

BECKER BECKER

MEMORANDUM

To: Energy & Technology Committee
From: Bruce Becker, Becker and Becker Associates, Inc.
Re: Comments on Raised Bill 1130

My name is Bruce Becker, and I am the president of Becker and Becker Associates, an integrated architecture and development firm based in Fairfield. My firm is currently constructing a large transit-oriented, mixed-use development in downtown New Haven, which is designed to be a LEED-ND Gold project (called "360 State Street"). This project will include a 400 kW fuel cell and we hope to include a range of energy efficiency measures. We applied to the Electric Efficiency Partners program for grants for numerous demand reduction technologies and were designated a General Partner, but received no funding.

We support many of the changes to the Electric Efficiency Partners Program outlined in S.B. 1130. Specifically, we support (1) the removal of language referencing whether a project "has received or is receiving" funding through the C&LM program; (2) the establishment of clear guidelines with timetables for the administration of applications; and (3) the requirement for a one-to-one payback for projects incorporating Class I renewable energy sources.

1. Conservation and Load Management Program Conflict

I support the change to the statute that eliminates the requirement that projects not have "received or be receiving" funding through the Conservation and Load Management Funds in order to receive funding through the EEP program. This requirement led to undue conflict when my firm applied for funding through the EEP program. We support the need for preventing "double-dipping" into separate funding programs, but the explicit language severely limited the potential scope of the EEP program. Several technologies for which we applied for funding were deemed ineligible for EEP funding because they were "eligible" for C&LM funding, even though no funding had been received. Removing this language will help to clarify that the intent of this program is to deploy a broad range of technologies that will reduce peak demands, regardless of any potential eligibility under other programs.

2. Clear Guidelines and Timetables

I am glad to see that this bill includes several changes which will help to streamline the application process for the EEP program. Having a clear process, with a timeline, will help applicants to quickly move through the process and avoid expensive legal fees. The pre-application review will also help to expedite the process and avoid the difficult quasi-judicial process that is mandated by the DPUC for its docketed proceedings.

3. Different Payback Requirement for Projects with Renewable Energy

Establishing a different baseline requirement for projects that incorporate renewable energy will further encourage the use of these technologies. Furthermore, projects like 360 State Street that include fuel cells are particularly important places to employ demand reduction

technologies. Due to the constant amount of energy that is generated by fuel cells, buildings that use this technology must import electricity during peak hours and export energy during off-peak hours. Using technologies that are specifically targeted to reduce the peak demand can help to level off this ebb and flow, creating less strain on the grid during peak hours and reducing the amount of energy that is exported during off-peak hours.

Please feel free to contact me if you have any questions about our process with the EEP program or 360 State Street.

Thank you.