

Consumer Protection and Consumer Advocacy



The Regulatory Assistance Project

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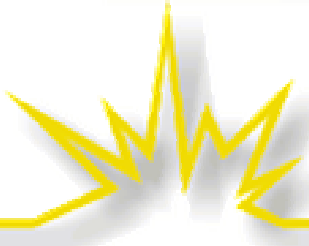
Website:

<http://www.raonline.org>



Consumer Protection As Policy Goal

- Part of balancing of interests by agency
 - ❖ Affirmative duty to protect
 - ❖ Reliance on consumer advocates
- Use of process
- Use of rules



Regulation and the Need for Consumer Advocacy

- Public participation
- Confidence in the process
- Hearing and understanding the views and interests of different parties
- Public acceptance
- Learning to speak the language of regulation
- “Buy-in” for common public goals



Resource Imbalance of Parties

- Utility resources
- Utility's advocacy as a cost of service



Structure of Consumer Advocacy Offices

- Government funded
- General consumer advocate
- Residential advocate
- Small business advocate
- Low-income advocate



Government Funded Advocates

- General consumer advocate
- Residential advocate
- Small business advocate
- Low-income advocate




NGO Advocates

- Business trade group (hotels, etc)
- Industrial advocate
- Environmental advocate
- Structure of consumer advocacy offices



Location

- Attorney General
- Agency
- Other governmental agency
- Independent office



Essential Resources for Large Office

- Attorneys
- Analysts
- Engineer
- Accountants
- Support staff
- Consultant budget



Essential Resources for Small Office

- Attorney
- Analyst
- Support staff
- Consultant budget

Roles for

Consumer Advocate

- Representation of consumer before the Agency
- Rate proceedings
 - ❖ Revenue requirement
 - ❖ Cost allocation
 - ❖ Rate design
- Rules and regulations development
- Service and disconnection standards
- Resource supply decisions



Consumer Advocacy -- The Regulator's Perspective

- Representation of consumer issues before parliament and other agencies of government
- Industry restructuring
- Service quality and terms of service
- Power supply planning and development



Consumer Education and Disclosure

- Education on rights and responsibilities
- Education on energy efficiency
- Disclosure of rules and regulations
- Environmental disclosure



Participation In The Process--Intervention

- Discovery
- Evidence and expert witnesses
- Cross-Examination
- Brief
- Order of Board
- Reconsideration and appeal



Participation in the Process Rate Cases

- Rate Base
- Operating expenses
- Allowable vs. disallowable expenses
- Regulated vs. unregulated operations
- Multi-industry operations
- Rate of R\return



Consumer Protection Laws

- Anti-trust laws
- Enforcement of public service laws
- Complaint process before Agency
- Other enforcement tools
- Other affected industries
- Non-regulated energy suppliers