EVERSOURCE ENERGY

TESTIMONY OF
VINCENT PACE
ASSOCIATE GENERAL COUNSEL
EVERSOURCE ENERGY
Before the Energy & Technology Committee
March 5, 2019

RE: H.B. No. 7251, AN ACT CONCERNING LONG-TERM CONTRACTS FOR CERTAIN CLASS I GENERATION PROJECTS AND THE RESIDENTIAL SOLAR INVESTMENT PROGRAM AND REQUIRING A STUDY OF THE VALUE OF SOLAR

H.B. No. 7252, AN ACT CONCERNING THE CONSERVATION ADJUSTMENT MECHANISM AND COMMERCIAL AND INDUSTRIAL CUSTOMERS

H.B. No. 7152, AN ACT ACCELERATING THE DEPLOYMENT OF 5G WIRELESS FACILITIES

My name is Vincent Pace and I am Associate General Counsel, for Connecticut State Regulatory matters, for Eversource Energy. I am offering Eversource's testimony on the above-listed bills that have been raised for public hearing.

Eversource transmits and delivers electricity to 1.2 million customers in 149 cities and towns in our State, and provides natural gas to 222,000 customers in 72 communities in Connecticut. Eversource harnesses the commitment of its approximately 8,000 employees across three states to build a single, united company around the mission of delivering reliable energy and natural gas, and superior customer service.

1. H.B. No. 7251, AN ACT CONCERNING LONG-TERM CONTRACTS FOR CERTAIN CLASS I GENERATION PROJECTS AND THE RESIDENTIAL SOLAR INVESTMENT PROGRAM AND REQUIRING A STUDY OF THE VALUE OF SOLAR.

H.B. No. 7251: (1) requires electric distribution companies to solicit and file with the Public Utilities Regulatory Authority ("PURA") long-term contracts with owners or developers of certain Class I generation projects for an additional year; (2) increases the total potential deployment pursuant to the residential solar investment program from 300 to 400 megawatts; and (3) requires the Department of Energy and Environmental Protection ("DEEP") to have the Connecticut Academy of Science and Engineering ("CASE") perform a study of the value of solar for this Committee.

Eversource recommends that—in order to provide CASE with access to comments from a variety of different interested parties—it would be helpful to clarify in Section 3 of this Bill that DEEP or CASE can solicit written comments from interested parties which CASE can evaluate during its preparation of its report.

2. H.B. No. 7252, AN ACT CONCERNING THE CONSERVATION ADJUSTMENT MECHANISM AND COMMERCIAL AND INDUSTRIAL CUSTOMERS.

H.B. 7252 proposes to reduce the amount that large commercial and industrial ("C&I") customers contribute to the Conservation & Load Management ("C&LM") fund, thereby reducing the amount of funds available to pay for conservation and energy efficiency ("EE") programs that benefit residential, small business and C&I customers in our State.

Eversource understands the competitive economic pressures facing Connecticut-based C&I entities, who compete with competitors that operate in other U.S. states and international markets. Although this Bill would relieve C&I customers from a yet-to-be-determined portion of their existing financial support for the C&LM fund, Eversource respectfully asks this Committee to carefully weigh those benefits to C&I customers against the following negative consequences from this Bill:

- The Bill would remove funding from the State's award-winning EE programs.
- For Connecticut homes and businesses, EE is the most cost-effective energy resource available.
    - Connecticut homes and businesses that implement EE measures save money and their businesses are therefore more competitive. The money saved can be reinvested elsewhere in Connecticut's economy.
- EE investments generate Connecticut jobs and in-State economic activity.
- Creating an exception for C&I customers potentially "opens the door" to other groups of electric customers that also face economic pressures who may seek similar reductions or exemptions from this Committee in the future.

3. H.B. No. 7152, AN ACT ACCELERATING THE DEPLOYMENT OF 5G WIRELESS FACILITIES.

Section 1 of H.B. 7152 establishes a Council on 5G Technology to facilitate the study of, and potential deployment of, wireless facilities on real property owned by the State of Connecticut. In doing so, Section 1(g) of the Bill preserves the existing authority of PURA and the Connecticut Siting Council over this subject matter.

Section 2 of the Bill, however, is less clear when it states in relevant part that: "The Office of Policy and Management, in consultation with the Public Utilities Regulatory Authority and the Connecticut Siting Council, shall work with municipalities to establish a process for siting small wireless facilities on municipal property and, with the permission of the property owner, private property ***where the use of utility or light poles is insufficient***." (Emphasis added.) Section 2 applies to the undefined term "municipal property"; and it later refers to "utility or light poles" presumably located on or near municipal roads without clarifying who owns those utility and light poles. In order to avoid ambiguity—and to eliminate objections from non-municipal utility companies that are uncertain whether Section 2 seeks to apply its provisions to non-municipal utility and light poles—Section 2 should be clarified to add the following new sentence: "Section 2 does not apply to the real and personal property of a public service company, as defined in section 16-1, regulated by the Public Utilities Regulatory Authority". PURA has already developed procedures that govern the installation of wireless facilities on utility poles owned by non-municipal public service companies in, among others, PURA Docket Nos. 08-06-19[1] and 17-02-49.[2]

Thank you for your consideration of this testimony.

---

[1] See Docket No. 08-06-19, DPUC Investigation Into The Deployment Of Distributed Antenna System (Das) In The Public Rights Of Way In Connecticut, September 29, 2010 Decision.

[2] See Docket No. 17-02-49, PURA Formalization Of Small Cell Antenna Applicant Processes And Procedures To Construct Facilities In Connecticut's Public Rights-Of-Way, June 2, 2017 Decision (stating "In this Decision, the Authority hereby updates, clarifies and modifies the processes and procedures that should be observed by all wireless service providers seeking approval to construct small cell radio antenna facilities in the public rights-of-way.")