STATE OF CONNECTICUT
PUBLIC UTILITIES REGULATORY AUTHORITY
DOCKET NO. 26-09-34
EVALUATION OF THE STAKEHOLDER GROUP COMPENSATION PROGRAM

NONPROFIT ACCOUNTABILITY GROUP

CORRESPONDENCE COMMENTS

November 19, 2026

The Nonprofit Accountability Group ("NAG") respectfully submits this correspondence to the Public Utilities Regulatory Authority ("PURA") for consideration in Docket No. 26-09-34, the Authority's review and evaluation of the Stakeholder Group Compensation Program ("SGCP").

On September 23, 2026, NAG convened a discussion with community members, stakeholder representatives, and other participants to discuss the experience of participating in PURA proceedings through the SGCP and to identify recommendations for improving the program. The discussion included individuals participating in person and remotely, including community members, stakeholder representatives, and representatives involved in the evaluation of the SGCP.

NAG believes the discussion provided important information regarding how the SGCP operates in practice and how the program affects the ability of community-based organizations and residents to participate meaningfully in PURA proceedings.

I. The Stakeholder Compensation Program Expands Meaningful Community Participation

Participants emphasized that the SGCP has made it possible for NAG and other organizations to participate in PURA proceedings that otherwise would be difficult or impossible for community-based organizations and low- and moderate-income residents to access.

NAG used the program not simply to participate as an organization, but to educate and prepare community members to participate meaningfully in PURA proceedings. NAG reported training more than 30 people through workshops designed to help residents understand PURA, utility issues, and the questions in the proceedings before the Authority.

Participants explained that this process allows residents to provide information about how PURA programs actually operate in their communities, not just how they theoretically operate based on PURA decisions. Community members who participate in NAG's workshops have direct experience with utility programs, affordability programs, transportation barriers, payment difficulties, and other issues that may not otherwise come to PURA's attention through the administrative record.

Several participants emphasized that community members are themselves an important source of expertise regarding the real-world consequences of PURA decisions. As one participant explained, community feedback can identify unintended consequences and provide information about whether programs are actually reaching the people they are intended to serve.

The discussion also emphasized that meaningful participation requires more than merely allowing members of the public to submit written comments. Community participation often requires education, preparation, transportation, childcare, food, and other accommodations to eliminate barriers to residents' participation in meetings and workshops.

II. NAG's Community-Based Model Is Different From Traditional Stakeholder Participation

A recurring issue discussed at the meeting was the difference between NAG and organizations whose participation in PURA proceedings is part of their ordinary organizational functions.

NAG is the only community-based environmental justice organization engaged in PURA dockets. Participation in PURA proceedings is one component of its broader community improvement work. NAG therefore invests substantial time in educating residents, organizing community members, providing accommodations, and helping individuals understand and participate in technical regulatory proceedings.

NAG regularly convenes groups of low- and moderate-income residents who qualify for the PURA affordability programs. This offers an opportunity for NAG to regularly poll these participants regarding their knowledge of, access to, and the affordability of utility services and PURA programs. No other group does this independently of the utility companies.

Participants described the importance of this model in bringing people who ordinarily would not participate in PURA proceedings into the process.

One participant described how childcare and transportation provided through NAG's program made it possible to attend workshops and become engaged in the proceedings. Another participant emphasized that transportation costs can be a significant barrier to participation. Participants also explained that NAG’s 5-hour PURA workshops often occur during breakfast and lunch hours, making food an important accessibility consideration.

These expenses should therefore be evaluated in the context of the stated purpose of the SGCP: facilitating meaningful participation by residential utility customers and communities that otherwise may not have the resources or access necessary to participate.

III. Greater Clarity Is Needed Regarding SGCP Procedures and Eligibility for Compensation

After discussion of the benefits of SGCP and the unique role of NAG, the conversation turned to discuss questions concerning the SGCP process. Currently, participation in the dockets comes at high risk to stakeholders relying on stakeholder compensation. Payment relies on PURA’s interpretation after the fact of the following definitions. At the end of the docket, participants will be denied payment of expenses that were presented in the approved budget and subsequently incurred if PURA decides that the stakeholder did not make a substantial contribution to the docket, that the expenses were not acceptable to PURA, or that the documentation of the expenses is inadequate. This process represents an unfair burden on NAG and the other stakeholders. PURA needs to clarify its processes and definitions to reduce time

spent on documentation and provide assurance of final payment once the stakeholders follow the stated program procedures.

