



Advancing the Clean Energy Future

21 Oak Street • Suite 202  
Hartford, CT 06106-8015  
860.246.7121 • [acadiacenter.org](http://acadiacenter.org)

August 21, 2023

Jeffrey R. Gaudiosi, Esq.  
Executive Secretary  
Public Utilities Regulatory Authority  
10 Franklin Square  
New Britain, CT 06051

**Re: Docket No. 21-05-15RE02 PURA Investigation Into Performance Mechanisms For A Performance-Based Regulation**

Dear Mr. Gaudiosi:

Acadia Center hereby submits to the Public Utilities Regulatory Authority (“Authority”) its written comments in response to the Authority's August 10, 2023 Notice of Request for Written Comments.

The proposed reported metrics, scorecards, and performance incentive mechanisms included in our written comments reflect Acadia Center’s proposal for how the priority outcomes for Performance-Based Regulation in Connecticut may be achieved. We look forward to exploring our proposals and those of other stakeholders in more detail, and in particular to determining which metrics may be best suited as report-only metrics, scorecards, or performance incentives and/or penalties. While some metrics in our written comments may currently be recommended for report-only or scorecards, Acadia Center may subsequently recommend certain metrics for performance incentives and/or penalties as the proceeding unfolds and as the Authority collects additional information through any future interrogatories to the electric distribution companies.

Additionally, as the Authority considers establishing any report-only metrics, Acadia Center recommends that the Authority consider a process for transitioning report-only metrics to scorecards and/or performance incentive mechanisms over time, as appropriate. Report-only metrics can be useful for collecting baseline performance data, and Acadia Center recommends allowing for flexibility and learning over time so that any metrics, scorecards, targets, or financial incentives/penalties can be fine-tuned as that baseline data is collected.

Sincerely,

Oliver Tully  
Director, Utility Innovation & Accountability  
[otully@acadiacenter.org](mailto:otully@acadiacenter.org)  
860-246-7121 ext. 202

Jayson Velazquez  
Climate and Energy Justice Policy Associate  
[jvelazquez@acadiacenter.org](mailto:jvelazquez@acadiacenter.org)  
860-246-7121 ext. 203