



Comments on Integrated Resource Plan Roger Smith, Campaign Director, Clean Water Action

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Clean Water Action is a national environmental non-profit with 25,000 Connecticut members. We have worked on power plant and energy related issues in Connecticut since 1998. Since 2003, Clean Water Action staff have promoted clean energy and energy efficiency at the town and individual level through the 20% by 2010 clean energy initiative.

Clean Water Action's comments to the CEAB:

1. Provide clear recommendations to implement "efficiency first" provisions of PA 07-242

The CEAB is statutorily obligated to prove an energy plan which minimizes energy costs to consumers while meeting the state's global warming and air quality standards. We ask the CEAB to recommend specific annual increases in energy efficiency/demand side investments for electricity as they represent a least-cost strategy for consumers, and not leave such matters to the DPUC to determine, as the legislature clearly placed this authority within the CEAB.

We are concerned that this plan has more recommendations regarding areas of further study than a concrete plan to implement the efficiency measures we know are cost-effective, reliable, feasible and cheaper than any supply alternative. We cannot wait until the 2010 plan to move forward with the implementation of increased efficiency.

2. Please correct statements regarding CT renewable resource potential

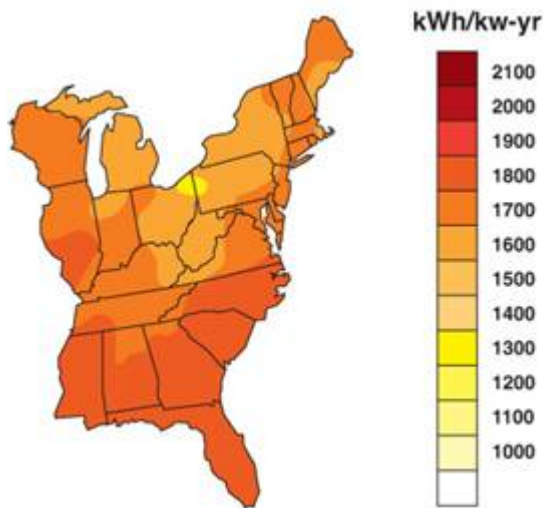
ES-2 states:

"Connecticut has very limited in-state renewable resource potential other than fuel cells. Although qualified resources from outside Connecticut can help the state meet its Renewable Portfolio Standard (RPS), there is substantial uncertainty whether there will be sufficient resources developed to meet region-wide demand for renewables. New transmission could enable the development and integration of out-of-state resources."

Actually, Connecticut's primary indigenous renewable resource is solar energy, both in the form of solar thermal and solar electricity. Solar thermal (heating/hot water) was not mentioned at all as a resource in this report and solar electricity was barely addressed. The draft March 2009 KEMA study "Sustainable Solar Strategy for Connecticut, Prepared for the Long-Term Sustainable Solar Strategy Workgroup" states on page 2-7:

"[The] technical potential for rooftop solar photovoltaic (PV) installations in Connecticut, which is simply a measure of the estimated number, configuration, and area of rooftops on residential and commercial buildings, was estimated at about 4,200 MW in 2008. This represents about 63% of total electricity demand in Connecticut as of 2008. Therefore, at least in theory, Connecticut could supply

the majority of its electricity demands through solar power. In reality, of course, the actual market penetration will be dependent upon a number of other factors.”



Solar works well in CT- CT has better access to sunlight than world-leader Germany. New Jersey is second to California in the US for solar installations and MA has aggressive solar goals

While we will not be able to ramp-up solar photovoltaics to this scale overnight, with the right set of policies, solar PV could play a key role as a fuel and emissions-free “peaking” resource, and build the in-state industry to a scale where it is cost-competitive with traditional generation. We ask the CEAB to incorporate the analysis and recommendations from the “Long-Term Sustainable Solar Strategy Workgroup study” into the next Integrated Resource Plan.

3. Limit utility influence in the final CEAB plan

As you are aware, there have been a variety of efforts to consolidate energy planning and implementation in Connecticut during this legislative session. We are concerned that while superior to last year’s iteration, the plan as drafted by the EDCs is overly biased towards the interests of the utilities related to transmission, and transmission to import renewable energy, and that if this focus is present in the final version will undermine the potential of the CEAB to serve as the entity to conduct state energy planning. We also ask CEAB to recommend how it needs to be modified to address energy issues broader than electric generation, particularly space heating and transportation.

4. Nuclear Energy- match the text with the recommendation

The nuclear energy section in this plan begins with a litany of problems with the technology- a 15 year lag before a plan is built, existing statute making a new plant illegal, the lack of any place in which to store high-level waste for the foreseeable future, siting problems, public opinion, safety concerns, extremely high (and “highly uncertain”) capital costs, and uncertain demand for the plant’s output if completed. The net impact of these issues makes a new plant impossible for a private entity to finance.

Given all of this, we do not understand why 5-13 recommends the following: “One of the most important steps may be to identify and ultimately enable a cost recovery approach that will be attractive to a potential developer, financing entities, and electricity consumers. If that is in place, the developer may be willing to pursue some of the other steps.”

