

Biomass-related Comments to draft RPS Study

Stakeholders	Date	Main Topic	Specific Issue	Page Cite
Robert Fromer	4/15/2013	Proposal to change consideration of biomass as a Class I renewable	State should remove sustainable biomass from consideration as RPS energy sources. Reasons include: (1) crippling fossil fuel dependence; (2) deficient Energy Return on Invested Energy at scale; (3) poor quality; (4) huge environmental impact; (5) higher lifecycle GHG emissions; (6) increased global instability; and (7) decreased energy security.	pp. 10-11 + Att. 2
Martha Kelly	4/11/2013	Characterization of biomass as "not very clean" or "not-so-clean"	Ms. Kelly supports tighter biomass rules. Although burning construction debris may be expedient, it is not clean or good for public health. She's a resident of Hartford. Hartford suffers from hosting huge regional incinerators for both sewage sludge incineration and municipal solid waste.	p. 2
Kimberly A. Stoner	4/18/2013	Proposal to change consideration of biomass as a Class I renewable	"Eliminating dirty biomass and landfill gas from counting as Class I Renewables would be a positive step."	p. 1
350CT.org (Ben Martin)	4/18/2013	Proposal to change consideration of biomass as a Class I renewable	"Eliminating dirty biomass and landfill gas from counting as Class I Renewables would be a positive step."	p. 2
American Forest & Paper Association (Peter Brown)	4/11/2013	Proposal to change consideration of biomass as a Class I renewable	AFPA questions indications that biomass should somehow occupy a lesser rank among Class I renewables in CT. AFPA also questions suggestions that biomass be phased out for consideration as a Class I renewable.	p. 2
American Forest & Paper Association (Peter Brown)	4/11/2013	Proposal to change consideration of biomass as a Class I renewable	According to DEEP data, large percentage of Class I supply comes from biomass. Therefore, AF&PA believes that restricting or barring biomass energy production facilities from Class I eligibility will create scarcity in REC market. Simple economics dictate that scarcity will increase price of Class I RECs, which will be directly felt by ratepayers.	p. 2
American Forest & Paper Association (Peter Brown)	4/11/2013	Proposal to change consideration of biomass as a Class I renewable	As substitutes for displacing/foreclosing biomass from CT's RPS market, Draft RPS Study advances strategy to rely on imports of hydroelectric power from Canada or wind power from northern NE. However, there is uncertainty of these sources' availability to CT RPS in the near (5 to 6-yr) term. Therefore, it would seem prudent <u>not</u> to reduce the largest source of Class I power from CT RPS market.	pp. 2-3
American Forest & Paper Association (Jerry Schwartz)	4/19/2013	Proposal for certain biomass facilities to purchase RGGI allowances to offset their truck emissions	AFPA notes that no other renewable resource is required to obtain offsets for transportation of equipment, fuel, maintenance personnel or repair activities.	p. 8
American Forest & Paper Association (Jerry Schwartz)	4/19/2013	Proposal to change consideration of biomass as a Class I renewable	As shown by Draft RPS Study (p. 10) and Appendix II (p. 11), the share of Class I REC market represented by biomass is decreasing dramatically, which demonstrates that concerns of biomass's dominance of CT RPS market are unfounded.	p. 8
American Forest & Paper Association (Jerry Schwartz)	4/19/2013	Proposal to categorize older biomass plants as "legacy" facilities	The Forest Products Industry is not a static, "legacy" industry; it's constantly investing to improve the productivity, energy and environmental performance of its mills.	p. 8
American Forest & Paper Association (Jerry Schwartz)	4/19/2013	Emission standards for biopower air pollutant emissions	While one of the policies of the RPS is to obtain clean air benefits for CT residents, it is not likely that those residents will derive any benefit from additional NOx reductions that could be imposed on out-of-state mills as a result of the RPS Study's recommendations.	p. 10
American Forest & Paper Association (Jerry Schwartz)	4/19/2013	Proposal to change consideration of biomass as a Class I renewable	It appears ill-advised for RPS Study to recommend a "transition" away from currently eligible biomass in Class I at any time over next 12 years. Any exclusion of biomass from Class I eligibility will assure REC values at ACP of \$55/REC for indefinite future.	p. 12
American Forest & Paper Association (Jerry Schwartz)	4/19/2013	Proposal to change consideration of biomass as a Class I renewable	This proposal will result in disqualifying from Class I eligibility a generation technology that is operated as "baseload" and whose production is not dependent on variability of wind or sunshine.	p. 12

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American Forest & Paper Association (Jerry Schwartz)	4/19/2013	Proposal to change consideration of biomass as a Class I renewable	Draft RPS Study recognizes that it is critical to maintain a stable regulatory environment and to minimize perception of political uncertainty to promote investments in renewable energy. However, Study's overall goal to replace biomass with other renewable energy is hardly conducive to stable regulatory environment.	p. 15
Appalachian Mountain Club (Susan Arnold)	4/18/2013	Proposal to categorize older biomass plants as "legacy" and/or "vintage" facilities	When pitting "legacy" biomass generation against imported large hydro, the environmental impacts created by large hydro (e.g., major river diversions, massive flooding, resulting GHG emissions, impact to wildlife, deforestation, stimulation of mercury mobilization) dwarfs those created by biomass generation in NE. It is of concern that some of the same questions the Draft RPS Study poses for the impacts of biomass generation appear not to be asked of the impacts of Canadian large hydro.	pp. 1-2
Berkshire-Litchfield Environment Council (Starling W. Childs)	4/19/2013	Proposal to change consideration of biomass as a Class I renewable	BLEC does not support removing biomass and landfill gas projects from counting towards Class I renewables. These sources, each in their own way, reduce emissions and/or leakage of methane gas into atmosphere (which would otherwise have significant GHG consequences).	pp. 1-2
Biomass Power Association (Robert E. Cleaves IV)	4/11/2013	Proposal to categorize older biomass plants as "legacy" and/or "vintage" facilities	BPA argues that tech around biomass combustion has not changed significantly since biomass came on the energy scene in early 80s. Despite biomass industry's desire for the most modern tech, chances are that if a so-called "old" biomass plant were simply replaced with a "new" facility, the boiler tech would probably not be materially different. So, from a public policy perspective, there is little gain in changing existing policy.	pp. 1-2
Biomass Power Association (Robert E. Cleaves IV)	4/11/2013	Proposal to categorize older biomass plants as "legacy" and/or "vintage" facilities	Where tech has truly changed from 30 years ago is in the air pollution area. CT has led in using RPS for biomass to drive tech, innovation and capital investment, which is what the RPS is supposed to do. State should not abandon this "technology forcing" approach in its RPS in favor of a bright line test based on the age of a boiler.	p. 2
Biomass Power Association (Robert E. Cleaves IV)	4/11/2013	Proposal to categorize older biomass plants as "legacy" and/or "vintage" facilities	This proposal provides no environmental benefit (since it will likely reduce the amount of biomass produced in NE) and it's a fundamental policy shift, which will send a conflicting message to investors about stability of CT market.	p. 2
Biomass Power Association (Robert E. Cleaves IV)	4/11/2013	Proposal for certain biomass facilities to purchase RGGI allowances to offset their truck emissions	BPA asks that State defer decision on this proposal until after EPA has completed rulemaking on biogenic carbon emissions (draft rule is likely to be released this summer, with final rule expected in 2014). While BPA acknowledges that trucks using diesel are certainly not carbon neutral, BPA asks (before requiring RGGI credits) for a more thorough study (which will come with EPA's rulemaking).	p. 2
Burlington Electric Department (John M. Irving)	4/19/2013	Proposal of stricter emissions standards for biomass facilities	The PM emissions from the McNeil wood-fired electric generating station in Vermont are significantly lower than the New Hampshire limits proposed in Draft RPS Study and the levels proposed in SB 1138. Of concern is the proposed language requiring basing compliance on the previous calendar quarter from these emissions. This would either require putting a test crew to climb the chimney during the winter months (which is generally avoided in northern NE for safety reasons), or relying on unproven monitoring equipment in this application.	p. 1
Burlington Electric Department (John M. Irving)	4/19/2013	Proposal to categorize older biomass plants as "legacy" and/or "vintage" facilities	The statement that "their initial investment cost has already been fully paid" is incorrect relative to the McNeil Station. BED is still paying on the bonds used to pay for the initial construction and upgrades, despite it being the oldest biomass plant in NE.	p. 2

