



Testimony of Eric Brown
Connecticut Business and Industry Association
Before the Environment Committee
March 14, 2018

The Connecticut Business and Industry Association (CBIA) appreciates this opportunity to comment on:

SB-7, An Act Concerning Climate Change Planning and Resiliency

CBIA opposes sections 2,3,4, 5 and 10 as ill-advised and not directly related to planning and resiliency

Good morning. My name is Eric Brown and I serve as Senior Counsel for the Connecticut Business and Industry Association (CBIA). CBIA represents thousands of businesses throughout the state of Connecticut with the majority having fewer than 25 employees.

CBIA appreciates the intent of this bill (based on the name), to ensure municipalities and the state have appropriate data and planning procedures in place to provide adequate mitigation measures against storms and changes in sea level along the Connecticut shoreline as well as tidal rivers and wetlands.

Within those sections of the bill focused on planning and resiliency, CBIA has a concern as to the purpose and need for changing the effective definition of sea level change for purposes of this bill.

The current definition of “Sea level change” under the Coastal Zone Management Act (CZMA)¹ and the state’s flood management statutes² relies on actual data tabulated by the National Oceanic and Atmospheric Administration (NOAA). However, SB-7 proposes that sea level changes for state and municipal planning purposes, shall now be based on modifications or “updates” to the NOAA data and reports by the University of Connecticut’s (UConn), which under the statute, may only occur every ten years.

The most recent NOAA report on sea level change, published in 2017, uses data collected from tide gauges and satellite laser altimeters from around the world. What value the UConn scenario “updates” add to the NOAA data is unclear. CBIA would appreciate the committee looking into this with a critical eye before making a final decision on SB-7. We are especially interested in the extent to which the UConn modifications would be based on actual data versus computer modeling using subjective assumptions.

As state above, CBIA opposes all sections and provisions within this bill that go beyond planning and resiliency. Several sections of the bill are designed to push future policymakers to put concerns about climate change in a superior priority position relative to other considerations that effect Connecticut’s economy and electric ratepayers.

¹ “Rise in Sea Level” means the arithmetic mean of the most recent equivalent per decade rise in the surface level of the tidal and coastal waters of the state, as documented in National Oceanic and Atmospheric Administration online or printed publications for the agency’s Bridgeport and New London tide gauges.

² See C.G.S. 25-68

The recently released 2018 Comprehensive Energy Strategy is but the latest documentation that the current administration does not weigh concerns of cost, economic competitiveness and reliability on an even par with its quixotic obsession over adopting policies it appears to seriously believe will have an impact on global climate trends.

This hyper-focus at the state level on climate change as the guiding star for energy and environmental policy is already established. The provisions of this bill that would only elevate that priority and attempt to bind future governors and legislators to that perspective is, in our view, misguided and dangerous to our state's hope for broad economic recovery.

Accordingly, CBIA opposes and urges deletion of the following sections of SB-7:

Section 2, which seeks to insert climate change concerns into the state's 3-year Integrated Resource Plan, which already requires deliberation to "minimize the cost of all energy resources to customers over time and maximizes consumer benefits consistent with environmental goals and standards . . ."

Section 3, which seeks to add "climate change" into the title of future Comprehensive Energy Strategies, and require the report to include, "**any** analysis and recommendations **necessary** to guide the state's energy policy to meet greenhouse gas emission reduction **requirements** . . ." (emphasis added).³

Section 4, which has essentially the same effect as Section 1

Section 5, which changes the source of determining sea level change (as noted above) and is otherwise duplicative of the existing language of C.G.S. Section 16a-32a with respect to greenhouse gas emissions.

Section 10: After Connecticut instituting major initiatives in renewable energy, energy efficiency, energy conservation, energy generation air quality requirements, elimination of coal as a baseline generation fuel, and countless other measures that, nevertheless, have roughly amounted to just a 10% reduction in greenhouse gas emissions in Connecticut below 1990 levels over the last 12 years, SB-7 nevertheless seeks to **mandate** that we reduce these emissions by an additional 35% over the next 12 years.

The adoption of the 2050 timeframe was adopted in 2006 for a reason. The 80% reduction requirement represented then, as it does today, a standard that will require the nation, NOT just Connecticut, to fundamentally transform its economy with respect to energy and transportation. It may or may not be too aggressive and require adjustment in the future. But the last thing Connecticut, our citizens, and our economy need right now is DEEP doubling down on highly aggressive carbon reduction goals without

³ Note, in various portions of the bill, our current greenhouse gas reduction standard of 80% below 1990 levels by 2050 are referred to as "requirements" while in other places, it is referred to as a "goal" – even within this section of the bill. The enabling legislation found in CGS section 22a-200a uses the terms "limits" and "goals", but uses the term "shall" with respect to the reduction.

regard to our struggling economy, based on the false premise that with enough pain, Connecticut can actually have an impact on global climate trends.

CBIA has no objection to sections 1,6-9, or 11-30 of this bill other than our previously noted concern and request for clarification regarding changing the reference for assessing sea level change, as well as any proposed changes to the title and purpose of the Comprehensive Energy Strategy, also as noted above.

Thank you for this opportunity to comment on SB-7 and for your consideration of our recommended changes.