings and others with significant heating, cooling, refrigeration or production loads can face large swings. Increases in demand-related charges can therefore hit a business's bottom line hard even when its total usage has not changed, and for firms with thin margins these costs are difficult to absorb.

PURA should evaluate the proposal's effect on every commercial and industrial classification and should not rely on average residential bill estimates. We also ask PURA to confirm that any change to demand charges is supported by cost-of-service evidence and to consider phasing in any approved increase.

Separating Storm Costs From Ongoing Distribution Costs

We understand that roughly half of the requested increase relates to previously incurred storm costs that are also the subject of a separate PURA proceeding.

We ask PURA to keep these matters clearly distinct, so that customers can see how much of any approved increase supports ongoing distribution service and how much recovers past storm costs, and so that the outcome of one proceeding does not prejudge the other.

Oversight of the Proposed Multi-Year Rate Plan

Eversource has proposed a performance-based, multi-year rate plan with annual adjustments. Moving away from a traditional rate case for an extended period raises serious questions about transparency, accountability and the ability of ratepayers to evaluate future increases. Annual formula-based adjustments and added cost-recovery mechanisms must not substitute for rigorous review of the utility's capital investments, operating costs and performance. PURA should ensure that any such plan includes meaningful performance and reliability metrics with financial consequences, appropriate earnings safeguards, and real opportunities for public and ratepayer participation throughout the term.

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We also support the broadest possible public access to Eversource's supporting documents. Eversource had asked that a large portion of its filing, reportedly some 300,000 pages, be kept confidential. While Regulators rejected Eversource's augment to keep the information confidential, we urge PURA to limit confidentiality to what is truly necessary so customers and municipalities can evaluate a request of this size with access to the necessary information.

Benchmarking Eversource's Costs

Connecticut's municipal electric utilities, including Wallingford's, deliver electricity at rates well below those of Eversource; one published comparison of typical residential bills found savings ranging from 23 to 64 percent.

The Town recognizes that these utilities differ in ownership, scale, taxation and the state programs they fund, and we do not suggest the comparison is exact. It does show, however, that electricity costs in Connecticut are not fixed.

We ask PURA to require Eversource to justify its major cost drivers, including its capital program and its operating and administrative costs, against appropriate benchmarks, and to demonstrate that it has pursued every available avenue to reduce costs before asking customers to pay more.

Requests to the Authority

The Town of Farmington respectfully asks PURA to:

1. Require Eversource to publish bill impacts for every commercial and industrial rate class, including energy and demand charges, as described above.
2. Scrutinize the necessity and prudence of every proposed expenditure, benchmark Eversource's major cost drivers against appropriate comparisons, and deny or reduce amounts not shown to be justified.
3. Keep recovery of storm costs separate from, and transparent relative to, ongoing distribution costs.
4. Reject, or place strict limits on, automatic annual adjustments under any multi-year plan, and preserve robust public review throughout.
5. Consider phasing in any approved increase to reduce rate shock for businesses, municipalities and residents.
6. Limit confidential treatment of Eversource's filing so the public can review the basis for the request.

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Conclusion

Electricity affordability is no longer only a utility issue. It is an economic development issue that affects Connecticut's ability to retain employers, attract new investment and sustain a competitive business climate.

Farmington's experience shows what is possible when employers choose to build and grow here, and the Town wants to protect that success. We urge PURA to conduct a thorough and transparent review, to balance the need for grid investment against the economic realities facing Connecticut's residents, municipalities and employers, and to require Eversource to show businesses exactly what this proposal would cost them.

Thank you for your consideration of these comments.

Respectfully submitted,

Kathleen A Blonski

Kathleen A. Blonski
Town Manager
Town of Farmington

KB/rp