

## **Summary of Public Comment on CEAB 2007 Draft Energy Plan**

The Connecticut Energy Advisory Board (CEAB) appreciates all of the comments submitted by the diverse groups of respondents. CEAB recognizes the importance of the participation of the public, businesses and interested parties in the formulation of this plan. As the Executive Summary indicates, the purpose of CEAB's 2007 Connecticut Energy Plan is to identify issues related to the reliability of Connecticut's energy supply, develop recommendations and report on progress for achieving goals set in the previous reports relating to energy, transportation, the environment and sustainable development. The objective of the plan is to outline for Connecticut's state policymakers the initiatives that the CEAB believes are key to achieving long-term energy goals and that will help create successful state energy policy. This section summarizes the comments received, and describes CEAB's response to these suggestions.

Public Hearings on the 2007 Energy Plan were held on at the City Hall in Norwalk on January 9, 2007, at the Legislative Office Building in Hartford on January 10, 2007 and at Three Rivers Community College in Norwich on January 11, 2007. In addition, testimony could be submitted to the CEAB in writing. Testimony was received from the following:

<u>Name</u>	<u>Representing</u>
Gerald Chase	New Castle Hotels and Resorts
David Bauer	City of Middletown
Harry Cullinane	Clover Corporation
Robert Fromer	Self
Paul Michaud	Connecticut Clean Energy Fund
Henry Link	Enviro Energy Connection
Joel Gordes	Environmental Energy Solutions
David & Joyce Jackson	Selves
Bernie Cohen	EMCO Energy
Rodney Bowie	Self
Diba Khan-Bureau	Self
Philip C. Armetta	Dainty Rubbish Service, Inc
Jack Solomon	Self
Donna Alpert Hamblet	Self
James O'Reilly	Northeast Energy Partnerships, Inc
Jonathan A Gordon	NRG Energy, Inc.
Ruth Ann Wiesenthal-Gold	Woodlands Coalition
Reed Hayes	DG Power Systems LLC
Christina Lumbreras	Self
Gail V. Bennett	Self
Marianne Stieglitz	Self
Lynne Borsa	Self
Richard Stanley	Self
M. Renee Taylor	Self
Sally Morrison	Self

<b>Name</b>	Gerald Chase President and CEO	<b>Oral Comments</b> <b>Norwalk</b>
<b>Company</b>	New Castle Hotel & Resorts	
<b>Town</b>	Shelton	

**Summary of Comments:**

- Mr. Chase manages four hotels in Connecticut, with two in Shelton just receiving a 78% increase in electric cost.
- Asked, with an impact of nearly \$1 million per hotel, shouldn't there be more than a 15 day notice.
- Recommended that rate increases be phased in over 6 months; it takes at least that long to prepare alternatives.
- Supported recent "Greening" efforts and conservation program, and would consider cogeneration.

**Board Response:**

The board sympathizes with Connecticut business and the difficulties that rising utility rates have on their competitive position. Rising fuel costs and uncontrolled growth in electric demand in the state have dramatically raised electric rates. Discussions concerning rate increase phase-in have taken place at the highest levels of government, but the reality is that postponing the increase would only further increase the cost in the long term.

The board encourages businesses, like New Castle Hotels and Resorts, to take full advantage of the effective energy efficiency, and demand response programs available through the electric utilities as a way to mitigate the cost of energy. Hotels should also explore the option to install combined heat and power distributed generation. This technology is well suited for the hospitality business sector with its constant need for both electricity and thermal energy. The Department of Public Utility Control has incentives and below interest loans to encourage distributed generation.

<b>Name</b>	Mr. David Bauer	<b>Oral and Written Comments</b>
<b>Company</b>	City of Middletown	<b>LOB Hartford</b>
<b>Town</b>	Middletown	

**Summary of Comments:**

- Recommended reducing base load energy use 10% rather than focusing on reducing peak load.
- Recommended conservation over transmission expansion.
- Recommended the installation of backup generators in emergency shelters for homeland security that could also be used for providing power during high peak loads.
- Recommended the use of time-of-use rates to encourage shifting of loads to low use times.
- Encouraged the state to look into wind farms on Long Island Sound.

