



**Testimony of Roger Smith, Co-Director, Clean Water Action
Energy and Technology Committee March 7, 2013**

**Regarding Raised Bill No. 6535
AN ACT REDEFINING CLASS I RENEWABLE ENERGY SOURCES.**

Clean Water Action is a national environmental non-profit with 15,000 Connecticut members which has worked on energy policy in Connecticut since 1997. We have also worked closely with towns and individuals to support clean, renewable energy.

We are concerned that this bill, if approved, would lead to significant unintended consequences for the development of renewable power in Connecticut.

1. Support Anaerobic Digestion

We strongly support the use of anaerobic digesters to turn organics like food waste and even sewage sludge into compost and methane gas. The gas can be burned to generate electricity. This technology is widely used in Europe and is a huge part of Connecticut's waste future.

We believe that the current definition of Class I renewable energy should already include anaerobic digesters, under the "low emission advanced renewable energy conversion technologies" definition.

In reviewing PURA's RPS website¹, it doesn't appear that any developer of anaerobic digestion ever sought approval for this technology. We don't think it's necessary but would support a clarification that the burning of methane from anaerobic digestion to produce electricity qualifies for Class I credits.

2. Oppose Thermal Energy Changes

The use of useful thermal energy to generate electricity is clearly already a Class I eligible resource. On the same PURA webpage, UTC PureCycle was approved in Docket 05-01-11 for Class I for a technology that uses waste heat for electricity. Other developers could simply seek a ruling to count their technology and projects as Class I as well.

As drafted, the thermal sections of this bill appear to allow any efficient heating system in Connecticut to count for renewable electricity credits, even though they are not powered in a renewable way, and neither produce nor displace electricity use (as displacing "fuel" is allowed).

Class III of the RPS already rewards combined heat and power systems for their use of waste heat. If the intent of this section is to support these type of units, expanding Class

¹ <http://www.ct.gov/pura/cwp/view.asp?a=3354&q=415186>

III would do so without risking turning Class I of the RPS into a subsidy for every heating system in Connecticut.

3. Oppose Diesel

We are concerned that allowing biodiesel as Class I renewable is another dilution of the definition of the RPS beyond something that incentivizes renewable electricity generation. Is the intention to subsidize biodiesel used in trucks? It isn't clear here. Diesel generators are among the dirtiest ways to produce power, and biodiesel isn't inherently much cleaner than conventional on-road diesel. Much biodiesel is also made from palm oil that is imported from southeast Asia from destroyed rainforest. All biodiesel isn't created equally.

4. Oppose Geothermal

Ground and air source heat pumps *consume* electricity to produce heat, so they don't remotely meet the definition of an energy source that would earn Class I RECs. These technologies are already subsidized by the Energy Efficiency Fund or Class III (for projects opting out of Efficiency Fund incentives.)