Participants requested clarification of the following:

What constitutes a "substantial contribution"?
What activities and expenses are reimbursable?
What documentation is required?
How much documentation is required; is the time needed for documentation reimbursable even if it is done after the docket closes?
What constitutes "overhead expenses" and why would they not be compensated?
What specific information must be provided to obtain advance payment?
How are advance payment requests evaluated?
How are staff and consultants expected to document their work?
How can stakeholders determine whether proposed activities will qualify for compensation before the work is performed?

It is also unclear about the flexibility that stakeholders who are conditionally awarded funding from the Stakeholder Group Compensation Program have in changing their expenditures. PURA has allowed changes within and between spending line items, but it is not clear whether stakeholders can spend in new categories without additional PURA approvals, if the total expenditures do not exceed the previous conditionally approved budget amounts.

NAG believes docket participants need clearer and more accessible guidance regarding program requirements, particularly before substantial amounts of uncompensated work and expense are incurred. NAG is willing to provide suggested answers to these questions.

IV. The Administrative Burden of Documentation Should Be Considered in the Evaluation of the Stakeholder Group Compensation Program

Participants described the amount of reporting and documentation required by the SGCP as a substantial burden.

NAG reported that after receiving an advance payment, it must subsequently provide documentation demonstrating that the work associated with the payment was performed. Participants stated that the reporting process itself can require many additional uncompensated hours.

This creates an important issue for the evaluation of the program. Administrative requirements intended to ensure accountability should not become so burdensome that they discourage the very community participation the program was created to facilitate. We believe that PURA has now made the process burdensome to the point of discouragement.

The evaluation of the SGCP should consider not only whether documentation requirements provide accountability, but also:

How much time participants spend complying with documentation requirements;
Whether those requirements are proportionate to the amounts being requested;
Whether participants can reasonably understand the requirements before incurring expenses;
Whether additional documentation is repeatedly requested after an application has been submitted; and
Whether the administrative burden disproportionately affects small community-based organizations.

Clarification of the procedures cited in section III above would help to reduce the administrative burden on both the stakeholders and PURA staff.

V. Advance Payments and Payment Delays Present Significant Challenges

NAG also discussed the practical importance of receiving compensation in a timely manner.

NAG explained that community organizations may not have sufficient resources to finance participation in PURA proceedings for six months or a year while awaiting reimbursement. Participants discussed situations in which payment has taken substantially longer than expected.

The discussion also highlighted NAG's experience with advance payment requests and prior compensation decisions, including instances in which requested amounts were reduced or requests were denied, especially in more recent docket requests.

For a small community-based organization, delayed reimbursement can effectively prevent participation even if compensation is theoretically available.

The Authority's evaluation should therefore examine the entire payment process, including:

Application;
Eligibility determination;
Advance payment request;
PURA review;
Utility payment;
Fiscal-agent processing;
Final reconciliation; and
The total amount of time between an eligible expense and actual payment.

NAG recommends that if the stakeholder compensation request is greater than 5% of an organization’s annual budget, then PURA should grant advance payment.

All payments should be billable as incurred on a monthly basis, since payment of bills typically takes a minimum of 60 days, but often 90 days or more; this lag time is unacceptable.

VI. Denials Should Provide Clear and Meaningful Reasons

Participants expressed concern that compensation denials do not always provide sufficient information regarding why an expense or request was rejected.

NAG reported that it has experienced denials for which the organization did not receive detailed explanations and that the appeals process has not always provided sufficient information to understand what could have been done differently.

Clear explanations are important for both accountability and program administration. A participant should be able to understand why a request was denied and what, if anything, could be changed in a future application.

NAG therefore recommends that compensation denials identify the specific basis for the decision and, where appropriate, identify the documentation or information that would have been necessary to support the request.