**Board Response:**

The energy plan encourages the use of conservation to reduce growth in base load as well as growth in peak demand. It will not, however, negate the need to have an adequate transmission system to move less expensive power to where it is needed. The board supports your recommendation to install renewable energy, such as wind energy; however, there are currently no plans for the state to take on building a wind farm projects. A recent docket at the Department of Public Utility Control mandated the implementation of Time-of-Use rates. The board agrees that these rates will send appropriate price signals that will reduce the growth in peak and shift electric load to off-peak periods. The board also agrees with your suggestion that installing low emission emergency generators able to run during peak load conditions is a good idea, and has recommended that strategy the past two years. Last spring the DPUC approved incentives for anyone who would install a generator for this purpose. Also, ISO New England offers two incentive programs for those who make generators available during emergency peak load conditions.

<b>Name</b>	Harry Cullinane	<b>Oral Comments</b>
<b>Company</b>	Clover Corporation	<b>LOB Hartford</b>
<b>Town</b>	East Hartford	

**Summary of Comments:**

- Supported the use of energy efficient natural gas engine-driven air conditioning as an electric demand reduction strategy and a waste heat recovery strategy for meeting thermal loads.
- Requested correction of inequity between the incentives that are available for electric chiller replacements and natural gas engine chiller systems.
- Suggested using Total Resource Test and life-cycle cost analysis, and not just an electric resource test, for identifying efficiency application that reduce electric demand and use, especially in state buildings.
- Recommended consideration be given to natural gas residential heat-pumps as an efficient replacement for obsolete natural gas equipment, electric air conditioning and electric heating systems, both resistance and heat-pumps.
- Suggested adding recommendations for propane conservation, similar to those recommended for natural gas.

**Board Response:**

The board supports your suggestion to use a Total Resource Test for evaluating energy efficiency equipment and programs. The recommendation to consider residential natural gas or propane heat pumps is a strategy that may show real promise for lowering the residential air conditioning peak and replacing obsolete electric systems. We understand the request to evaluate the effectiveness of natural gas engine driven air conditioning is being evaluated by the Energy Conservation Management Board.

**Name** Robert Fromer  
**Company** Self  
**Town** Windsor

**Oral and Written Comments**  
**LOB Hartford**

**Summary of Comments:**

- Recommended the use of “Life Cycle Net Energy Analysis” in making energy related decision instead of simple payback and lifecycle analysis.
- Suggested developing a “Road Map” and a strategic long range plan to deal with reducing the state’s dependence on oil, especially in light of the global peak oil situation.
- Recommended making sure the energy plan is consistent with the Connecticut Plan for Conservation and Development.
- Suggested expanding public education and outreach to include more than just reducing electric consumption, but also address fossil fuel use, recycling and preservation of natural resources.
- Recommended the formation of a Blue Ribbon Panel or a single agency responsible for creating energy policy, planning and programs.
- Encouraged the developing joint marketing plans for programs offered through CEEF and CCEF.
- Recommended that the state motto be changed to “Connecticut, a state where energy waste is our most important and prolific product.”
- Claimed that the current steady-state economics model is unsustainable and should be replaced with one that recognizes the scarcity of resources.
- Encouraged a strategy to discourage the development of agricultural land and recommends a set-a-side of agricultural land to create open space and future farming.
- Proposed changing state building code to include a provision so older buildings cannot be taken down without an alternate lifecycle net energy analysis for refurbishing the building.

**Board Response:**

The board is reviewing your recommendation to use “Life Cycle Net Energy Analysis” in making energy related decision instead of the current formula for economic and life cycle analysis. This represents a significant change from the current planning and evaluation process and would require further discussion. The current state energy plan, in conjunction with other initiatives, such as the Connecticut Plan for Conservation and Development and the Climate Change Action Plan, are viewed as Connecticut’s “Road Map” and do provide the strategic long range direction for establishing public policy. The 2007 plan does include sections addressing fossil fuels with specific goals and recommendations for reducing the state’s dependence on oil especially in light of the global peak oil situation.

