



**Doosan Fuel Cell America, Inc.**  
195 Governor's Highway  
South Windsor, CT 06074  
T - 860 727 2200

Comments of David Giordano, Government Relations & Business Development

Doosan Fuel Cell America, Inc.

Energy & Technology Committee

**Governor's Bill – SB 9**

March 1, 2018

Chairwoman Reed; Co-Chairs Winfield and Formica, Ranking Member Ackert and other members of the Committee:

Doosan Fuel Cell America appreciates the opportunity to provide comments regarding the **Governor's Bill SB 9 – An Act Concerning Connecticut's Energy Future**. Doosan appreciates the leadership that this Committee has shown in the past legislative session to advance the fuel cell industry in Connecticut through such measures as the extension of the LREC/ZREC program, utility ownership for fuel cells, as well as other fuel cell procurement opportunities.

As you know the Doosan Corporation is a global company with 42,000 employees and worldwide revenue of more than \$20 billion. Our global businesses span a range of products and services in infrastructure support and power generation, including nuclear power, steam turbines, power plant boilers, water desalination, construction equipment, machine tools and engines for a variety of applications. In 2014, Doosan made the decision to invest in Connecticut and acquired the former UTC Power in South Windsor where we now employ 300 people at our fuel cell headquarters at the site of our world-class R&D and manufacturing facility.

Doosan has significant experience in customer-sited behind the meter applications. Our PureCell<sup>®</sup> Model 400 systems operate at more than 50 sites through the U.S. providing nearly 40 MW of power. Worldwide Doosan has more than 210 units deployed producing 100 MW with many more megawatts coming on line in the next year. The reliability and resiliency attributes of our fuel cells are felt during grid outages where our systems continue to run providing essential electricity and heat to critical facilities. Such was the case here in Connecticut during winter storm Alfred in 2011 and Superstorm Sandy in 2012. Doosan fuel cells kept the lights on during these critical times of need.

The State of Connecticut has been one of the most important markets for the emerging fuel cell sector, and fuel cells are contributing greatly to State's goals of reducing greenhouse gas emissions, reducing peak load, and improving the reliability of the electric utility system. Doosan



**Doosan Fuel Cell America, Inc.**  
195 Governor's Highway  
South Windsor, CT 06074  
T - 860 727 2200

fuel cells are currently supplying clean and secure power to a diverse set of customers in a variety of industries across Connecticut such as hospitals, universities, industrial manufacturers, municipalities and high schools, supermarkets, residential buildings and waste water treatment plants.

Specifically, regarding **SB 9 – Section 1: RPS Expansion**, Doosan believes that firm power, provided by fuel cells are a necessity to transition to a 100% renewable world. Also, that firm power should be derived from a non-combustion technology to reduce GHG emissions as well as criteria air pollutants, both something that fuel cells do very well. However, we are very concerned by the recent Comprehensive Energy Strategy where DEEP suggested that fuel cells may no longer be considered a Class I Renewable Energy Resource. This is very troubling during an active RFP as developers and investors weigh the viability of fuel cell projects. The message this sends is that fuel cell projects may no longer receive the Renewable Energy Credits (RECs) at some point during the life of project thus making it unfinanceable. We recommend that this Committee and the General Assembly send a clear signal that it has no intention of reclassifying fuel cells, prior to the final date for RFP submission on April 2, 2108. This would send a message of how important our industry is to the State of Connecticut for many reasons.

Regarding **SB 9 – Sections 4 and 5: Distributed Generation (DG) Tariff Proposal**, Doosan believes the LREC/ZREC program will need to be extended, most likely for two years, while a tariff-based incentive program is developed. We also feel that such a program should be compatible with net metering, rather than a replacement, for behind-the-meter customers to benefit from the energy they produce on site, as they lower their electric bills, reduce GHG and criteria air pollutants, add resiliency and reliability, and most of all save money.

Doosan believes that the State of Connecticut can still be a viable place to do business. However, some consideration needs to be given to a home-grown industry that is providing high-tech manufacturing jobs to not only our employees, but to other local companies that make up our supply chain as well. Therefore, we ask the General Assembly to continue its commitment to the fuel cell industry and do what it can to see that it remains a viable industry for years to come.