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Connecticut Fund for the Environment (Mark LeBel)	4/19/2013	Proposal to change consideration of biomass as a Class I renewable	CFE would not support any changes to Class I RPS that reduce the present or future environmental benefits of the current law. However, there are 3 ways to reform Class I RPS in a manner that cuts costs to CT consumers while preserving the important environmental benefits: (1) energy efficiency investment; (2) long-term contracting for renewable resources; and (3) cutting off or reducing payments to environmentally undesirable resources that currently receive payments as Class I resources (including generation facilities that are already counted towards another state's environmental goals, landfill gas, and substandard biomass facilities).	p. 2
The Connecticut Light and Power Company (CL&P) (Christopher R. Bernard)	4/4/2013	Proposal to change consideration of biomass as a Class I renewable	Given this proposal, and that the majority of biomass facilities are generally older, fewer biomass resources will qualify as Class I renewable resources. This will further exacerbate the Class I resource shortfall and, thus, increase potential ACP payments by ratepayers.	p. 2
Connecticut Thermal REC Coalition	4/19/2013	Thermal Renewable Energy Credits (T-RECs)	CT-REC recommends that RPS Study include CT-based renewable capacity that creates jobs, supports economic growth and meets the State's environmental goals. The following technologies are all recognized for their environmental benefits in lowering GHG emissions by reducing the use of fossil fuels: (1) no-electric thermal energy resources such as biomass-based heating and cooling utilizing wood pellets or chips; (2) biodiesel blended with heating oil (bioheat); (3) biogas from anaerobic digesters and landfill gas capture projects; (4) solar water-heating; and (5) geothermal heating and cooling. CT is in a unique position to incorporate T-RECs from the applications as Class I resources.	p. 1
Covanta Energy Corporation (Michael J. Cicchetti)	4/19/2013	Inclusion of Energy-from-Waste as a Class I energy source	Covanta believes this will help meet RPS goals, specifically increasing in-state Class I renewable generation. EfW facilities produce renewable energy near the areas of demand (avoiding significant new transmission line costs), increase economic activity and support high paying CT jobs. EfW requires less financial support than intermittent renewables and it is baseload power; thus it could help stabilize or even reduce energy prices. EfW is recognized internationally by climate scientists as a reducer of GHG emissions.	p. 1
Covanta Energy Corporation (Michael J. Cicchetti)	4/19/2013	Inclusion of Energy-from-Waste as a Class I energy source	The policy promoted by RPS is in direct contradiction to CT's own solid waste policy. Covanta notes that the Governor's Working Group on Modernizing recently reaffirmed CT's adoption of the solid waste hierarchy, which was adopted decades ago and has been key to CT's success in this area. This hierarchy encourages source reduction and recycling and is explicit in its preference of EfW over landfills.	pp. 1-2
Covanta Energy Corporation (Michael J. Cicchetti)	4/19/2013	Inclusion of Energy-from-Waste as a Class I energy source	EfW facilities produce 9 to 14 times the energy per ton compared to landfill gas.	p. 3
GDF SUEZ Energy North America (Charles Burnham)	4/19/2013	Proposal to change consideration of biomass as a Class I renewable	GDF SUEZ disagrees with proposed path to "phase-out" what are deemed "legacy" biomass facilities as Class I resources. This path appears to be based upon a few premises which were inaccurately presented in the Study.	p. 1
GDF SUEZ Energy North America (Charles Burnham)	4/19/2013	Characterization of biomass as "not very clean" or "not-so-clean" // Proposal to categorize older biomass plants as "legacy" and/or "vintage" facilities	GDF SUEZ's biomass facilities have not remained stagnant, simply operating and collecting Class I REC dollars. Rather, GDF SUEZ has and continues to make various improvements with the newest technologies to meet stricter emissions standards and RPS targets, which is really one of the major goals of any RPS.	p. 2

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GDF SUEZ Energy North America (Charles Burnham)	4/19/2013	Proposal of stricter emissions standards for biomass facilities	If stricter emissions standards for biomass are part of legislation resulting from RPS Study, GDF SUEZ request that the standards be reasonably achievable with current technology and that any such legislation should carefully follow fundamental principles laid out in Section 2.2 of Appendix II.	p. 3
Green Power Solutions, Inc. (William Rees)	4/18/2013	Proposed inclusion of anaerobic digesters under Class I sources	GPS supports recommendation that Class I resource definition be modified to allow all methane/biogas that is biologically derived and produced by new technologies such as anaerobic digesters to qualify as a Class I source. Anaerobic digester technology meets all of CT's RPS policy goals.	p. 1
Green Power Solutions, Inc. (William Rees)	4/18/2013	Proposed inclusion of anaerobic digesters under Class I sources	Anaerobic digestion technology promises farmers a means to mitigate their utility costs and improve efficiency, as well as recycle nutrients, reduce or eliminate pathogens and emissions, and control odors for the surrounding community. It is a solution for several issues facing CT farmers as they struggle to keep competitive with the larger Midwest operations, while remaining good neighbors in the face of an encroaching urban sprawl.	p. 1 & 2
Maine Department of Environmental Protection (Commissioner Patricia W. Aho)	4/19/2013	Proposal to change consideration of biomass as a Class I renewable	<i>(Note: Comm. Aho specifically refers to SB 1138 in her comments)</i> SB 1138 unfortunately increases barriers to biomass, which undermine Maine's regional effort to grow a renewable energy sector. Specifically, the biomass sector in Maine and NE has invested to meet standards for CT's RPS and "this modification puts these investments at risk."	p. 1
Maine Department of Environmental Protection (Commissioner Patricia W. Aho)	4/19/2013	Proposal for certain biomass facilities to purchase RGGI allowances to offset their truck emissions	<i>(Note: Comm. Aho refers to SB 1138 in her comments)</i> This raises significant methodological questions and challenges. Fundamentally, "we believe that these standards have broad regional implications and thus should be considered through discussions at the regional level rather than on a state by state level. As written we are concerned that our renewable energy definitions will increase complexity, compliance costs, and undermine the effort to create a homogenous and robust renewable energy market in New England."	p. 1
Maine Forest Products Council (Patrick Strauch)	4/18/2013	Proposal to categorize older biomass plants as "legacy" and/or "vintage" facilities	MFPC is concerned about proposal to phase out biomass energy simply by the age of the facility, without respect to its environmental performance and investments in cutting-edge technology. MFPC urges CT to continue its leadership in utilizing a "technology forcing" approach in its RPS.	pp. 1-2
Maine Forest Products Council (Patrick Strauch)	4/18/2013	Characterization of biomass as "not very clean" or "not-so-clean"	Even though CT's RPS program has some of the strictest emissions standards in U.S., biomass facilities are meeting those standards with the benefit of state-of-the-art pollution control technology. Maine's forests have one of highest percentages of sustainably certified forestland in U.S. A lifecycle analysis of wood clearly demonstrates a positive carbon sequestration affect of a managed forest, especially when the substitution benefits of wood are recognized.	p. 2
Maine Forest Products Council (Patrick Strauch)	4/18/2013	Proposal to change consideration of biomass as a Class I renewable	Although Draft RPS Study states that 76% of CT's RPS compliance in 2010 came from biomass resources, the percentage contribution of biomass dropped to 37% in 2012 (see Appendix II of Draft RPS Study). Therefore, any concern about a disproportionate fraction of biomass participation is already being addressed through market forces without any need to impose new restrictions.	p. 2
Maine Forest Products Council (Patrick Strauch)	4/18/2013	Proposal for certain biomass facilities to purchase RGGI allowances to offset their truck emissions	MFPC reports that Maine has a sophisticated transportation network with over 25K miles of private roads, which allow unrestricted transportation weights and significant efficiencies. Additionally, the opportunities for wood deliveries in a variety of mill locations further increases hauling efficiencies.	p. 2