The board agrees with your recommendation to expand public education and outreach to include more than just reducing electric consumption to include addressing fossil fuel use, renewable energy, the impact on low-income households and sustainable development. It also recommends joint advertising and a whole building approach that encourages projects with all fuels energy conservation integrated with renewable energy applications. Section 6 of the plan concurs with your recommendation to support activities that discourage unsustainable development and to encourage preservation of open space. The board is divided on the issue of recommending the formation of a central energy planning organization.

**Name** Paul Michaud  
**Company** Connecticut Clean Energy Fund  
**Town** Rocky Hill

**Oral and Written Comments**  
**LOB Hartford**

**Summary of Comments:**

- Recommended adding “installing renewable energy has the potential to stabilize both electric and gas prices in the state.” Claims renewable energy sources do this by impacting the price of electricity at the ISO level, reducing the demand for natural gas and by giving customers a hedge against future electric increases.
- Expressed concern over the comment in the report that “there is an inadequate quantity of renewable energy to significantly impact reliability cost and security” and asked to include information on the dramatic increase in renewable energy installations in recent years as the industry matures and ramps up, and a projection for industry growth in the future.
- Noted that CCEF supports the board’s recommendation for a regional collaboration on RPS standards and also support the board recommendation to rise net metering to 1MW. CCEF would like to see reconciliation on an annual basis instead of monthly to take into account the seasonality of some renewable sources.
- Further noted that CCEF supports training and licensing of PV installers for quality assurance.

**Board Response:**

The enhancements, comments and corrections you recommended will be made in the final document. We will also include your graphics, concerning the rapid growth of renewable energy in Connecticut in the CT Energy Profile section of the report. The issue of certification of photovoltaic installers is within the responsibilities of the Department of Consumer Protection. The issue of monthly verses annual reconciliation for renewable net metered installation is the responsibility of the DPUC.

**Name** Henry Link  
**Company** Enviro Energy Connections  
**Town** Hartford

**Oral and Written Comments**  
**LOB Hartford**

**Summary of Comments:**

- Expressed concern over Connecticut having to import 700 MW of electricity and supported allowing Connecticut distribution companies to generate electricity. Also recommended that all new generation in the state have dual fuel capability.
- Supported the CEAB recommendation to fully restore the Conservation and Load Management Fund
- Recommended expansion of Project 100 and the addition of solar thermal to the technologies supported by CCEF. Supported the recommendation to increase net metering to 1 MW and asked for annual not monthly reconciliation.
- Supported Time-of-Use rates for all rate classes,
- Supported the increase in on-site combined heat and power distributed generation.
- Supported upgrading to the CT Building Code and supports having all commercial buildings built to high performance Green standards.

- Recommended that the the DPUC reduce rates for customers who signed up for the state’s Clean Energy Choice. Customers who opt for the 100% renewable Clean Energy Option should not have to pay the rate increase caused by rising natural gas and oil prices.

**Board Response:**

The board shares your concern over the need for additional resources to meet Connecticut power requirements and has supported several mechanisms to remedy this shortage over the next few years. Strategies include promoting efficiency, demand response, distributed generation and the RFP process for securing long-term resources. The board appreciates your support for the programs offered through CEEF, CCEF and the decision of the recent docket requiring “Time of Day rates.” The board also agrees with your recommendation to strengthen Connecticut’s building code and to promote high performance building standards. The issue of monthly verses annual reconciliation for renewable net metered installation is the responsibility of the DPUC. The editing changes you recommended for the report will also be considered.

