



# Rivers Alliance of Connecticut

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TESTIMONY FOR ENERGY & TECHNOLOGY COMMITTEE PUBLIC HEARING March 15, 2011

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## RE SB1 AAC Connecticut's Energy Future

For Chairmen Sen. John Fonfara and Rep. Vickie Nardello, and Committee Members

*Rivers Alliance of Connecticut is the statewide, non-profit coalition of river organizations, individuals, and businesses formed to protect and enhance Connecticut's waters by promoting sound water policies, uniting and strengthening the state's many river groups, and educating the public about the importance of water stewardship. Our 450 members include almost all of the state's river and watershed conservation groups, representing many thousand Connecticut residents.*

### DIRECTORS

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SB 1 promises to invigorate Connecticut's clean energy industry. We have long advocated for a state energy department, and support the creation of DEEP.

We are extremely concerned and surprised by the proposal to elevate *all* hydropower to Class 1. This move will batter the market for *all* Class 1 renewable energy credits. If HydroQuebec and other high-impact hydro generators are eligible for Class 1 status, they will qualify for such a large quantity of Class 1 RECs that REC value will tank. The one positive outcome would be that electric rates would probably drop. (The cost of buying RECs to meet energy portfolio standards is passed on to ratepayers.) But even this might be gamed by large generators so as to keep REC prices artificially high.

### EXECUTIVE DIRECTOR

Margaret Miner

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The negative outcome would be near elimination of incentives to create Class 1 generation in Connecticut and violation of the principle that Class 1 benefits are for high-quality, low-impact projects. The generally accepted standard for green, low-impact hydropower is certification by the Low-Impact Hydropower Institute (LIHI). This non-profit was created by American Rivers and Green Mountain Energy to establish a market for the best (least harmful) hydropower. One hydro plant in Connecticut has been certified for a number of years. Another, on the French River, is in process of certification, and one (possibly two) facilities in Collinsville are on a path for LIHI approval. Meanwhile, efficiency upgrades at existing run-of-the-river plants may also be candidates for LIHI certification.

A tax-exempt  
organization under  
501 (c) (3) of the  
Internal Revenue  
Code

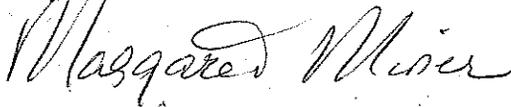
From the point of view of river health, nothing could be worse than encouraging maximum interruption of rivers with new dams and diversions. Dams raise temperature, cut off passage of fish and other wildlife, and degrade water quality.

Connecticut has moved toward using LIHI standards. Compliance with these standards is required for Clean Energy Fund support and for most hydro projects on state-owned dams. We urge the Committee to require that all new and Class I hydropower in Connecticut meet LIHI standards.

On another matter, elimination of the Council on Environmental Quality would be a terrific loss to the people of the state and to state officials. There is no way that DEP employees could pick up the work of fielding citizens' complaints, negotiating multi-agency resolution of problems, tracking progress on the state's environmental goals, overseeing the Connecticut Environmental Policy Act, monitoring the DEP, and so forth.

Finally, SB 1 does not address the problem of the dysfunctional permitting system for power plants. The present approach ignores the importance of early scoping, often leaving the most sensitive permits to last. No one is responsible for analysis of net environmental gain and loss on proposed projects. No one is responsible for coordinating permit applications. No one is responsible for oversight and enforcement of management plans. The results in Plainfield and Middletown (and elsewhere) have been battles over water, loss of capital investments, serious environmental impairments, human suffering and loss of life. We hope that reform of this process will be a priority for DEEP.

Many thanks for work for the state of Connecticut.

A handwritten signature in cursive script that reads "Margaret Miner".

Margaret Miner, Executive Director