

**Testimony of GDF SUEZ Energy North America regarding Raised Bill No. 6441  
An Act Concerning the Dam Safety Program**

GDF SUEZ Energy North America (GDF SUEZ NA) is the owner of FirstLight Power Resources, Inc. (FirstLight), which owns or operates approximately 1,500 MWs of hydro-powered generating capacity in New England. FirstLight's Connecticut fleet includes 10 hydroelectric facilities and their associated dams and generators. In total, FirstLight operates 30 hydroelectric generators in the state.

The Federal Power Act authorizes the Federal Energy Regulatory Commission (FERC) to regulate non-federal hydroelectric projects. Six of our company's ten facilities meet these criteria and are licensed by the FERC. Included in the FERC regulatory mandate are specific requirements for protecting non-power resources including fish and wildlife habitat, irrigation, water supply, recreation, flood control, and water quality.

FERC retains jurisdiction over the safety of its licensed facilities and as such Raised Bill No. 6441 does not have any impact on these facilities. The remaining four facilities in Connecticut are currently subject to State inspection. Two of the projects have operating fish passage systems that are subject to National Fish and Wildlife Service as well as CTDEEP oversight. FirstLight works with the CTDEEP and these agencies on an on-going basis to improve the passage of fish and eels at these plants.

It is important to note the provisions of Raised Bill No. 6441 mirrors to a major extent the inspection requirements of the FERC. For instance, FirstLight already must obtain permission from FERC to alter, rebuild, repair or remove licensed dams in their jurisdiction. FirstLight's dams are inspected by the FERC annually. FirstLight also performs certain other dam inspections with its own staff. These inspections are then certified by independent professional engineers and reviewed by FERC.

We also maintain and regularly update Emergency Management Plans (EAPs). These plans include input from local stakeholders, including the State Office of Emergency Management. As required by FERC regulations, FirstLight conducted a major Functional Exercise this year that simulated a major breach of one of the FirstLight dams. This exercise was attended by state and local emergency management personnel within the affected areas. The exercise was observed and critiqued by the FERC.

We appreciate the Committee's efforts to improve dam safety in Connecticut and would be happy to continue to work with the Committee as well as the DEEP to achieve that goal.

Thank you.

Submitted by:

Charles Burnham  
Manager, Government & Regulatory Affairs  
GDF SUEZ Energy North America  
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