

TESTIMONY OF ERIC J. BROWN  
CONNECTICUT BUSINESS & INDUSTRY ASSOCIATION  
before the  
ENERGY & TECHNOLOGY COMMITTEE  
March 17, 2015

Good morning. My name is Eric Brown and I am an attorney with the Connecticut Business & Industry Association (“CBIA”) and director of its Environmental Policies Council. CBIA’s mission is to work with our members and public officials to make Connecticut a more attractive location for business investment in order to grow jobs and economic opportunity for those who live here. Our members include businesses from across the state of all sizes and from nearly every industry in Connecticut.

CBIA appreciates this opportunity to provide comment **opposing but requesting modifications for support of S.B. 1078**, An Act Concerning Affordable and Reliable Energy.

Section 3 of this bill proposes to significantly shift in responsibilities for the development of the state’s Integrated Resources Plan, its Procurement Plan and procedures to be followed for implementing these plans - from the Public Utilities Regulatory Authority (“PURA”) to the Department of Energy and Environmental Protection (“DEEP”). The section additionally creates a new role for the General Assembly’s Energy & Technology Committee to “advise the department of their approval or modifications” of proposals selected by DEEP in response to a request for proposals for meeting electric energy needs, capacity needs, renewable requirements, reliability improvement goals, lowering energy costs and reducing greenhouse gas emissions.

Line 90 states that “Proposals selected by the department shall be subject to approval by the Public Utilities Regulatory Authority.” But it is unclear to us how this PURA approval relates to this committee’s “approval” as well as the DEEP’s “final decision” (see lines 113-114).

In short, CBIA is very concerned about the diminution of PURA involvement in the development and implementation of the Integrated Resource and Procurement Plans as envisioned under this bill. At best, section 3 makes the process more cumbersome and

confusing. At worst, it takes much of the process away from the entity which conducts the most thorough and transparent analyses of these plans and associated proposals, and the entity most qualified to determine the cost impacts of all the decisions associated with these plans and proposals, and replaces PURA with a legislative committee and a state agency – neither of which have the resources to conduct the same degree of rigorous review nor necessarily be as highly focused on assessing ratepayer impacts. Those impacts, in our view, need to be paramount at this time when Connecticut’s competitiveness continues to be threatened by our highest in the continental United States (and in some cases beyond) energy costs.

Therefore, CBIA requests section 3 of this bill be omitted or significantly rewritten to clarify approval authorities and to ensure PURA has the primary role in assessing plans and proposals for meeting Connecticut’s energy needs in a cost effective manner. PURA is answerable to both the executive branch (which nominates the commissioners), and to the legislative branch (which approves appointments of PURA commissioners – in addition to any additional directives from the legislature).

CBIA supports section 4 of the bill except:

(1) We strongly believe subsection 4(a) should be more inclusive of a broader range of zero-emission clean energy sources. Specifically, we recommend lines 169 and 170 be modified as follows:

“management and efficiency measures, [or] (5) large-scale hydropower, (6) instate nuclear power, or distributed generation, including but not limited to, combined heat and power.”; and

(2) Subsection 4(b) be modified to explicitly articulate that cost-reduction is one of the priority considerations when reviewing procurement proposals are being evaluated.

Thank you for this opportunity to provide comment and for your consideration of our suggestions.