

Jortner, Wayne

From: Thomas Matsuda <matsudat@yahoo.com>
Sent: Tuesday, November 17, 2015 7:36 PM
To: Jortner, Wayne; pshumlin@state.vt.us
Subject: Comment to the DPS on how it can improve

A friend complied this and I agree with every point!

Respectfully,
Thomas Matsuda
Amherst, MA

- **All Vermonters should have an equal right to assistance from a Public Advocate Office.** Not all "public interests" are the same for all groups in any society. If different groups (e.g. ratepayers, property owners, small businesses) have differing interests, advocates should be assigned to represent the interests of each group, and/or funding should be provided to individuals and organizations, who want to intervene in the Section 248 process.
- **The Public Advocate Office should advocate for more than just lower rates!** It's a myth that ratepayers care only about the cost of energy. Many ratepayers would be willing to pay a bit more for clean energy. Vermonters want a Public Advocate Office willing to stand up to utility pressure and advocate for our right not to pay for unnecessary fossil fuel infrastructure. We want a Public Advocate Office that has the independence to demand that all utility customers should have the right to opt out of paying for dirty fossil fuel infrastructure!
- **The Public Advocate Office should be required to share complaints and communications received from ratepayers and members of the public with the Board and other parties during the course of Public Service Board proceedings.** Nearly 500 Vermont Gas ratepayers wrote to the Public Advocate Office saying that they couldn't afford to pay for the increased rates necessary to pay for the ballooning ANGP costs. DPS never presented or even acknowledges these concerns during the technical hearings on the ANGP in June. Instead, the Department supported VGS claims that current customers would benefit from the project. This should never be allowed to happen again!
- **Improving the structure and effectiveness of the Public Advocate Office should start today - with a reasonable schedule for accessible public hearings and a comment process that makes sense!** The way the Department is going about collecting public input for this report is a perfect example of how poorly the Public Advocate Office serves ratepayers and the public:
 - There are no public hearings being held in locations that are convenient for residential natural gas ratepayers, who could face the largest rate increases for energy infrastructure in the history of Vermont. Shelburne is still far from Burlington and St. Albans.
 - There has been almost no advertising or public outreach about the hearings!
 - And, DPS hasn't even bothered to produced any written materials, a draft report, or even a list of questions for the public but nevertheless wants the public to offer comments on how the Public Advocate Office should be structured! The average Vermonter isn't an expert of government organizational structure or public advocate offices. Why hasn't DPS given us something to respond to in public comments????

- **Until an effective and independent Public Advocate Office can be established, the Vermont public deserves to have Independent Counsel appointed for all large pending utility cases, including the Addison Natural Gas Project!** Regardless of when or whether steps are taken to improve the structure and effectiveness of the Public Advocate Office, ratepayers and the public deserve an effective public advocate to represent them, now! Until something can be done to fix this problem, independent counsel should be appointed to represent ratepayers and other members of the public in all major utility cases, including the Addison Natural Gas Project. Currently, the Board isn't required to appoint independent counsel when ratepayers, the public, and the Governor or Department have differing interests, or when a conflict of interest arises. Whether to appoint independent counsel is at the discretion of the Board, and to date, the Board has pretty much never appointed independent counsel no matter how obvious it is that the Administration's and ratepayers' interests are at odds. This needs to change!

And these are AARP's recommendations to improve the Department of Public Service's Advocate Office:

- The public advocate office should be an **independent office** that is removed from the political pressure to support utility company projects and rate proposals.
- The public advocate office should be **independently** representing the interests of Vermont electric and gas customers so that your utility bills are fair and reasonable.
- **Public advocates for ratepayers** should have technical and legal expertise and **should have strong track record for independent action and advocacy**. The ratepayer advocates should have limited direct ties with the utilities.

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