<b>Name</b>	Joel Gordes	<b>Oral and Written Comments</b>
<b>Company</b>	Environmental Energy Solutions	<b>LOB Hartford</b>
<b>Town</b>	West Hartford	

**Summary of Comments:**

- Expressed concern over lack of progress on overarching goals established in 2006.
- Recommended a strategic study be conducted to identify the organizational best practices to managing energy policy, regulatory functions, and program implementation and to make recommendations for Connecticut. The state now have 14 separate organizations.
- Suggested the study look at NYSERDA as a model that separated line responsibility from planning and program administration.
- Expressed concerns over energy security, including; Connecticut’s dependence on foreign oil, the vulnerability of its physical assets, and potential cyberattacks on controls and communications.
- Supported multiple strategies to make the state’s energy systems more secure including fuel diversification and storage, decentralized use of distributed generation and also building the decentralized capability of the grid.

**Board Response:**

The CEAB, in concert with the actions of the Connecticut General Assembly and the Department of Public Utility Control, have been very proactive at putting in place the tools to achieve the 2006 goal of 10% reduction by 2010, however, achieving results may not be linear over the five years timeframe. One example is the incentive program to promote distributed generation (DG), created as a result of the 2005 Act for Energy Independence and structured last spring by a DPUC Docket. In the last eight months the DPUC has received applications for over 200MW of DG but it may take another year to construct the facilities and commence operation. As the state gains more experience with this process, it will become more efficient in predicting the load impact from each of these strategies.

The board has not taken a position and is divided on the formation of a centralized agency to manage energy policy, and program administration.

The CEAB has taken into account some of the concerns you raise over energy security, including efforts to diversify fuel supply, and to promote distributed resources including demand management and distributed generation. The security of the energy infrastructure is under the purview of state and federal homeland security agencies.

<b>Name</b>	David & Joyce Jackson	<b>Oral and Written Comments</b>
<b>Company</b>	Selves	<b>LOB Hartford</b>
<b>Town</b>	West Hartford	

**Summary of Comments:**

- Recommended establishing a licensing program for solar PV installers.
- Supported restoring and even increasing the funding to the Energy Efficiency and the Clean Energy Funds.
- Proposed developing residential rates with an increasing charge with the more electricity you use.
- Recommended increasing public awareness of the energy situation through education outreach programs.

**Board Response:**

The CEAB agrees with your recommendation to create training and certification programs for solar PV installers and will include that recommendation in the plan. We do agree with your recommendations to restore the energy efficiency and clean energy funds and have included them in the plan as well as a recommendation to increase educational awareness programs on energy issues and conservation strategies for all customers. The suggestion to institute increasing block rates for residential customers has been raised and discussed at the Department of Public Utility Control. No decision has been rendered.

<b>Name</b>	Bernie Cohen	<b>Oral Comments</b>
<b>Company</b>	EMCO Energy	<b>Norwich</b>
<b>Town</b>	Norwich	

**Summary of Comments:**

- Supported the use of combined heat and power, especially at state institutions.
- Supported the energy plan's goal to reduce the state's dependence on foreign oil.
- Supported the production and use of biofuels from agricultural crops and waste oil.
- Opposed the continued use of natural gas for generation unless the unit is also using the waste heat in a combined heat and power mode.

**Board Response:**

The board also supports the use of clean, high efficient combined heat and power (CHP) and has included it in the plan. The Department of Public Utility Control currently offers incentives for efficient CHP as a result of Public Act 05-1. The recommendation to reduce our dependence on foreign oil is included in the board's recommendation to reduce the use of all fossil fuels. With the projected growth in the use of natural gas, this will mean further reduction will be needed in the use of petroleum in order to achieve our goal. The CEAB also supports the use of biofuels, both for transportation applications and heating, especially if the feedstock and

production takes place in Connecticut. The board recognizes the state has a growing dependence on natural gas and that its use in generation may adversely effects fuel diversity at some point in the future. The use of natural gas for CHP, however, is both cost effective and one of the most environmentally sound supply options; therefore the board continues to support its use in this form of distributed generations.