If PURA believes that docket participants cannot make a substantial contribution, they should not offer stakeholder compensation in the notice of proceedings. In the CL&P Rate Adjusted Mechanism (RAM) 26-01-03 docket, in its Notice of Proceeding, PURA provided that Stakeholder compensation was available for the docket. After NAG applied, PURA denied NAG's request for stakeholder compensation because, PURA said "NAG's planned participation will not provide a substantial contribution toward resolving the primary issues presented in the 2026 CL&P RAM Review". It stated that the docket was basically a math exercise and did not involve evaluations of policy or processes. Yet at the RAM Technical Meeting held on January 7, 2026, the RAM process itself was under active consideration for procedural change. Topics raised included: ● proposals by United Illuminating (UI) to allow some rate changes without public hearings; 1 ● potential reduction of discovery timelines by approximately two months; ● consolidation or elimination of public hearings in the name of "streamlining"; and ● broader discussion, initiated by Chairperson Wiehl, regarding the volatility of customer bill impacts resulting from reconciliation mechanisms. These are policy and procedural issues that could have benefited from NAG's input.

VII. Overhead and Accessibility Expenses Should Be Examined

"Overhead expenses" such as copying, space rental, and translation services are real costs that would not be incurred if it were not for participating in these dockets, since NAG does not have an office. These are direct expenses, not overhead expenses. PURA should define what it means by "overhead expenses." Overhead expenses are usually expenses that cannot be assigned to any one activity such as utilities, insurance, or property taxes. In addition, overhead expenses are real expenses that stakeholders have to pay. It is unfair if PURA shifts these costs to other funders.

VIII. The Program Should Recognize Community Members as Sources of Expertise

Participants repeatedly emphasized that residents bring expertise to PURA proceedings that cannot be obtained solely through technical or professional analysis.

Community members can explain how utility programs function in practice, identify barriers to accessing programs, and describe unintended consequences experienced by customers. If community members do not bring this information to PURA, PURA has limited ways of verifying claims from the utilities and evaluating the effectiveness of utility programs. NAG believes that those who use the PURA programs are in the best position to make recommendations for improvements to the programs.

NAG's model provides a mechanism for developing that expertise. Participants receive training, learn about PURA proceedings, and are then able to contribute information based on their experiences and the experiences of their communities.

IX. Utility Affordability

The cost of living has increased significantly in recent years. Utility costs, in particular, have outpaced inflation and are projected to continue rising over the next decade due to growing electricity demand, supply constraints, and the need to modernize the electric grid. While PURA is obligated to manage grid reliability, supply, and demand growth, NAG recognizes that PURA also bears the responsibility of keeping utility services affordable. PURA cannot achieve this alone. Alongside input from professional staff, consultants, and utilities, PURA needs the expertise of the low- and moderate-income ratepayers most directly affected by these costs.

To bridge this gap, NAG trains low- and moderate-income ratepayers to become subject-matter experts who combine lived experience with an understanding of PURA's systems and utility assistance programs in theory as well as in practice. Driven by our core energy justice goal of utility affordability, NAG provides actionable recommendations tailored to low- and moderate-income households. In fact, one docket participant noted that NAG members have introduced unique types of recommendations never before proposed in PURA proceedings. Empowering this level of community expertise is precisely why the Stakeholder Group Compensation Program was established.

We recognize—as does the legislature—that this vital work does not entitle NAG or any other stakeholder to unlimited ratepayer funding. For that reason, the legislature capped the Program at $1.2 million annually, which equates to roughly 72 cents per year for the average ratepayer (based on an Eversource estimate that $20 million per year equals $1 per month per average ratepayer). To date, PURA has never come close to spending this cap.

NAG members—and, we believe, the vast majority of ratepayers—would gladly pay 72 cents a year to ensure trained, low- and moderate-income experts can help PURA design effective affordability programs that are fair to all ratepayers. Yet PURA is creating barriers that make it difficult for these very stakeholders to participate. Reducing stakeholder compensation to the equivalent of 10 or 25 cents per ratepayer per year is counterproductive to the goal of affordability; it only restricts the participation and expertise of those who bear the heaviest burden of high utility bills.

X. Opportunities for Participation Should Be Available Throughout Long-Running Dockets

Participants also raised concerns regarding the length of some PURA proceedings.

