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Spiegel Partner Pomper Responds to Article Criticizing Serial ROE Complaints

June 7, 2019 | David E. Pomper

David Pomper responded to a recent article in the *Public Utilities Fortnightly* which faulted "successive customer complaints against the same ROE."* In his letter to the editor in *Fortnightly*'s June issue, David provides some background on the 1988 Regulatory Fairness Act and its application of symmetry between utility rate increase filings under Federal Power Act section 205 and complaints requesting rate decreases under the companion section 206. He concludes that the Federal Energy Regulatory Commission "should focus on a merits comparison between the rates that customers pay and study-period costs."

You can read Mr. Pomper's letter at the link below.

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* Carmen Gentile, *Time to Put the Kibosh on Pancaking Section 206 Complaints: FERC Must Act*, Pub. Utils. Fortnightly, Apr. 2019, at 42. Link (password required).

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