



December 23, 2016

Jeffrey R. Gaudiosi, Esq.  
Executive Secretary  
State of Connecticut  
Department of Public Utility Control  
10 Franklin Square  
New Britain, CT 06051

RE: Docket 16-02-30—PURA Review of Electric Distribution Companies Cost of Service Study Methodology and Rate Design

Dear Commissioners Dykes, Betkoski, and Caron,

On December 19, 2016, at the request of the Public Utilities Regulatory Authority's ("PURA" or "Authority") staff, the Authority directed the electric distribution companies to submit a cost-of-service study ("COSS") specific to residential customers with solar energy. Please accept this letter from Vote Solar on this recent decision.

Vote Solar is a non-profit grassroots organization working to foster economic opportunity, promote energy independence and address climate change by making solar a mainstream energy resource across the United States. Since 2002, Vote Solar has engaged at the state, local, and federal levels to remove regulatory barriers and implement the key policies needed to bring solar to scale. Vote Solar is not a trade group and does not have corporate members. Vote Solar is particularly focused on rate design issues related to solar distributed generation, including the billing arrangement known as net metering. Recognizing the importance of this policy for supporting customer-sited solar and other renewable energy technologies, Vote Solar is actively participating in net metering and broader rate design regulatory proceedings in states across the U.S, including: Arizona, California, Colorado, Georgia, Iowa, Kansas, Louisiana, Maine, Massachusetts, Minnesota, Nevada, New Hampshire, New Mexico, New York, North Carolina, Utah, and Vermont, among others.

The March 10, 2016 Notice of the commencement of this proceeding stated that the purpose was to "conduct a full cost of service study and rate design generic review." The notice stated that PURA's objective was to "establish a standardized methodology for the electric companies." The decision on December 19, 2016 to require the electric companies to conduct a COSS for a subset of customers is beyond the scope of methodology, and the purpose stated in the notice. Any decision related to the implementation of a COSS – including if a separate COSS is needed for



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a subset of customers – is not methodology. Accordingly, Vote Solar requests that the Authority refrain from COSS implementation details in this docket. Alternatively, PURA could issue a new notice and permit other parties the opportunity to seek intervention.

Vote Solar appreciates the opportunity to comment on the Authority's recent action. Thank you for your time.

Sincerely,

Nathan Phelps

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