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Maine Forest Products Council (Patrick Strauch)	4/18/2013	Proposal for certain biomass facilities to purchase RGGI allowances to offset their truck emissions	CT should defer any decision on this proposal until after EPA has completed its rulemaking on biogenic carbon emissions.	p. 2
New England Hydropower Company, LLC	4/19/2013	Proposal to change consideration of biomass as a Class I renewable	SB 1138 (which is intended to implement recommendations of Draft RPS Study), as drafted, does not propose a methodology to facilitate positive economic signals to new, innovative, in-state technologies. Instead, reliance falls on replacing out-of-state biomass facilities and landfill gas plants with out-of-state, conventional, large hydropower facilities.	p. 2
New Haven/Leon Sister City Project and New Haven Environmental Justice Network (Chris Schweitzer)	4/19/2013	Proposal to change consideration of biomass as a Class I renewable	"Eliminating dirty biomass and landfill gas from counting as Class I Renewables would be a positive step."	p. 1
Office of Consumer Counsel (Joseph A. Rosenthal)	4/19/2013	Proposal to change consideration of biomass as a Class I renewable	Draft RPS Study demonstrates that old, out-of-state biomass facilities are receiving a large and mostly needless windfall of support from CT ratepayers through high CT Class I REC prices. It is OCC's understanding that these facilities have been operating despite the volatility in Class I pricing, which tends to show that even if they need REC revenue to remain operational, they do not need anything like the recent 5.2 cents per kWh price.	p. 2
Office of Consumer Counsel (Joseph A. Rosenthal)	4/19/2013	Proposal to change consideration of biomass as a Class I renewable	OCC agrees that a transition from reliance on old, out-of-state biomass resources should occur. OCC also agrees with the caveat that any such phase-out must be carefully timed so that replacements will be ready at a reasonable cost. The massive outflow of CT funds to out-of-state plants that are not particularly clean and predate the RPS should not continue for long.	p. 3
Office of Consumer Counsel (Joseph A. Rosenthal)	4/19/2013	Proposal to change consideration of biomass as a Class I renewable	To provide immediate ratepayer relief, OCC suggests that biomass plants whose operation predates a certain date (such as 1/1/2000), and who do not meet certain emissions limits, could have their own "Class I-B." The electric suppliers could meet a portion of their Class I RPS requirements with Class I-B RECs (or with Class I RECs), which amount of Class I-B RECs could be designed to decline over time. The ACP for the portion of Class I requirement that may be filled with Class I-B RECs could be set to a figure much lower than the current 5.5 cents per kWh.	p. 3
Plum Creek Timber Company	4/19/2013	Characterization of biomass as "not very clean" or "not-so-clean"	Draft RPS Study makes reference to biomass power as "not-so-clean" without qualifying or substantiating the assertion.	p. 1
Plum Creek Timber Company	4/19/2013	Proposal to categorize older biomass plants as "legacy" and/or "vintage" facilities	The legacy biomass power fleet of NE cannot be considered BAU in context of an evaluation of additionality. As emissions standards change, these plants have invested additional capital to remain in business. Whitepaper #1 appropriately references the importance of "RPS Best Practices" intended to protect investor confidence that policy consistency and fairness will reduce the risk of investing to achieve public policy goals. The initial investment of CT RPS observed these best practices by accepting legacy biomass plants established by earlier policy. The phase-out of these plants runs counter to RPS best practices.	pp. 1-2
Plum Creek Timber Company	4/19/2013	Proposal to categorize older biomass plants as "legacy" and/or "vintage" facilities	PCTC thinks it's odd that RPS Study would express concern about importing biomass power from neighboring states within NE economy, embracing the importing of power from another country. PCTC does not oppose a CT strategy to increase its renewable energy base, but PCTC opposes the creation of new barriers to existing and potential bioenergy opportunities.	p. 2

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Plum Creek Timber Company	4/19/2013	Proposal to change consideration of biomass as a Class I renewable	The phasing out of legacy biomass plants reduces the renewable energy supply base for CT electric consumers. Reducing supply will place upward pressure on price of renewable power and RECs.	p. 2
ReEnergy Holdings LLC (Larry Richardson)	4/19/2013	Proposal to change consideration of biomass as a Class I renewable	The proposed strategy to "phase out" or "transition away" from biomass ignores those who have made very significant recent investments in response to current policy, creates market instability and may have a very negative impact on CT ratepayers.	p. 1
ReEnergy Holdings LLC (Larry Richardson)	4/19/2013	Proposal to categorize older biomass plants as "legacy" and/or "vintage" facilities	The use of terms such as "legacy" and "vintage" are misleading since, for instance, ReEnergy has invested many millions in its biomass-to-energy facilities, using advance technologies to meet CT standards.	p.1
ReEnergy Holdings LLC (Larry Richardson)	4/19/2013	Proposal to change consideration of biomass as a Class I renewable	Draft RPS Study neglects to mention the significant reduction of CT Class I RPS compliance from 76% in 2010 to 37% in 2012. Any perceived "problem" of a disproportionate fraction of biomass participation is already working itself out through market forces without any need to impose new restrictions.	pp. 1-2
ReEnergy Holdings LLC (Larry Richardson)	4/19/2013	Proposal to change consideration of biomass as a Class I renewable	Any consideration of refinements to Class I program compels need to consider private-sector investments that have been made in reliance on CT's existing Class I program. Specifically, Table 7 of Appendix II omits significant recent investments, including the major investment that ReEnergy made in the Sterling facility in 2011. (for express purpose of enabling that tire-burning facility to participate in Class I program by c-firing biomass with tires).	p. 2
ReEnergy Holdings LLC (Larry Richardson)	4/19/2013	Employment impacts of biomass-to-energy facilities and the use of recycled wood	RPS Study should include an analysis of the positive employment impact within CT related to continuing the eligibility of biomass-to-energy facilities and the use of recycled wood for eligible biomass facilities, which enhances the viability of in-state construction and demolition material (C&D) processing facilities.	p. 2
ReEnergy Holdings LLC (Larry Richardson)	4/19/2013	Proposal for certain biomass facilities to purchase RGGI allowances to offset their truck emissions	ReEnergy believes this potential requirement lacks a scientific basis and could have negative unforeseen consequences. CT should defer any decision until after EPA has completed its rulemaking on biogenic carbon emissions from biomass-to-energy facilities.	p. 3
Renewable Energy and Efficiency Business Association, Inc. (REEBA)	4/19/2013	Proposal to change consideration of biomass as a Class I renewable	The proposal to "phase out" or "transition away" from biomass is unfair to biomass companies that have made very significant recent investments in response to current policy, and creates market instability.	p. 2
Renewable Energy and Efficiency Business Association, Inc. (REEBA)	4/19/2013	Proposal to change consideration of biomass as a Class I renewable	If these facilities cease operation, CT's solid waste will have to be trucked hundreds of miles to out-of-state disposal facilities.	p. 2
Renewable Energy and Efficiency Business Association, Inc. (REEBA)	4/19/2013	Characterization of biomass as "not very clean" or "not-so-clean"	Biomass companies have invested millions of dollars in its facilities, using cutting-edge technology to meet CT's strict emissions standards under RPS. These companies are prepared to meet even stricter standards.	p. 2
Renewable Energy and Efficiency Business Association, Inc. (REEBA)	4/19/2013	Proposal to categorize older biomass plants as "legacy" and/or "vintage" facilities	Draft RPS Study inaccurately describes "vintage" biomass facilities as being fully depreciated.	p. 2
Rivers Alliance of Connecticut (Margaret Miner)	4/19/2013	Proposal to change consideration of biomass as a Class I renewable	CT should stop subsidizing non-clean, out-of-state biomass plants. CT should also re-examine its exclusion of many sources of methane production from Class I (but sewage sludge is probably not a proper Class I fuel).	p. 1
TriState Solar Alliance (Don Van Rhyn)	4/18/2013	Proposal to change consideration of biomass as a Class I renewable	"Eliminating dirty biomass and landfill gas from counting as Class I Renewables would be a positive step."	p. 2

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Grace Adams	4/17/2012	Local Generation	Would like CT to stimulate its economy through building local renewable energy infrastructure.	p. 1
Tom Cleveland	4/18/2013	Environmental Concerns/Environmental Justice	Hydropower from Canada means power from Hydro Quebec. Cites concerns about environmental and indigenous rights, and damage that its production causes.	p. 1
Peter Ellner	4/11/2013	Contracted Tier	There is no evidence, or analysis, that purchasing large-scale hydro from Canada will create new and additional hydro.	p. 1
Katherine Freygang	4/10/2013	Local Generation	Large Canadian hydro weakens standards recommends a focus on in-state development of renewables and programs such ZREC an LREC programs.	p. 1
Robert Frommer	4/15/2013	Class I Tier	It is feasible and desirable to increase the RPS to include hydropower, but it may not be worthwhile. The benefits from Classes I, II and III are quite low considering the investment of energy needed for such sources. See Figure 2 of his comments.	p. 9
Robert Frommer	4/15/2013	Class I Tier	The energy return on investment for hydro is quite low, transmission losses would be higher by virtue of distance from the source to CT, security risks are increased from saboteurs and solar eruptions, and energy assurance is decreased.	p. 10
Robert Frommer	4/15/2013	Class I Tier	Addition of large-scale hydro would negligently impact the New England Power Pool System Mix while significantly increasing the percentage of Class I power from renewables sources above that required. Hydro need not replace CT renewables, and should serve as surplus capacity when needed.	p. 10
Patrice Gillespie	4/19/2013	Class I Tier	CT should not include Canadian hydro as part of the RPS. The RPS should be used to promote CT jobs and economic development, should be from environmentally-friendly sources (of which large hydro is not).	p. 1
Patrice Gillespie	4/19/2013	Environmental Concerns/Transmission	Opposes new Canadian hydro for its destruction of lands through flooding. Does not want to see transmission lines like the Northern Pass destroying the White Mountains National Forest when the state could turn to more cleaner and more local energy sources.	p. 1
Evan S. Griswold	4/18/2013	Environmental Concerns	Hydropower has environmental consequences. Even attempts at mitigation of these consequences, such as fish ladders and elevators, have done little to stem the tide of decline in the overall ecological health of our rivers.	p. 1
Evan S. Griswold	4/18/2013	Local Generation	Weakening CT's RPS by allowing the purchase of electricity from large hydro in Canada does nothing to encourage the State's renewable energy efforts and, by making electricity cheaper, encourages the delay in our citizens' efforts to conserve and search for home-grown alternatives.	p. 1
Ahna Johnson	4/19/2013	Class I Tier	Classifying large hydropower from Canada as Class I renewable weakens the original intent of the RPS, which is meant to encourage the growth of our state's renewable energy sector. Hydro is a mature technology that does not need this kind of support - especially when it would send CT ratepayer dollars out of the country. In addition, large hydro can affect rivers and land use in ways that increase its overall environmental impact.	p. 1
Mary T. Keane	4/10/2013	Environmental Concerns	Please fight the introduction of Canadian hydro that would affect our beautiful rivers and streams.	p. 1
Martha Kelly	4/11/2013	Environmental Concerns/Environmental Justice	Urge DEEP not to dilute the RPS with large-scale hydro from Quebec. That is a mature industry that does not need encouragement. Also its record of dealings with the rights and interests of indigenous peoples makes her oppose it on moral and environmental justice grounds as well. The impact on rivers and wildlife is not altogether benign.	p. 1
Martha Kelly	4/11/2013	Local Generation	Recommends focus on local resilience and a reasonable transfer to a post petroleum future. To achieve this we need to build local capacity of Class I power generation, not give those resources to Canada and transmission operators.	p. 1

