



# CONNECTICUT LEGAL SERVICES

A PRIVATE NONPROFIT CORPORATION

SHIRLEY BERGERT, DIRECTOR, PUBLIC BENEFITS TASK FORCE

872 MAIN STREET P.O. BOX 258 WILLIMANTIC, CT 06226-258

TELEPHONE (860) 456-1761 EXT. 115 OR 1-800-413-7796 (CLIENT TOLL-FREE LINE)

FAX (860) 456-7420

E-MAIL SBERGERT@CONNLEGALSERVICES.ORG

SHIRLEY BERGERT  
DIRECTOR OF  
PUBLIC BENEFITS TASK FORCE

ANNE LOUISE BLANCHARD  
LITIGATION DIRECTOR

CATHERINE CUSHMAN  
CHERYL DIANE FEUERMAN  
BET GAILOR  
JOELEN J. GATES  
REBECCA LOOS  
MYKLYN MAHONEY  
SAMUEL T.D. NEVES, JR.  
ROYAL STARK  
WENDY W. WANCHAK  
ATTORNEYS AT LAW

CAROLE MASTERS  
VOLUNTEER ATTORNEY

THOMAS W. CRATTY, JR.  
LAUREL J. FREEMAN  
PARALEGALS

LUZ OSUBA  
HEROILDA RIOS  
LEGAL ASSISTANTS

ADMINISTRATIVE OFFICE  
62 WASHINGTON STREET  
MIDDLETOWN, CT 06457  
(860) 344-0447

AARON BAYER  
BOARD CHAIR

STEVEN D. EPLER-EPSTEIN  
EXECUTIVE DIRECTOR

## LAW OFFICES

211 STATE STREET  
BRIDGEPORT, CT 06604

16 MAIN STREET  
NEW BRITAIN, CT 06051

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NEW LONDON, CT 06320

20 SUMMER STREET  
STAMFORD, CT 06901

85 CENTRAL AVENUE  
WATERBURY, CT 06702

872 MAIN STREET  
WILLIMANTIC, CT 06226

## SATELLITE OFFICES

5 COLONY STREET  
MERIDEN, CT 06451

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MIDDLETOWN, CT 06457

98 SOUTH MAIN STREET  
SOUTH NORWALK, CT 06854

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TORRINGTON, CT 06790

155 WEST MAIN STREET  
ROCKVILLE, CT 06066



## Comments Regarding Bills #1129 and 1130 AN ACT CONCERNING ENERGY AND THE STATE'S ECONOMY Before the Energy and Technology and Commerce Committees March 17, 2009 Prepared by Shirley Bergert<sup>1</sup>

These identical bills modify the CT Energy Efficiency Partner program.

### Section 1:

**(a): Include the ECMB as a "partner."** The proposal expands the entities included as partners, but does not include the Energy Conservation Management Board (ECMB; CGS §16-245m), responsible for extensive demand side efficiency programs, consistently rated among the top programs in the country. The ECMB, a state created entity, should be part of any entity dealing with efficiency in order to ensure coordination and integration of its programs with other available programs.

**(h): Include the ECMB as a member of the Energy Innovations Council,** if such council is created. For the same reasons articulated above for (a), the ECMB should be a member of any body effecting demand side efficiencies. Having said that, we have over a dozen entities dealing with energy policy in CT and this risks development of disjointed policy and practice in the state. We suggest consideration be given to assigning the responsibilities for this proposed council to one of the existing entities.

**(i):** This section has two issues of concern:

- **Payback ratio should not be reduced:** This section reduces the payback ratio from 2-to-1, an already low ratio, to 1.5-to-1 or 1-to-1. CEEF programs achieve a 4-to-1 ratio, which should serve as a guide. EEPs are being funded with ratepayer dollars and should reflect the highest achievable benefit for ratepayers. Even if a ration lower than 4-to-1 could be justified, it should not be lower than existing law provides, particularly since it is being funded by ratepayers.
- **Maintenance of technology needs "teeth":** The bill requires that EEPs maintain the technology receiving funding for a period sufficient to achieve the expected benefits, but it has no protections for ensuring this is the case. In the not-too-distant past, CT invested in job development without enforcement teeth and many promised jobs either weren't developed or were not maintained. We should learn from past mistakes, providing a consequence if the technology is not maintained long enough to achieve expected benefits.

**(p): Support distribution company ownership of generation:** This section authorizes electric distribution companies to own Class I renewable generation facilities. Recovery is based on cost plus a reasonable return. This will encourage development of renewable generation while protecting CT ratepayers from excessive profits.

<sup>1</sup> Shirley Bergert serves: as the residential representative on the Energy Conservation Management Board overseeing the expenditure of ratepayer conservation funds in Connecticut Energy Efficiency Fund (Conn. Gen. Stat. § 16-245m); as the low income representative on the Fuel Oil Conservation Board (Conn. Gen. Stat. § 16a-22f); on the Low Income Energy Advisory Board (Conn. Gen. Stat. § 16a-41b); and on the Advisory Board of the Institute for Sustainable Energy at Eastern Connecticut State University.