<b>Name</b>	Rodney Bowie	<b>Oral Comments</b>
<b>Company</b>	Self	<b>Norwich</b>
<b>Town</b>	Norwich	

**Summary of Comments:**

- Recommended the development of steam loops from existing and new power plants to raise the efficiency of electric power plants by utilizing the waste heat.
- Supported the development of fuel cells, wind energy, solar energy and other forms of renewable energy, and the development of standards for interconnection to reduce engineering cost on the installation of smaller systems.
- Raised concerns over the ability to sustain the growth in power and service requirements with today’s larger more energy intensive homes and businesses.
- Supported individual meters for electricity and heat for all apartment building tenants so that they can be responsible for what they use.
- Supported the expanded use of nuclear power in Connecticut.

**Board Response:**

The board agrees with your recommendation to better utilize waste energy from existing and new power plants, as well as requiring heat recovery in new combined heat and power projects. We also support your recommendation to promote the commercialization of fuel cells, wind energy, solar energy and other renewable sources such as biofuels. The recommendation to standardize interconnection for small renewable energy projects is a recommendation that we have supported for a number of years. The current plan recommends standardized interconnection standards for all units under 1MW. The board is concerned over the growing demands being put on our energy infrastructure and addresses some of our concerns in Section 6 Sustainable Development and through recommendations that improve appliance standards, building codes and energy efficiency programs. The board agrees that tenants should understand the cost of energy used in their units, and although the building code does require electricity be individually metered, it does not require metered heat. It is sometimes difficult to monitor tenant use of heat because of the characteristics of central heating systems. There is a moratorium on the siting and construction of new nuclear generating facilities until the issues concerning the disposal of high level nuclear waste have been resolved. Furthermore, CEAB supports the use of preferential criteria standards for selections energy projects based on least cost and least impact on the environment.

**Name** Diba Khan-Bureau  
**Company** Self  
**Town** Norwich

**Oral Comments**  
**Norwich**

**Summary of Comments:**

- Supported the requirement to build all state buildings using “Green” buildings standards, and wants to know why the Department of Public Works is still building state facilities to the minimum requirements of the state building code, like the new facility at Three Rivers Community College.
- Supported the expanded use of renewable energy and does not support the expanded use of nuclear power.

**Board Response:**

The CEAB has recommended the use of high performance “Green” building standards in previous state plans. These standards will be phased in beginning with state funded buildings approved for construction after the regulations are approved in late 2007. The CEAB encourages the expanded use of renewable energy sources and supports the goals and programs of the Connecticut Clean Energy Fund. There is a moratorium on the siting and construction of new nuclear generating facilities until the issues concerning the disposal of high level nuclear waste have been resolved. Furthermore, CEAB supports the use of preferential criteria standards for selections energy projects based on least cost and least impact on the environment.

**Name** Philip C. Armetta  
**Company** Dainty Rubbish Service, Inc.  
**Town** Middletown

**Written Comments**

**Summary of Comments:**

- Requested that the board acknowledge the significant contribution that the existing Waste-to-Energy plants make toward supporting Connecticut’s power needs, environment needs (over landfills) and its economy.
- Supported the expansion of existing Waste-to-Energy facilities to handle the full volume of waste created by the residents and businesses of Connecticut.
- Recommended that Connecticut develop a “Zone System” so communities would haul their trash to the closest Waste-to-Energy facility in order to save trucking fuel, reduce emissions and lower costs.

**Board Response:**

Trash to energy provides over 75% of Connecticut’s Class II renewable energy or approximately 184 megawatt or 2.7% of the total energy sold in Connecticut. In December 2006, the Connecticut Department of Environmental Protection adopted the State Solid Waste Management Plan (SWMP or Plan). This Plan will be the basis for Connecticut’s solid waste management planning and decision-making now through the year 2024. The SWMP calls for reducing the amount of waste generated, in part by significantly increasing the rate of recycling and waste diversion to 58%. The Plan envisions that the State will first maximize efforts to reduce the amount of waste generated or needing disposal, in order to avoid, as much as possible, the need for new municipal solid waste (MSW) disposal facilities in Connecticut. By adopting

