

ClearEdge Power  
195 Governors Highway  
South Windsor, CT 06074  
(860) 727-2200 Fax: (860) 727-2319



**Testimony of ClearEdge Power  
Regarding**

**Senate Bill No. 353**

***AN ACT CONCERNING THE DEVELOPMENT OF CLASS I RENEWABLE ENERGY SOURCE  
PROJECTS***

**Before the Energy and Technology Committee  
March 4, 2014**

Senator Duff, Representative Reed and members of the Committee:

ClearEdge Power appreciates the opportunity to convey its strong support for *Senate Bill No. 353, An Act Concerning the Technical Development of Class I Renewable Energy Source Projects*.

ClearEdge Power, a company located in South Windsor, CT, Hillsboro, OR, and Sunnyvale CA, employs over 300 people in the development, design, production and service of fuel cells for use in stationary power and heat applications. ClearEdge Power supports the proposed changes within Senate Bill No. 353, "An Act Concerning the Development of Class I Renewable Energy Source Projects".

Today ClearEdge Power is producing fuel cells for stationary applications for energy generation with system efficiencies approaching 90%. Through the use of combined heat and power, our stationary fuel cells provide power and heat with no combustion, minimal noise and ultra-low criteria air pollutants. Our systems also contribute to peak power reduction and can provide off-grid power and heat, enhancing power reliability and overall resiliency within the State.

We support the extension through July 1, 2016 of Connecticut General Statute ("CGS") 16-244v to allow the Electric Distribution Companies ("EDCs") to own and operate Class I generation per section (a) of Section 127 of Public Act 11-80. The proposed bill indirectly recognizes the potential for EDCs to participate in the microgrid program to bolster the resiliency of the State's power system in strategically located areas or within municipalities where the interconnection of several critical loads may be difficult for a public/private sector partnership.

The proposed additional 50MW of Class I generation also helps promote the RPS goals set by the state of Connecticut. The ratepayers of Connecticut can directly benefit from the strategic placement and operation of Class I generation at utility substations, along the commuter rail line and throughout the State to support communities during grid outage events. Overall, utility ownership of Class I generation allows the EDCs to reduce peak power demand where it is most needed, increase grid reliability and install Class I capacity. An indirect result of utility ownership of Class I fuel cells, and

Contact: Lisa Ward  
Email: [lisa.ward@clearedgepower.com](mailto:lisa.ward@clearedgepower.com)  
Website: [www.clearedgepower.com](http://www.clearedgepower.com)

also an indirect ratepayer benefit, is the potential for fuel cells to act as “anchor” points to promote natural gas expansion into areas not currently included in the comprehensive energy strategy.

Lastly, we would recommend clarifying the section (a) of CGS 16-244v language referencing “emit no pollutants” per PURA’s interpretation within Docket No. 12-01-05. In 2012, United Illuminated (“UI”) requested approval from PURA to own Class I generation under Docket No. 12-01-05. Through the docket proceeding, a critical language interpretation of CGS 16-244v was addressed. In Section 2, “Legal Analysis of Proposed Projects,” of PURA’s decision, they approved Class I fuel cells for EDC ownership given the “emit no pollutants” language was linked to the “developer of generation projects” and not “the electric distribution company” language. This decision ultimately distinguished two separate programs within the statute, one of which is EDC ownership of any Class I renewable generation system. Clarifying the intention of the “emits no pollutants” language within the statute will prevent future uncertainties when the EDC’s investigate, develop and request PURA to approve ownership of any Class I generation project. In particular, fuel cells should be specifically listed as a permitted resource for EDC ownership.

Thank you for the opportunity to express our desire for SB 353 to meet the State’s objective of the cleanest and most cost effective energy policy possible. The intent of SB 353 could also facilitate positive economic impacts and job creation and retention in the State of Connecticut. We would be pleased to provide any information to the Committee and the staff in support of the consideration of this bill.

Contact: Lisa Ward

Email: [lisa.ward@clearedgepower.com](mailto:lisa.ward@clearedgepower.com)

Website: [www.clearedgepower.com](http://www.clearedgepower.com)