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Dr. Mitch Kennedy	4/16/2013	Class I Tier	The inclusion of large-scale hydro in Class I will dilute the incentive to use solar PV installations in-state, among other technologies which can grow the State's green economy.	p. 1
Dr. Mitch Kennedy	4/16/2013	Transmission	To get large-scale hydro, transmission from Canada will have to be run, and the power infrastructure upgraded, this will lead to an increase in electricity costs to ratepayers. This is also a strong disincentive to relocate business and manufacturing to CT.	p. 1
Shirley McCarthy	4/18/2013	Class I Tier	Opposes weakening the RPS via classifying large hydro from Canada as a Class I renewable. Incentives for CT and New England wind and solar should not be decreased since local and regional sources have the least environmental impact and are good for the economy.	p. 1
Gian Morresi	3/28/2013	Local Generation	Recommends providing reasonable certainty that the RPS will not dilute any incentives for more local renewable energy investments.	p. 1
Benjamin Page	4/19/2013	Class I Tier	Urge DEEP to reject Canadian hydropower, RPS is for solar and wind sources from CT.	p. 1
James Root	4/19/2013	Class I Tier	Does not think that CT should include Canadian hydro in the RPS. Changing or weakening the law for its inclusion is short sighted in the context of CT's high-tech future. The mantra of higher electric bills is not justification for rushing this process.	p. 1
Kimberly A. Stoner	4/18/2013	Environmental Concerns/Environmental Justice	Hydroelectric power from Canada is very damaging to the environment and to the lands of the native peoples in northern Canada. It is essential that CT build up our own local economies and environmentally friendly sources of power.	p. 1
Kimberly A. Stoner	4/18/2013	Class I Tier	Classifying large hydro from Canada as Class I weakens the original intent of the RPS, to encourage growth of the state's renewable energy sector. It would also divert investments from the job-creating renewable energy projects in CT to projects outside the country.	p. 1
Ellen Williams	4/19/2013	Local Generation	Regionally-produced clean energy is the best choice for CT climate and economy, should not be large-scale hydropower.	p. 1
350CT.org (Ben Martin)	4/17/2013	Class I Tier	Classifying large hydro from Canada as Class I weakens the original intent of the RPS, to encourage growth of the state's renewable energy sector. It would also divert investments from the job-creating renewable energy projects in CT to projects outside the state and country. Hydro is a mature technology that does not need support from the RPS, and inclusion would dilute the program.	p. 1
350CT.org (Ben Martin)	4/17/2013	Environmental Concerns	Large hydro can affect rivers and land use in ways that increase its overall environmental impact.	p. 1
American Forest & Paper Association (Peter Brown)	4/11/2013	Transmission	Large-scale hydro from Canada will require large transmission investments coming into New England. Some of these proposed investments are controversial and subject to vocal and persistent opposition. None have received siting approval from the states in which these lines will be located. There is uncertainty as to the availability of sources of Canadian hydro being available to the CT RPS market in the near (5-6 yr.) term.	p. 2
American Forest & Paper Association (Jerry Schwartz)	4/19/2013	Class I Tier	There is one assumption worth discussing. On page 23 the Draft Study states that 100MWs of large scale hydro 'could be flowed over existing transmission lines,' presumably into southern New England. There is no description or analysis of how this arrangement would occur. It is not clear that such transmission capacity exists.	p. 14
American Forest & Paper Association (Jerry Schwartz)	4/19/2013	Local Generation	If the Draft Study's recommendations are adopted there would be more out of state and out of country RECs used for compliance than there currently are now.	p. 15

Hydro-related Comments to draft RPS Study

Stakeholders	Date	Main Topic	Specific Issue	Page Cite
Appalachian Mountain Club (Susan Arnold)	4/18/2013	Environmental Concerns	The draft compares 'legacy' biomass generation to imported big hydro, favors big hydro. Impacts of biomass generation appear similar to the impacts of Canadian hydro but not considered e.g. major river diversions and massive flooding, and the GHG emissions, impacts to organic soils, mercury mobilization. These impacts dwarf those created by biomass generation in New England.	p. 2
Appalachian Mountain Club (Susan Arnold)	4/18/2013	LIHI	Rather than giving Canadian hydro a free pass, more appropriate would be to require certification by the LIHI for RPS eligibility of hydro in CT's RPS portfolio. LIHI certification is based on 8 criteria, not project size, and can and has certified large hydro.	p. 2
Appalachian Mountain Club (Susan Arnold)	4/18/2013	Transmission	AMC is an active intervener in the Presidential Permitting process for the Northern Pass transmission route.	p. 2
Appalachian Mountain Club (Susan Arnold)	4/18/2013	Environmental Concerns	The impacts of generating 1200 MW of Hydro Quebec power would require a reservoir flooding of approximately 290 square miles, the equivalent to 5% of CT or 36 times the size of CT's largest lake, Candlewood lake. It is extremely doubtful that flooding and diverting the CT River in CT at this scale would ever pass regulatory or public approval in Connecticut.	p. 2
Appalachian Mountain Club (Susan Arnold)	4/18/2013	Transmission	It is specious to make a distinction between which electrons will flow over which transmission lines: increases demand for large hydro in the Northeast, will require new generation projects and new transmission lines in Quebec and elsewhere in the Maritimes.	p. 2
Appalachian Mountain Club (Susan Arnold)	4/18/2013	Local Generation	"Connecticut benefits the most, in terms of employment and economic development, from development of in-state resources." (Pg. 16, draft RPS). Opening up the RPS to large Canadian hydro will slow the development of renewable energy sources both within CT and the New England region as a whole, dampening this critical emerging economic sector and setting back the region's capacity to develop and produce new sources of clean, locally-generated power. Importing large hydro would undermine the fundamental purpose for which the RPS was established.	p. 3
Berkshire-Litchfield Environment Council (Starling W. Childs)	4/19/2013	Class I Tier	Commented that the Draft dilutes CT's RPS by moving the timelines and intent of the RPS to include distant sources of hydro from Canada. This is inconsistent with the original intent of the RPS Class I which was meant to help foster more local and economically responsible means of renewable energy.	p. 1
Berkshire-Litchfield Environment Council (Starling W. Childs)	4/19/2013	Environmental Concerns/Environmental Justice	Environmental impacts and cultural disruptions to native peoples' right livelihoods from previous Hydro Quebec projects in northern Canada not considered.	p. 1
Brookfield Renewable Energy Group (Jon Norman)	4/19/2013	Contracted Tier	The State should recognize existing smaller-scale resources that need support to maintain viable operations and continue their contributions to the Connecticut RPS, through the creation of Maintenance Tier as part of the Class I Contracting Tier. The study did not consider the importance of maintaining the contributions of existing resources to the RPS, and the potential for those resources to substantially reduce the compliance costs in the RPS program, particularly in specific cases where those resources are in need of support. BREG believes that the State's objectives could be better met by selectively qualifying existing (pre-2003) smaller scale resources within the region and vicinity, notably low impact hydropower. On this note, we support the study's recognition of low-impact certification as a useful indicator of environmental contributions for the purpose of the RPS program.	p. 3