Some dockets continue for years. If a community organization is unable to enter a docket at the beginning of the proceeding, it may lose the opportunity to participate even though important issues affecting the community may arise years later.

NAG suggests that PURA consider mechanisms allowing qualified stakeholder organizations to seek participation and compensation at appropriate points throughout a proceeding, rather than creating a single opportunity that may effectively exclude community organizations that were not aware of the docket at its inception.

This concern is particularly relevant to organizations whose community engagement is ongoing and whose participation may depend upon developing issues within a docket.

NAG recommends that PURA should open multi-year dockets annually to allow stakeholder compensation.

XI. Communication Between PURA and Stakeholder Organizations Should Be Improved

Participants also described a need for greater communication between PURA and stakeholder organizations.

NAG reported that its experience has sometimes involved uncertainty regarding what procedures are acceptable, what activities are compensable, and the likelihood that particular expenses or activities will be approved. NAG frequently does not understand why certain PURA decisions are made and its applicability to future dockets. NAG also questions whether PURA understands how NAG operates and its procedures.

Participants noted that case coordinators have been helpful in explaining procedural matters, while also noting that some questions concerning the reasons for decisions must be referred to other PURA decision-makers.

NAG believes a more transparent communication structure would benefit both PURA and stakeholders by reducing unnecessary applications, repeated questions, documentation problems, and disputes over expenses.

XII. Recommendations for Consideration in the SGCP Evaluation

Based on the September 23 discussion, NAG respectfully recommends that PURA consider the following potential improvements:

> **Provide clear, plain-language guidance** explaining eligibility, substantial contribution, reimbursable activities, reimbursable expenses, documentation requirements, and advance payment procedures.
> **Provide greater prospective certainty** regarding whether proposed activities and expenses are eligible for compensation before stakeholders incur significant costs.

Provide specific reasons for denials, including identifying the basis for the denial and, where appropriate, the information or documentation necessary to support a future request.
Review documentation requirements to determine whether they are proportionate to the amount of compensation requested and the size and capacity of the stakeholder organization.
Examine payment timelines from the initial request through actual payment and identify ways to reduce delays.
Evaluate advance payment procedures to ensure that small community organizations are not effectively excluded because they lack the resources to finance participation for extended periods.
Review the definitions of and treatment of overhead and accessibility expenses.
Recognize community expertise as a meaningful form of stakeholder contribution and ensure that the compensation structure does not favor only organizations with professional regulatory staff.
Provide opportunities for qualified organizations to enter or re-enter long-running dockets when significant issues affecting residential customers arise.
Improve communication between PURA and stakeholder organizations, including open discussions of process, clearer points of contact and explanations of procedural and substantive requirements.
Update PURA's public information regarding the SGCP so that current requirements and procedures are clearly and accurately communicated to potential participants in greater detail.
Include meaningful stakeholder participation in the evaluation itself, particularly participation by organizations and residents who have direct experience using the SGCP, instead of rejecting SGCP payment to these stakeholders.

XIII. Importance of Stakeholder Input to the Evaluation

NAG appreciates the opportunity to provide this information as part of Docket No. 26-09-34.

The purpose of evaluating the SGCP should include determining not only whether the program has distributed compensation, but whether the program is actually accomplishing its intended purpose of facilitating meaningful participation by the communities and residential utility customers the program is intended to serve.

NAG's experience demonstrates that participation requires more than sending information to the public record. It requires outreach, education, training, transportation, childcare, food when appropriate, preparation, technical assistance, and time.

The September 23 discussion also demonstrated that community members themselves have important information about the operation and consequences of PURA programs. Preserving a mechanism through which those experiences can be brought into the regulatory process is important to the effectiveness of stakeholder participation.

NAG has spent a lot of time and effort participating in this docket, and we regret that this is another example of providing uncompensated expertise.

Given the current PURA policies and rulings, as well as the number of obstacles to participation in the Stakeholder Group Compensation Program, NAG cannot recommend that other community based organizations of low and moderate income residents participate in the Program.

NAG respectfully requests that PURA and the SGCP consultants consider the experiences and recommendations described above as part of the evaluation of the Stakeholder Group Compensation Program.

Respectfully submitted,

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