the 58% diversion disposal rate, the State continues its strong commitment to the environment and achieves self-sufficiency in managing the MSW that is generated within Connecticut. By achieving a higher recycling rate, the SWMP also supports the Connecticut Climate Change Action Plan 2005 that called for an increase in recycling and source reduction of MSW to achieve significant greenhouse gas reductions. If the State moves forward and dramatically increase the recycling rate, the State can avoid the need for additional disposal facilities. The CEAB recognizes that the energy generated by the in-state MSW resource recovery facilities helps to meet Connecticut's growing energy needs and that extracting this energy from waste material is consistent with the statutory solid waste management hierarchy. However, the hierarchy also recognizes that the most environmentally preferable means for dealing with MSW is not to produce it to begin with and the next best management method is recycling. Your recommendation to create a "Zone System" is an issue beyond the scope of this energy plan. A zone system could be interpreted as "flow control", a concept that is subject to strict constitutional scrutiny because of its potential impacts on interstate commerce.

The *State Solid Waste Management Plan: Amended December 2006* and the associated hearing report is available at [www.ct.gov/dep](http://www.ct.gov/dep).

<b>Name</b>	Jack Solomon	<b>Written Comments</b>
<b>Company</b>	Self	
<b>Town</b>	East Hampton	

**Summary of Comments:**

- Supported the use of wind power in Connecticut.
- Supported the use of natural gas combined cycle system supplied by liquefied natural gas depots.
- Supported investments in energy efficiency and alternative energy, but is concerned that these investments may not be cost effective if oil and natural gas prices drop.

**Board Response:**

The board supports the development of renewable energy projects including wind energy; however studies of the wind resources in Connecticut demonstrate that wind conditions are not capable of powering large wind farm turbines similar to those in upstate New York and Vermont. Properly planned smaller wind projects sited along the coast or in higher elevations may prove practical and are supported by incentives from the Connecticut Clean Energy Fund. The board does agree that the current supply of natural gas to the state is limited and new resources will continue to be needed as long as natural gas remains the fuel of choice for generation and heating. The exact nature of the new resources will be examined and evaluated by the appropriate agencies. The CEAB does recommend the expansion of programs that promote energy efficiency and alternative energy and supports the use of public funds to encourage customer investments in these technologies for raising the efficiency of the state, improving air quality and reducing Green House Gas (GHG) emissions.

**Name** Donna Alpert Hamblet  
**Company** Self  
**Town** Danbury

**Written Comments**

**Summary of Comments:**

- Supported demand rates for residential customers especially for large homes.

**Board Response:**

There have been discussions at the Department of Public Utility Control concerning the use of residential rates that have increasing block pricing, although no conclusions have been reached. The board supports time-of-use rates that send customers appropriate signals as to the price of power in the market based on the time of day.

**Name** James O'Reilly,  
Director-Policy, Outreach and Communications  
**Company** Northeast Energy Efficiency Partnerships (NEEP)

**Written Comments**

**Summary of Comments:**

- Supported the 10% by 2010 goals and the long-term RFP for the procurement of resources, especially demand side resources.
- Fully committed to the implementation and promotion of energy efficiency recommendations in this plan including restoring the CEEF.
- Advised that the utilities be consulted and fully included in the development of public education campaigns, because the utilities are the ones delivering the programs and it is important that the CEAB coordinate with them in order to ensure effective and efficient execution of the public education campaign.
- Recommended the board coordinate with Regional Greenhouse Gas Initiative (RGGI) stakeholder groups in order to utilize the allowance auction allocations for consumer benefit, including energy efficiency, thus further improving the environmental quality of the state as well as alleviating high energy costs and improving system reliability.
- Asked the CEAB to commit to holding the New England Independent System Operator (ISO-NE) fully accountable to viewing energy efficiency as a valuable resource that is forecasted and modeled equally to other traditional resources.
- Suggested monitoring the Forward Capacity Market (FCM) through the negotiations over operational details and consider measures to ensure that the FCM works to accommodate customers' needs in Connecticut.
- Encouraged the development of energy efficiency programs for natural gas and oil customers.
- Promoted the use of the Total Resource Cost test to measure energy efficiency program cost-effectiveness.