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Stakeholders	Date	Main Topic	Specific Issue	Page Cite
Brookfield Renewable Energy Group (Jon Norman)	4/19/2013	Local Generation	There are roughly 300 MW of low impact hydropower in New England that are proven operations and that have reliably operated for decades. This represents real jobs, provide green energy to the grid every day in a manner that is typically more environmentally benign than larger uncertified hydro. These smaller-scale facilities everywhere they operate rely on stable and fair market revenue, of which RPS support should be an important part. Present market conditions and the lack of meaningful RPS support make it challenging to reliably reinvest in and maintain operation of these resources. Suggests establishment of a maintenance tier as part of the Class IA Tier, which would focus on these smaller-scale low impact resources built before 2003 with unique operating characteristics. A maintenance tier would provide supply to the RPS that is at least as cost-effective as (and likely more cost-effective) than the alternatives being proposed in the study, including the contracting tier.	
Brookfield Renewable Energy Group (Jon Norman)	4/19/2013	Tracking	Should remove geographic restrictions on imports while assuring their delivery and tagging to the unit of origin. This so-called "unit tagging" of imported resources is critical to ensure that the energy being delivered is actually tracked to the unit that meets the RPS requirements. Unit tagging is particularly important for the currently proposed Contracting Tier. Without it, it is highly probable that a substantial portion of energy being delivered will have actually originated from fossil-fuel generating facilities from such neighboring jurisdictions. This would clearly undermine the environmental objectives of the RPS.	p. 5
Capital Power Corporation (Michelle C. Gardner)	4/19/2013	Local Generation	A major goal of the RPS, attracting businesses to the state to create jobs and a renewable energy economy, will be jeopardized with the influx of large-scale hydro into the market.	p. 3
Capital Power Corporation (Michelle C. Gardner)	4/19/2013	Contracted Tier	Has grave concerns with the proposed Contracted Tier for large-scale hydro and the prospect of using in-state funding to subsidize out-of-state resources. This concern is founded upon Figure 10 of the RPS study. The adoption of the large-scale hydro tier, and the predicted collapse of REC prices to well below \$30, will essentially put up a "stop" sign for all in-state investment. This may cause their Bridgeport investment to reconsider generating RECs, and there are more than 100 other in-state resources that may face the same predicament.	p. 3
Capital Power Corporation (Michelle C. Gardner)	4/19/2013	Tracking	There are a lack of tracking mechanisms for Canadian hydro.	p. 3
Capital Power Corporation (Michelle C. Gardner)	4/19/2013	Transmission	There are many transmission costs and uncertainties that need to be addressed. For example, the cost of transmission upgrades to that would deliver large-scale hydro to market will be an additional expense borne by the ratepayers; a cost that is not adequately addressed in the RPS study. Further, there is considerable uncertainty regarding the permitting, siting, and construction of new transmission infrastructure in New England, in particular, the proposed Northern Pass route. It is unclear whether adequate transmission capacity will be in place to bring large-scale hydro resources to market, and certainly not by the proposed 2014 start date for the <u>Contracted Tier</u> .	p. 4
Clean Energy Finance and Investment Authority (CEFIA) (Bryan T. Garcia)	4/19/2013	Small Hydro	Support the expansion of the hydro eligibility (small hydro) definition.	p. 7

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Stakeholders	Date	Main Topic	Specific Issue	Page Cite
Clean Energy Finance and Investment Authority (CEFIA) (Bryan T. Garcia)	4/19/2013	Small Hydro	Small hydro remains a relatively untapped source of local renewable energy. CEFIA encourages DEEP and the legislature to support local initiatives that streamline local, state, and federal permitting requirements and processes and to consider development of appropriate processes that would enable site access and development of publically owned dams by private small-hydro developers. Such initiatives would help to expand CT's locally generated renewable energy options as well as provide potential revenue sources for DEEP and the State through lease or off-take agreements.	p. 8
ClearEdge Power (Katrina Fritz)	4/19/2013	Class I Tier	By expanding the Class I definition to include any type of hydropower resources beyond ROR technologies, the State could be exposing the CT Class I market to potentially lower renewable energy credit prices and a likely decrease in the installation and use of Class I in the State.	p. 2
ClearEdge Power (Katrina Fritz)	4/19/2013	Class I Tier	Contracting for large quantities of hydro hundreds of miles away from CT sends the opposite message of the microgrid program, the goal of which is to localize the State and increase local grid resiliency.	p. 2
Connecticut AFL-CIO (John W. Olsen, Lori J. Pelletier)	4/17/2013	Local Generation	Classifying Canadian hydro power as a Class I renewable energy source to reach clean energy goals crowds out the potential Class I renewable energy programs and projects that directly impact local investments and jobs. Believe that all renewable energy proposals should seek to develop, generate, and create jobs for CT. Believe these renewable energy jobs to be inclusive but not limited to the development of renewable energy technology, manufacturing of components and construction of infrastructure here in CT in order to reach renewable energy goals.	p. 1
Connecticut Fund for the Environment (Mark LeBel)	4/19/2013	Contracted Tier	There are several issues with the quantitative analysis of compliance costs and how these costs could be reduced by replacements with contracts with Canadian hydroelectric facilities. 1)Costs in the reference case are likely inflated because the projections for energy demanded do not include the ramp-up in energy efficient programs. 2)Costs shown for a 'NESCOE Procurement' of long-term contracts for current renewables in Table 6 is an overstatement. In an SEA presentation they are labeled 'worst-case scenario.' 3)Assumption that contracts for generation from Canadian hydro are 'at no premium to market' seriously obscures major issues in any such purchase.	p. 2
Connecticut Fund for the Environment (Mark LeBel)	4/19/2013	Environmental Concerns	Hydro has no direct emissions from generation but changes in the water flow of rivers and the flooding of land have major environmental consequences, including the generation of GHGs. If hydro is displacing coal generation, then there are likely environmental benefits, however if it is displacing wind generation, this is not the case.	p. 3
Connecticut Fund for the Environment (Mark LeBel)	4/19/2013	Transmission	There are serious questions about additionality and transmission capacity from Canadian hydro.	p. 3
Connecticut Fund for the Environment (Mark LeBel)	4/19/2013	Environmental Concerns	It should be relatively easy to obtain rough estimates of the GHG Emissions from biomass and hydroelectric facilities.	p. 4
Connecticut Industrial Energy Consumers (James S. King)	4/19/2013	Contracted Tier	The Draft RPS Study fails to address several significant issues created by proposed purchases of large-scale Canadian hydro.	p. 3

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Stakeholders	Date	Main Topic	Specific Issue	Page Cite
Connecticut Industrial Energy Consumers (James S. King)	4/19/2013	Transmission	The Draft RPS Study does not fully examine potential transmission costs associated with Large-scale hydro from Canada. 1) Transmission charges could be incurred in order to transmit large-scale hydro from Canada to CT, which would be passed to CT ratepayers. At the technical conference, DEEP indicated that any transmission charges would be included in the total cost under any PPA and DEEP would only pursue the PPA if the cost was competitive with other Class I resources. DEEP further noted that power purchased from Canada under a long-term PPA need not be delivered to CT, which may avoid certain congestion charges. The Draft RPS Study does not reflect these positions, and should be revised to fully address and analyze how such transmission-related charges will be accounted for under the "contracted tier" option. 2) New transmission infrastructure will likely be needed to transmit large-scale hydro from Canada. The Draft RPS Study assumes existing transmission facilities are adequate, but may require future upgrades. A preliminary cost estimate for new transmission facilities should be included in the RPS Study.	p. 4
Connecticut Industrial Energy Consumers (James S. King)	4/19/2013	Contracted Tier	Recent evidence suggests large-scale hydro from Canada may not create cost-savings. The only available evidence on long-term PPAs with Hydro Quebec indicates that such contracts may inflate the cost of CT's RPS program. The Draft does not address the existing GMP-Hydro Quebec PPA, and instead fully endorses the 'contract tier' as an opportunity to save money on low-cost hydro. From an economic development perspective, it is counter-productive to unduly burden large employers. Further analysis on this issue is needed.	p. 5
Connecticut Industrial Energy Consumers (James S. King)	4/19/2013	Tracking	The Draft RPS Study does not properly address the tracking mechanisms needed to verify the source of Canadian hydro.	p. 5
The Connecticut Light and Power Company (CL&P) (Christopher R. Bernard)	4/4/2013	Contracted Tier	DEEP forecasts that utilization of a Class I 'contracted tier' will save CT ratepayers as much as \$18 million per year in 2022. CL&P estimates this to be a savings for an average residential customer of \$38 per year. They support the inclusion of large-scale hydro as a Class I 'contracted tier' renewable resource.	p. 1
The Connecticut Light and Power Company (CL&P) (Christopher R. Bernard)	4/4/2013	Contracted Tier	See hydro as a supplement to, and not a replacement for, conventional Class I resources, such as wind and solar. Large hydro does not need a financial subsidy to compete with other renewables, and the Draft does not provide one. Large hydro has the potential to be a resources to assist CT in meeting its renewable energy goals, while at the same time reducing the ACP burden that customers would have to bear.	p. 2
The Connecticut Light and Power Company (CL&P) (Joaquina Borges King)	4/19/2013	Class I Tier	CL&P supports the Draft proposal to create a process that would include large hydro in addition to qualified Class I resources which would be eligible for long term contracts with the electric distribution companies. However, the Draft does not outline important details regarding the procurement process. Such details should be included in the Study. Specifically, CL&P believes it is important that the Draft provide further details regarding the EDC role in the procurement process.	p. 1
Connecticut River Watershed Council (Jacqueline Talbot)	4/18/2013	Class I Tier	In opposition to the proposed CT RPS rules of what qualifies as Class I hydro. They support hydro as a renewable resource, if it is done right, with standards that protect the integrity of the water resources from which it draws.	p. 1

