



**Testimony of AARP on SB 415**

**An Act Concerning the Operations of the Department of Energy and Environmental Protection, the Establishment of a Commercial Property Assessed Clean Energy Program, Water Conservation and the Operations of the Clean Energy Finance and Investment Authority.**

**Energy and Technology Committee**

**March 15, 2012**

AARP is an organization that helps people 50+ live their best life. We are a nonprofit, nonpartisan social mission organization with nearly 600,000 Connecticut members. AARP has major concerns with various sections of SB 415. We do not believe many of the changes are prudent given the comprehensive legislation that passed last session (PA 11-80). We will outline some of our concerns in our testimony today.

Section 2: This section would eliminate a number of ethics provision for Public Utilities Regulatory Authority (PURA) directors and staff, including the revolving door ban and lobbying restrictions. AARP opposes the elimination of essential prohibitions on conflict of interest and outside employment.

This section would also allow procurement manager to be assigned responsibilities beyond procuring power for standard service. The creation of the procurement manager was an essential provision that AARP fought for in PA 11-80 and we oppose any change to the scope of the responsibilities of the procurement manager before the position is even fully functioning. We believe that the procurement manager should procure electricity and perform that job alone.

Section 2 also requires that PURA decisions be guided by DEEP's statutory goals, the goals of the comprehensive energy plan and the Integrated Resource Plan. AARP recognizes that when Public Act 11-80 reorganized the former Department of Public Utility Control and the Department of Environmental Protection there was the intent to create a policy division of the new DEEP. This policy division is a critical step that AARP fully supports. We believe however, that the best way to regulate utilities is to have an autonomous PURA get recommendations from the policy division of DEEP and weigh those recommendations when making a ruling not being bound by the policy division.

Sections 19 & 20: These sections contain provisions that would turn several required "public hearings" into "public meetings". This would not be in the best interests of ratepayers as a public meeting implies a lower evidentiary standard and participation. AARP believes that it would be more beneficial to have traditional proceedings that allow for evidence and comment and deliberation. AARP also opposes shortening the comment period on the Integrated Resource Plan (IRP) from 45 to 30 days in section 20. This would further limit public participation when developing of the IRP. AARP would request an IRP process and Comprehensive Energy Plan (CEP) process that is more consumer friendly and allow better ratepayer input into the plans.