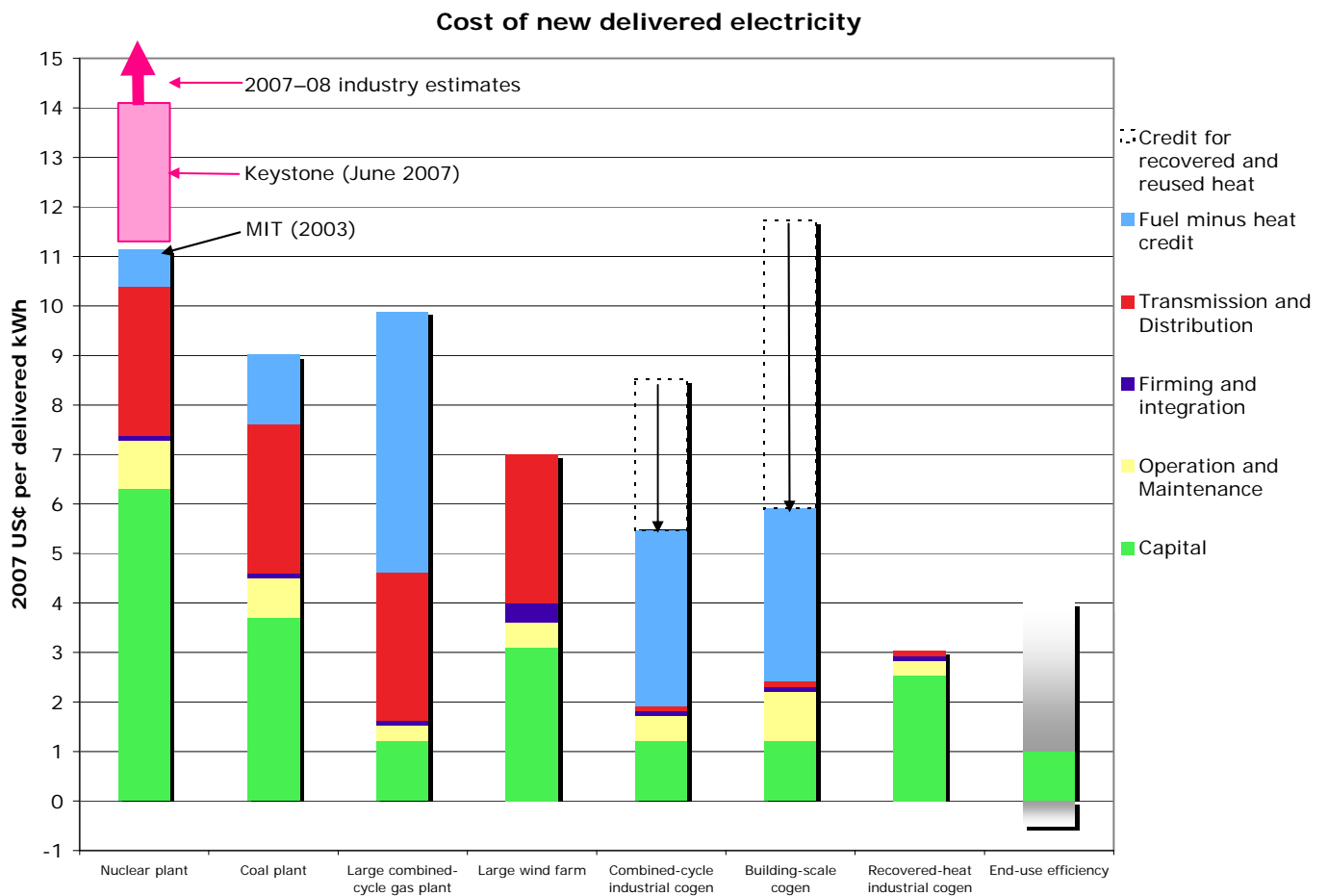
Before recommending study on how to ensure captive ratepayers pay for a new nuclear reactor we would ask CEAB to quantify how building such a plant would be a least-cost way to meet Connecticut’s global warming, air quality and energy goals, given the alternatives.

We also question why almost every reference source in this section is from the nuclear industry and why the report cites paid nuclear industry consultant Patrick Moore as a representative of the environmental community.

We recommend consulting the following reports:

The Nuclear Illusion, Amory B. Lovins, Imran Sheikh, *Ambio*, November 2008

http://www.rmi.org/images/PDFs/Energy/E08-01_AmbioNucIllusion.pdf



Micropower Database: How Distributed Renewables and Cogeneration are Beating Nuclear Power Stations Download from: <http://www.rmi.org/sitepages/pid256.php>

Nuclear Power and Global Warming, Union of Concerned Scientists position paper
http://www.ucsusa.org/nuclear_power/nuclear_power_and_global_warming/ucs-position-on-nuclear-power.html

5. Add Recommendations to reduce natural gas consumption:

We also ask the CEAB to implement CT's laws to achieve all cost-effective efficiency for both electricity *and* for natural gas for heating. The cost-benefit of the latter may be more significant than for the former. Connecticut needs to stop dealing with energy issues in narrow silos.

We ask the CEAB recommend specific funding for a ramp-up of natural gas efficiency investments to capture all cost-effective gas efficiency. Focus any additional study on the benefits of expanded natural gas heating efficiency programs, including support for technologies made possible by such programs, including geothermal and solar thermal. Analyze the impacts of natural gas conservation on electricity rate volatility and energy security.

Reviewing the section of PA 07-242 which created the CEAB, it speaks generically to "energy," rather than electricity:

Sec. 51. (NEW) (*Effective from passage*) (a) The electric distribution companies, in consultation with the Connecticut Energy Advisory Board, established pursuant to section 16a-3 of the general statutes, as amended by this act, shall review the state's energy and capacity resource assessment and develop a comprehensive plan for the procurement of energy resources, including, but not limited to, conventional and renewable generating facilities, energy efficiency, load management, demand response, combined heat and power facilities, distributed generation and other emerging energy technologies to meet the projected requirements of their customers in a manner that minimizes the cost of such resources to customers over time and maximizes consumer benefits consistent with the state's environmental goals and standards.

Thank you for consideration of our comments,

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