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Stakeholders	Date	Main Topic	Specific Issue	Page Cite
Connecticut River Watershed Council (Jacqueline Talbot)	4/18/2013	Class I Tier	The Council is troubled by the RPS study as drafted because it does not sufficiently define the type of hydro facility that warrants the significant financial benefits of Class I designation. Hydro provides clean, carbon-free energy, but it also can have substantial impacts on river health by blocking fish passage, dewatering areas where fish and other critters raise their young, and degrading habitat along riverbanks by allowing water to fluctuate up and down.	p. 1
Connecticut River Watershed Council (Jacqueline Talbot)	4/18/2013	Other	Run-of-river (ROR) operation needs to be included in the CT RPS rules of qualifying Class I hydro, and it must be defined so that it is accurately described as a constant flow of water through a facility. Some dams claim to be Ror, but actually allow for up to 5-foot fluctuations in water level over a 24 hour period.	p. 1
Connecticut River Watershed Council (Jacqueline Talbot)	4/18/2013	Environmental Concerns	There must be ecologically relevant flow releases from facilities such that by-pass reaches not otherwise receiving Ror flows are guaranteed to have sufficient water to function as habitat as determined by state fisheries biologists.	p. 2
Connecticut River Watershed Council (Jacqueline Talbot)	4/18/2013	Environmental Concerns	Up/Downstream passage for all migrating species must be present and functional. Species such as shad, river herring, or eels need to be allowed to move up and downstream from those dams that are determined by fisheries biologists to block passage.	p. 2
Connecticut River Watershed Council (Jacqueline Talbot)	4/18/2013	Environmental Concerns	All facilities must be in compliance with their FERC licenses and state water quality certificates issued under Section 401 of the Clean Water Act.	p. 2
Connecticut River Watershed Council (Jacqueline Talbot)	4/18/2013	Class I Tier	Would not contend with the Draft RPS proposal to increase the upper capacity limit of a plant qualifying for Class I from 5MW to 30 MW. At least up until 30 MW, the generating capacity of facilities should not be a criteria for eligibility. A 5 MW facility or a 30 MW facility can do a great deal of harm to river systems if they are not operating according to best practices.	p. 2
Connecticut River Watershed Council (Jacqueline Talbot)	4/18/2013	Class I Tier	Facilities in New England pool should not go venue shopping. A facility that would not be able to obtain certification under the laws of the state which it is located should not be able to obtain certification in another state.	p. 2
Connecticut River Watershed Council (Jacqueline Talbot)	4/18/2013	Class I Tier	Language they would like to see: "Class I renewable energy source Ror hydro facility provided such facility has a generating capacity of not more than [five] thirty MW, does not cause an appreciable change in the river flow, is not based on a new dam identified by the Commissioner as a candidate for removal, meets site-specific state and federal standards for water quality, fish passage and healthy river flows as determined by the Commissioner in consultation with the state and federal agencies having oversight over hydro facilities, and began operation after July 1, 2003, or is incremental new energy up to 30 MW from increased capacity or efficiency at such a facility."	p. 2
Connecticut River Watershed Council (Jacqueline Talbot)	4/18/2013	Environmental Concerns	Cites a Maine hydro facility example of not meeting regulations or accounting for fish passage. River dam sits on is used by endangered Atlantic salmon, and we CT ratepayers pay for it.	p. 2
Connecticut River Watershed Council (Jacqueline Talbot)	4/18/2013	LIHI	LIHI certification is not crucial. If CT RPS has strong standards for what is truly low-impact that are evaluated by state fisheries biologists that is sufficient. The LIHI program is in need of overhaul, sites an example of LIHI rubber stamping a facility in VT that was opposed by all state and federal biologists in the review process.	p. 3

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Stakeholders	Date	Main Topic	Specific Issue	Page Cite
Connecticut Small Power Producers Association (Duncan Broatch)	4/15/2013	LIHI	Recommend that DEEP remove the recommendation to replace ROR with LIHI certification. This certification is unnecessary, it will pose economic hardship on project developers, and it will decrease the efficiency of hydro projects. LIHI does not properly balance all pros and cons and is simply unfair. LIHI is a private entity that purports to be able to qualify so called low impact projects via a litmus test. LIHI is unregulated, they are not necessarily professionals in the respective fields, and their criteria can be arbitrary.	p. 1
Connecticut Small Power Producers Association (Duncan Broatch)	4/15/2013	LIHI	Hydro projects are already subject to more regulation and oversight than any other type of energy technology except nuclear. All hydro projects in the US must obtain a FERC license or exemption, a process that is extremely exhaustive and thorough. LIHI requirement would stop at least one hydro project in CT from moving forward, and probably more.	
Connecticut Small Power Producers Association (Duncan Broatch)	4/15/2013	Class I Tier	Recommend that DEEP increase Class I hydro to 7.5 MW instead of 30 MW. Increasing to 30MW will swamp the market with out of state project, depress the REC price and stifle new in-state renewable development. This would be similar to the problem in 2008 when the regulations were hastily changed for biomass and the price dropped to near zero until such time as the criteria were changed again.	p. 3
Connecticut Small Power Producers Association (Duncan Broatch)	4/15/2013	Class I Tier	Incremental hydro as 30MW seems appropriate since incremental increases in capacity are limited and will not occur to a large degree.	p. 3
Connecticut Small Power Producers Association (Duncan Broatch)	4/15/2013	Class I Tier	Changing the 'begin operation date' to 2013 will be detrimental and unfair because it will strip Class I qualification from those projects that began operation between 2003 and 2013 and currently depend on REC's for their economic viability. Also, changing the date would decrease supply and increase price. Recommend that the dates are not changed.	p. 3
Connecticut Small Power Producers Association (Duncan Broatch)	4/15/2013	Class I Tier	Omit the ability for Hydro Quebec to satisfy part of the RPS and omit the ability for HQ to sign contracts with DEEP to deliver energy to CT. 5 reasons why HQ should not have CT ratepayer monies sent to it: 1) projects will not be new and additional because of CT; 2) HQ power will displace new and indigenous power; 3) will displace contracts and energy purchases that could be supporting more local sources; 4) environmental and justice issues associated with HQ; and 5) transmission lines to Canada will have potentially enormous environmental consequences.	p. 4
Connecticut Small Power Producers Association (Duncan Broatch)	4/15/2013	Class I Tier	Instead of increasing hydro to 30 MW and bringing in HQ we should decrease the RPS by lowering the RPS Class I percentage requirements and/or pushing the dates back.	p. 5
Continental Economics, Inc. (Jonathan A. Lesser)	4/19/2013	White Paper on Hydro	The March 18, 2013 White Paper, "Incorporating Large-Scale Hydro into a Connecticut Class I RPS Sub-tier" (the "White Paper"), prepared by Sustainable Energy Advantage, LLC, presents itself as providing a blueprint for Connecticut to "take and maintain a leadership position among states in securing a 'cheaper, cleaner, more reliable' electricity supply." A careful review of the White Paper, however, reveals not so much an effort to explore methods of achieving these broad goals, but rather a rationalization for the narrower objective of acquiring hydropower from Hydro Quebec ("HQ") over the proposed Northern Pass Transmission project.	p. 2