**Board Response:**

The development of the public education program will include the electric distribution companies, but will also involve other stakeholders in that the energy issues in Connecticut go beyond electric energy efficiency. The Board supports your recommendation to coordinate with RGGI and the development of the Forward Capacity Market. A number of members of the CEAB are currently fully engaged in the development process for these initiatives. Your concern over having demand side activities fully valued as resources is shared by the board, but carries with it the responsibility to develop these programs in a way that they can be held accountable for performance just like supply resources. Developing performance measures that demonstrate the reliability of demand side programs is an area where the experience of NEEP can play an important role. The CEAB agrees with your recommendation to have Connecticut develop natural gas and oil efficiency programs, and to use a Total Resource Cost/Benefit test. The CEAB endorses a comprehensive whole building approach to efficiency, which also includes consideration for integrating on-site renewable energy systems.

<b>Name</b>	Jonathan A Gordon, Manager, External Affairs	<b>Written Comments</b>
<b>Company</b>	NRG Energy Inc.	
<b>Town</b>	Middletown	

**Summary of Comments:**

- Expressed concern over the generic recommendation to reduce the use of fossil fuels, rather than addressing each fuel individually for its attributes and impacts.
- Suggested that increased usage of coal for electric generation in fact could be a key piece of the solution for increasing fuel diversity and stabilizing the cost of generating electricity and ultimately stabilizing energy prices to consumers in Connecticut. Suggestion includes the use of Integrated Gas Combined Cycle (IGCC) or “clean coal” generation technology
- Recommended further emphasis and strategic recommendations relative to achieving fuel diversity.
- Recommended including a proposal to update the aging energy infrastructure in Connecticut in the report.

**Board Response:**

In an effort to address fuels used in Connecticut, the CEAB structured the 2007 report into sections addressing issues related to each fuel. The board supports your recommendation to place emphasis and develop strategic recommendations relative to achieving fuel diversity and updating the aging energy infrastructure in Connecticut. The board agrees that repowering older inefficient facilities is a key element to Connecticut’s achieving energy independence in the coming years as are efforts to diversify our fuel requirements. The environmental issues concerning waste streams from generating electricity using IGCC “clean coal” technology have yet to be resolved. CEAB supports the use of preferential criteria standards for the selections of energy projects based on least cost and least impact on the environment.

**Name** Ruth Ann Wiesenthal-Gold  
**Company** The Woodlands Coalition  
**Town** Palm Bay, Florida

**Written Comments**

**Summary of Comments:**

- The Woodlands Coalition commended the board for a plan that is more professional, independent, and directed by setting priorities, with quantitative goals and timetables.
- Recommended a more adequate public education campaign to include outreach to the public, not just efforts by the state's energy bureaucracy. Programs should reach state and local environmental groups and their members as well as municipalities and their citizens.
- Proposed that outreach should educate the media; provide teacher education; publicize Clean Energy Communities and Clean Energy Options campaigns; and provide education for municipal public works officials and facilities planners.
- Recommended the development of public interest demand response resource aggregation programs for the residential market.

**Board Response:**

The board realizes that educational programs aimed at changing consumer behavior are in many ways more important than programs that install new technology. As you noted, in the strategy section of the report, the board cited the development of public education for all energy users as crucial to achieving our goal of a more sustainable energy future.

**Name** Reed Hayes  
**Company** DG Power Systems  
**Town** Lewiston, PA

**Written Comments**

**Summary of Comments:**

- Recommended net metering for all CHP 100 KW or less to promote the installation of small packaged distributed generation.
- Suggested making interconnection easy by standardizing interconnection and pre-qualifying packaged technologies.
- Recommended increased subsidies for small power systems, especially in the transmission congested areas.

