

Testimony of NRG Energy, Inc.

To: Joint Committee on Energy and Telecommunications
From: Raymond G. Long, Vice President, Government Affairs
Date: March 7, 2013
RE: [H.B. No. 6360](#) AN ACT CONCERNING IMPLEMENTATION OF
CONNECTICUT'S COMPREHENSIVE ENERGY STRATEGY. (ET)

NRG Energy, Inc. (NRG) is a national developer and operator of power plants. NRG operates a portfolio of 8 facilities in Connecticut in the communities of Middletown, Norwalk, Montville, Milford, Branford, Cos Cob and Torrington. Several of these power generation facilities use low sulfur oil, referred to as number 2 heating oil, for starting up.

As required by Connecticut statute, NRG presently utilizes low sulfur number 2 oil. The current statutory regime requires that NRG switch to an ultra low sulfur oil of 15 parts per million on July 1, 2014.

Section 18 of HB 6360 would, among other things, change the implementation date for the use of the ultra low sulfur oil one year earlier – to July 1, 2013. Moving the implementation date up by one year is very problematic. NRG has already purchased and stored the low sulfur oil at tanks at two of NRG's Connecticut facilities. This oil was purchased in reliance on the current statute. NRG has always planned to comply with the July 2014 date for implementation of the ultra low sulfur oil obligation.

Moving the compliance date up by one year – with only four months notice – would require NRG to purchase new inventory, and to spend unnecessary funds to truck our existing inventory out of Connecticut and try to either resell it or blend it with other oil products.

I respectfully request that if the Committee plans to move forward with Section 18 of this legislation, that power generation facilities be exempted from the earlier compliance date. NRG is prepared to comply with the State's current statute by utilizing ultra low sulfur oil beginning on July 1, 2014.

Please feel free to contact me directly with any questions you may have.

Thank you for your time and consideration.