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Environmental Energy Solutions (Joel N. Gordes)	4/4/2013	Class I Tier	Large-scale, centralized, hydro resources that use lengthy transmission to transport power over long distances into an already complex grid increases vulnerability. DEEP many not understand how introducing large-scale hydro has deep public health, safety, and grid security implications for CT. More recently, NERC, tasked with grid security for the US, has warned of higher risks from purchasing power requiring transmission that spans several states.	p. 1
Environmental Energy Solutions (Joel N. Gordes)	4/4/2013	Local Generation	The RPS has never been intended to support already mature technologies like Hydro Quebec just because they might offer a cheaper path to meet arbitrary goals that look higher.	p. 1
Environmental Energy Solutions (Joel N. Gordes)	4/4/2013	Environmental Justice	There are social justice/human rights claims as concern the Innu, a First Nations people, who have issues over Hydro Quebec's expansionist Plan Nord. We must ensure that our clean energy is "clean: in every sense of the word. Dislocation of native peoples from their land has too often occurred in the name of "progress" including the quest for cheap energy. Those Innu claims should be thoroughly investigated so we do not unwittingly support actions that dislocate people from sacred lands that we will later regret.	p. 1
Environmental Energy Solutions (Joel N. Gordes)	4/19/2013	Local Generation	In numerous DEEP and utility studies there is mention of certain renewable energy sources being significantly higher in cost than large-scale fossil and nuclear power sources. If we look at it on dollar/kWh basis, there is currently support for this argument but what is missing is valuation not merely of the cost of a kWh but of the entire value stream provided by distributed renewable energy sources.	p. 1
Environmental Energy Solutions (Joel N. Gordes)	4/19/2013	Transmission	Policymakers and regulators should be aware that large transmission projects could become the stranded cost of the future in addition to making the grid more complex and prone to failure. In 1989 Hydro Quebec experienced grid collapse due to a coronal mass ejection - could happen again, especially as we are in a solar maximum. Electromagnetic pulses (EMP) have the capacity to also inflict immense damage on critical electrical components of the grid that could render it inoperative for months. Additionally, harsh ice and snow storms that cause widespread damage to electric infrastructure should be considered. Practical actions can be taken, including purchasing power from generators closer to where the power is being consumed rather than buying blocks of power that have to be sent on transmission lines that span several states.	p. 3
Environmental Energy Solutions (Joel N. Gordes)	4/19/2013	Transmission	Hardening is not a sufficient tactic to protect the transmission. The multiple threats to the grid (list included) call for a more holistic, all-hazards approach rather than piecemeal efforts of directed task forces or obligatory PURA dockets to pick up the pieces afterwards.	p. 3
Environmental Energy Solutions (Joel N. Gordes)	4/19/2013	Environmental Justice	July 26, 2012 article included depicting Innu First Nation protest against the construction of a new dam on the Romaine River by Hydro Quebec, which they say would destroy their entire way of life. Many Innu feel that that the Charest government has ignored their concerns and traditional right to the land. The Mani-Utenam community has not signed any agreements around the Romaine project. However, H-Q has started clear cutting swaths of forest near their community for the transmission lines that will carry power from the dams.	p. 9
GDF SUEZ Energy North America (Charles Burnham)	4/19/2013	Class I Tier	Questions whether large hydro power outside the US aligns with RPS environmental goals. Hydro Quebec indicated in its own 2011 and 2012 annual reports that, on average, over the last six year, 28% of its exported power came from sources other than hydro.	p. 1
GDF SUEZ Energy North America (Charles Burnham)	4/19/2013	Class I Tier	Fail to see how a long term contract with a non-US company employing mature technology meets the goals of the RPS. Will not spur new development.	p. 2

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GDF SUEZ Energy North America (Charles Burnham)	4/19/2013	Contracted Tier	Questions the assumption made in the Study that this 'contracted tier' large hydro offers a source of renewable power 'at very competitive costs.' Notwithstanding their disagreement that such power is even renewable, they would like to see a more robust analysis of the cost of this power to CT consumers in the final version of the Study. Such analysis should include the costs of the Northern Pass Transmission project, among others.	p. 2
GDF SUEZ Energy North America (Charles Burnham)	4/19/2013	LIHI	Urges DEEP to reconsider certification by the LIHI as a prerequisite for a hydro unit qualifying as Class I. This recommendation would serve to decrease CT Class I supply served by hydro facilities.	p. 3
GDF SUEZ Energy North America (Charles Burnham)	4/19/2013	Contracted Tier	Recommend that if DEEP advocates for a 'contracted tier' of Class I, that it not limit, either based on geographic location or in-service date, the type of hydro facilities eligible for such contracts. In addition, to ensure an even playing field, DEEP should ensure that non-US facilities face the same regulatory requirements, and related costs as their domestic counterparts.	p. 3
Green Energy Committee, Hampton, CT (Kate Donnelly)	4/11/2013	Class 1 Tier	How does Canadian hydro accomplish the desired economic benefits associated with the emerging clean energy economy for CT residents? She believes it does exactly the opposite. There is no additional air quality or economic benefits to this plan. It does not provide long-term jobs for CT workers or assists the clean energy small businesses emerging across the state.	p. 1
H.Q. Energy Services Inc. (Stephen Molodetz)	4/19/2013	Contracted Tier	Supports the proposal to create a 'contracted tier' in which renewable hydro resources can compete on a limited basis to help the state of CT meet its RPS requirements. Believe that a combination of greater competition, a long-term contract mechanism and an increased renewable requirement will balance the RPS program such that the state's commitment to a renewable and affordable energy future can be achieved.	p. 1
H.Q. Energy Services Inc. (Stephen Molodetz)	4/19/2013	Tracking	Agrees with the importance and benefit of an effective verification and tracking mechanism described in section 9 of the White Paper and is prepared to work with the State of CT and stakeholders in the design of an appropriate methodology that ensures a high standard of transparency and accountability. Hydro Quebec does have experience tracking unit-specific attributes for compliance purposes and believes that there may be several options for doing so for the proposed 'contracted tier,' as demonstrated by the participation of HCUS in multiple tracking programs today; all of which are certified by an independent auditor.	p. 1
H.Q. Energy Services Inc. (Stephen Molodetz)	4/19/2013	Environmental Concerns	In the White Paper, footnote 16 on page 14 includes a reference to a document created by Synapse Energy Economics for the CLF. The characterization that reservoir hydro emits GHG at levels that are higher than combined cycle natural gas facilities is inaccurate and would like it fixed. It is accurate to state that reservoir hydro emits higher levels of GHG emissions in the first few years of operation, but emissions level off and decrease to those observed in natural lakes - and on a net life cycle basis are comparable to wind facilities and orders of magnitude lower than a combined cycle gas generator. Provides a link to Eastmain - 1 Net GHG project at www.eastmain1.org/index.html . Believes the Synapse authors incorrectly assessed this project, due to incomplete data and without the fact that GHG emissions decrease over time (from reservoirs). Provide another link: www.hydroquebec.com/rupert/en/project_en_bref.html	p. 3
Maine Department of Environmental Protection (Commissioner Patricia W. Aho)	4/19/2013	Class I Tier	Support modifications in the proposal to allow a portion of hydro to be eligible to meet renewable requirements. This reduces barriers, and strengthens a regional partnership in growing all of our renewable resources, and will better integrate Northeast electricity markets.	p. 1

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Stakeholders	Date	Main Topic	Specific Issue	Page Cite
New England Clean Energy Council (Janet Gail Besser)	4/19/2013	Class I Tier	Supports the addition of large hydro outside the RPS and urges CT to consider the establishment of a Clean Energy Standard, with the option for long-term contracting for large hydro, as a means of capturing the benefits hydro can offer CT's energy consumers, while maintaining a separate RPS with strong market signals for the scale up and growing competitiveness of the existing Class I renewables.	p. 2
New England Clean Energy Council (Janet Gail Besser)	4/19/2013	Class I Tier	The recommendation of the Draft Study to include large hydro in the RPS relies on the assertion that it will reduce RPS compliance costs because it is assumed to be available without a premium over market. The study does not include analysis to support this assumption.	p. 3
New England Clean Energy Council (Janet Gail Besser)	4/19/2013	Class I Tier	The Study states that Class I resources will compete with large hydro in a non-REC competitive market. This assertion is important because the only large hydro that will qualify under the RPS Study recommendation is from Hydro Quebec. It will be several years before hydro from the Maritimes and/or Newfoundland and Labrador will be available to serve the CT market. However, there is no analysis to indicate that Class I resources will compete with large hydro. In fact, research on the theory on bidding behavior suggests otherwise.	p. 3
New England Clean Energy Council (Janet Gail Besser)	4/19/2013	Class I Tier	The Study asserts that there is 'imminent danger' of a shortfall in new renewable generation that would trigger ACPs; however, the underlying analysis indicates that a potential shortfall will not occur until 2019 to 2022. With an emerging renewables industry that has grown at double digits per year over the last 5 years, and with new market signals introduced in the last 2 years in CT with clearer approaches to procure new renewable generation, now is the time to let the market work and not to reduce RPS growth targets.	p. 3
New England Clean Energy Council (Janet Gail Besser)	4/19/2013	Class I Tier	In recent discussions concerning proposed legislation, it has been suggested that the inclusion of large hydro in the RPS will not adversely affect 'traditional' Class I source development. However, the Study indicates that large hydro will likely crowd out Class I sources and take up the growth <u>these sources would otherwise see.</u>	p. 3
New England Clean Energy Council (Janet Gail Besser)	4/19/2013	Class I Tier	The central recommendation of the RPS Study is to include large hydro in Class I of the RPS because it will be available to CT consumers without a premium over market price. There are three questions to be considered: 1) what is the cost of large hydro and will there be a price premium over market; 2) what competitive pressures will there be to keep large hydro costs down; and 3) what are the cost trends for emerging renewables with their modular format and rapidly improving economics?	p. 4
New England Clean Energy Council (Janet Gail Besser)	4/19/2013	Class I Tier	Alternatives to adding large hydro to the RPS should be considered. The existence of large hydro market power creates a risk that costs to CT could be higher than they otherwise would be.	p. 4
New England Clean Energy Council (Janet Gail Besser)	4/19/2013	Class I Tier	Whether large hydro contracts will reduce costs - within or outside the RPS - will also depend on the RFP design, the structure of the contracts and their price in terms. To the extent contracts for large hydro are indexed to fossil fuel prices, the benefit of mitigating price volatility would be reduced.	p. 4
New England Clean Energy Council (Janet Gail Besser)	4/19/2013	Contracted Tier	It has been suggested that traditional Class I resources can exert competitive pressure on large hydro in the 'contracted tier' in the absence of competing large hydro bidders. Additional analysis is needed to support this contention. Bidding dynamics suggest that large hydro will try to price itself just under the cost of on-shore wind (likely to be lowest cost or most competitive in Class I).	p. 4
New England Clean Energy Council (Janet Gail Besser)	4/19/2013	Contracted Tier	Policies that aim to change the market structures for the next 7-12 years need to consider recent and forecasted cost trends in traditional Class I technology categories.	p. 5