**Board Response:**

The CEAB agrees with your recommendation concerning net metering and has recommended increasing the net metering to 1 MW for renewable energy projects. CHP, with 50% seasonal efficiency, is considered a Class III renewable in Connecticut. Therefore, CHP would qualify if this recommendation is accepted. It is also recommending that all units up to 5 MW use uniform interconnection standards. At this point the board feels the incentive level for distributed resources is cost justified and adequate to influence the market.

## **Letters from a group of concerned individuals**

The following individuals submitted identical letters encouraging specific strategies to improve and expand energy efficiency, demand reduction, renewable energy and distributed resources programs.

<b>Name</b>	Christina Lumbreras	<b>Written Comments</b>
<b>Representing</b>	Self	
<b>Town</b>	New Britain, CT	
<b>Name</b>	Gail V. Bennett	<b>Written Comments</b>
<b>Representing</b>	Self	
<b>Town</b>	Hartford	
<b>Name</b>	Marianne Stieglitz	<b>Written Comments</b>
<b>Representing</b>	Self	
<b>Town</b>	Newington	
<b>Name</b>	Lynne Borsa	<b>Written Comments</b>
<b>Representing</b>	Self	
<b>Town</b>	N. Hartford	
<b>Name</b>	Richard Stanley	<b>Written Comments</b>
<b>Representing</b>	Self	
<b>Town</b>	West Simsbury	
<b>Name</b>	M. Renee Taylor	<b>Written Comments</b>
<b>Representing</b>	Self	
<b>Town</b>	Windsor	
<b>Name</b>	Sally Morrison	<b>Written Comments</b>
<b>Representing</b>	Self	
<b>Town</b>	West Hartford	

### **Summary of Comments:**

- Supported legislation to require utilities to achieve cost effective energy efficiency and demand reduction activities.
- Supported placing priority on distributed resources and renewable energy before investing in new power plants and natural gas infrastructure.
- Recommended implementing least-cost procurement standards for utilities to acquiring electric or gas supplies.
- Suggested providing performance incentive to encourage the utilities to minimize customer costs.
- Recommended restoring the Electric Efficiency Program Funds. Consumers save four dollars for every one-dollar invested in these programs.
- Supported expanding natural gas efficiency programs and establish heating oil efficiency programs. Provide information and financial assistance to consumers and businesses.
- Suggested the adoption of new energy efficiency standards for furnaces, boilers, etc.
- Recommended decoupling the energy-wasting link between profits and increased energy sales for electric and gas utilities.
- Supported mandating energy efficient Green building standards for new or renovated schools.

- Suggested that distributed power generation and renewable energy should also be included in procurement plans.
- Suggested that distributed generation can be sited precisely where the energy is needed, reducing strain on the electric grid during peak demands.
- Recommended that incentives should be provided especially for solar photovoltaic systems, which can be most beneficial during peak summer time periods.

**Board Response:**

The board supports recommendations to improve and increase programs that encourage energy efficiency, demand management, and the installation of renewable and distributed resources. The CEAB has developed a set of preferential criteria for encouraging proposals for meeting electric growth in a way that is both least cost and most favorable to the environment. Many of the initiatives you suggested have been included in the 2007 plan as strategies for mitigating the uncontrolled growth in electric demand and postponing the need for building new central power plants. These strategies include restoring the electric energy efficiency funds, initiating natural gas and heating oil conservation programs, improving appliance standards, expanding the use of renewable energy sources and promoting distributed generation, especially combined heat and power. The board also supports your recommendation to mandate Green, environmentally friendly, high performance school building standards. Renewable energy resources are currently required in the utilities procurement plans under the Renewable Portfolio Standards (RPS). The issue of decoupling of utility profits from electric sales is a topic that is being studied in depth at the Department of Public Utility Control. All regulated utilities in Connecticut are currently evaluated by the DPUC using a Performance Based Rate structure in order to encourage efficiencies that pass savings on to ratepayers.