



TESTIMONY OF ERIC J. BROWN
ASSOCIATE COUNSEL, DIRECTOR OF ENERGY & ENVIRONMENTAL POLICY
CONNECTICUT BUSINESS & INDUSTRY ASSOCIATION
before the
ENVIRONMENT COMMITTEE
March 15, 2013

Good morning. My name is Eric Brown and I serve as director of energy and environmental policy with the Connecticut Business & Industry Association (“CBIA”). On behalf of our 10,000 large and small member companies throughout Connecticut, we appreciate this opportunity to share our perspective on:

**H.B. 6536: AN ACT CONCERNING GENERAL PERMITS OF THE DEPARTMENT
OF ENERGY AND ENVIRONMENTAL PROTECTION**

CBIA opposes this bill as drafted

This bill proposes new annual fees on businesses that operate currently, or will in the future, under one or more general permits issued by the Department of Energy and Environmental Protection. General permits have become the agency’s preferred tool for complying with state and federal laws requiring a huge range of business operations to be conducted in conjunction with an enforceable permit.

Current law already requires substantial fees at the time the permit is issued or renewed. Most general permits have a duration of 5 years before they must be renewed.

The annual fees proposed by H.B. 6536 amount to a 55% increase in the cost of these each of these general permits over the five year life of the permit. And many businesses are required to have more than one general permit. For example, a company may need a stormwater general permit for rainwater, as well as separate general permits for maintaining equipment, discharging wastewaters, and air emissions.

CBIA understands that this committee is very concerned with DEEP funding – as is the regulated community. But we both are also concerned with the well-being of small businesses in Connecticut and our economy overall. We urge you consider alternative approaches.

For example, one approach we believe may be more efficient and more reasonable would be to modestly increase the registration and renewal fees for these permits and abandoned or make optional the concept of an annual payment which can create administrative costs for both the business and the agency. Raising the existing registration fees by 10% over the five year life of the general permit, (e.g. the equivalent of 2% per year, but payable at the time of registration or renewal, would allow the state (although, unfortunately not necessarily DEEP depending how the legislature allocates the funds) to increase revenues for permit services without putting unreasonable new assessments on our businesses.

CBIA would be glad to work with this Committee and DEEP to explore alternative approaches to the overly burdensome approach proposed in this bill, which in its current form, CBIA opposes.

CBIA appreciates this opportunity to provide testimony on S.B.6536 and for your consideration of our positions.