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New England Clean Energy Council (Janet Gail Besser)	4/19/2013	Class I Tier	Proposed addition of existing large hydro may not meet additionality criterion that is part of what would qualify it for inclusion in the RPS. Tapping into existing large hydro could help reduce energy costs in CT if it is priced at market levels with no premium. However, it should not be included within the RPS that is serving its original goal of incenting cost-effective scale of new, emerging renewable technologies and projects.	p. 5
New England Clean Energy Council (Janet Gail Besser)	4/19/2013	Class I Tier	RPS Study and Appendix I differ in their characterization of the impacts on 'traditional' Class I energy sources of including large hydro in Class I of the RPS. Further analysis is needed of these impacts, including: 1) in-state/region economic development and jobs; 2) how large hydro fails to address CT's concern about dollars for RPS compliance leaving the state and region; 3) potential increases in transmission costs to deliver large hydro to CT; 4) potential increases in distribution costs if less distributed renewable and clean energy generation is developed; and 5) the effect on the reliability and resiliency of the grid.	p. 6
New England Clean Energy Council (Janet Gail Besser)	4/19/2013	Class I Tier	The Study asks questions about the potential future compliance costs, but then reaches a conclusion to reduce RPS growth targets for traditional Class I resources today while not forecasting a potential shortfall of new renewable generation until 2019-2022. There is time to reassess in 4-5 years whether steps are needed to avoid possible 2020 compliance costs for ratepayers. Reducing RPS traditional Class I growth targets now could actually send an unfortunate signal to renewable and clean energy developers to reduce their level of investment in competing for market share, and defer realization of renewable cost declines.	p. 6
New England Clean Energy Council (Janet Gail Besser)	4/19/2013	Contracted Tier	While the Study mentions the option of contracting for large hydro outside the RPS, it is not fully explored. NECEC suggests that looking beyond the RPS for additional ways to reduce costs for customers might lead to the creation of a new Clean Energy Standard that establishes a target for large hydro as a better way of achieving energy goals of cleaner, cheaper and more reliable.	p. 6
New England Hydropower Company, LLC	4/19/2013	Class I Tier	The methods proposed to increase percentages of Class I renewables will create financial incentives for expanding conventional, out-of-state hydro without ensuring a level playing field for small, innovative, in-state generation projects. It is estimated that CT has 68MW of untapped, clean energy available through the development of new, innovative, low-impact hydro generation projects. Installation of these projects will create jobs, diversify CT's power base, and contribute to the Class I requirements, while keeping the power generation local and limiting massive, unsocialized infrastructure costs.	p. 2
New England Hydropower Company, LLC	4/19/2013	Contracted Tier	Reclassification of 'small-scale hydro' to include facilities up to 30MW to align with neighboring states may work for consistency analysis, but in and of itself does not appear to provide a basis for meeting the state purposes for revising the RPS.	p. 3
New England Hydropower Company, LLC	4/19/2013	LIHI	Replacing the currently accepted Run-of-river requirement with receipt of Low Impact Hydro Institute certification constrains the entrance of new, innovative technologies into the market.	p. 3

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New England Power Generators Association, Inc. (NEPGA) (Sandi Hennequin)	4/19/2013	Contracted Tier	NEPGA has significant concerns with two of the proposed recommendations in the draft RPS study: 1) Allowing large-scale, government-owned hydropower to qualify as a Class I RPS resource through a new RPS Contracted Class I Tier; and 2) The comments expressed herein represent those of NEPGA as an organization, but not necessarily the position of any particular member. Providing a mechanism for the state to conduct a procurement of "contracted tier" large-scale, government-owned hydropower resources. NEPGA believes these two recommendations are motivated by a desire to grant a contract to Hydro Quebec (HQ). This is extremely problematic as the state would effectively be discriminating against in-state industrial employers such as NEPGA's members who have invested billions of dollars in Connecticut by excluding them from an opportunity to bid on a competitive Request for Proposals (RFP) while forcing them through a generator tax to pay higher taxes than the companies benefitting from a sole-source contract.	p. 2
New England Power Generators Association, Inc. (NEPGA) (Sandi Hennequin)	4/19/2013	Class I Tier	Large-scale, government-owned, mature hydro should not qualify for CT's RPS.	p. 2
New England Power Generators Association, Inc. (NEPGA) (Sandi Hennequin)	4/19/2013	Environmental Concerns	Canadian hydro does not necessarily meet RPS environmental goals.	p. 3
New England Power Generators Association, Inc. (NEPGA) (Sandi Hennequin)	4/19/2013	Transmission	Cites uncertainties for the Northern Pass Transmission Project (NPT) and the RPS study's reliance on the project, and the timeframes. Vital to weigh the likelihood of construction of the NPT considering challenges and the level of uncertainty. In October 2010, NU and HQ announced a proposed 180-mile route for the NPT, announcing an alternative route. The proposal was immediately met with opposition, with 29 towns unanimously passing resolutions in March 2011 opposing the project.	p. 6
New England Power Generators Association, Inc. (NEPGA) (Sandi Hennequin)	4/19/2013	Transmission	Large-scale, state-owned hydro is not necessarily a low-cost resource. For example, Last year, the PA Consulting Group, at NEPGA's request, conducted an independent analysis on the electricity cost and economic impacts of the Northern Pass Transmission (NPT) project, and by extension the electricity that is being proposed to be delivered over the line coming from new HQ resources. The PA Consulting report updated natural gas price forecasts from the "Early Release" version of the Energy Information Agency's (EIA) 2012 Annual Energy Outlook (AEO) and included PA's proprietary GE MAPS model. The new study found that the costs of building new transmission in Canada, new transmission in New England, recovery of costs to build a portion of the hydroelectric dams and attempts to earn some level of return suggested that "when the full economic costs of the power delivered over the NPT are considered, it becomes clear that the power is quite costly." 7 To date, other than the figure of \$1.2 Billion to construct the U.S. portion of the transmission line, no other numbers have been provided for costs associated with the NPT, including the cost of power delivered into New England over the line.	p. 7
New England Power Generators Association, Inc. (NEPGA) (Sandi Hennequin)	4/19/2013	Transmission	Included PA Consulting Group report, "Electricity Market Impacts of the Northern Pass Transmission Project" (June 2012)	Appendix

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New England Power Generators Association, Inc. (NEPGA) (Sandi Hennequin)	4/19/2013	Transmission	The recent surge in domestic natural gas production from shale reserves has transformed the outlook for future natural gas supplies and prices in the US. Projected natural gas prices in the AEO 2012 Early Release thus average nearly \$2/mmBtu below the prices projected in the 2010 AEO used in the CRA Report. The lower expected gas prices translate directly to lower expected New England power prices. And, lower expected power prices translate to smaller expected reductions in customer costs and lower expected revenues for HQ from sales into the New England energy market. With updated gas prices, assuming the power supplied is bid into the market at a zero price, the NPT Line is projected to reduce New England wholesale energy prices by approximately \$1/MWh on average over the 2016-2024 period. The associated reduction in wholesale costs to load is \$121 million in 2016, \$152 million in 2018, \$160 million in 2021 and \$152 million in 2024.	Appendix
New England Power Generators Association, Inc. (NEPGA) (Sandi Hennequin)	4/19/2013	Transmission	To ensure resource adequacy, ISO-NE wholesale market customers must purchase capacity in addition to energy. While the NPT Line is projected to modestly reduce wholesale energy prices, reductions in wholesale energy prices translate to lower energy revenues for existing and potential new generation resources in New England. To keep these resources in service and to maintain target reserve margins, capacity prices will need to increase to ensure sufficient capacity remains economically viable. Higher capacity prices will increase costs to New England consumers and offset a portion of the energy price benefits from the NPT Line.	Appendix
New England Power Generators Association, Inc. (NEPGA) (Sandi Hennequin)	4/19/2013	Transmission	Currently, HQ's intertie capacity with Ontario, New York, New England and New Brunswick is capable of delivering the total amount of surplus energy that it is developing -- even without the construction of the NPT Line. Hence, the only benefit to HQ of the NPT Line is to allow the shifting of power sales from lower priced hours over existing interties to higher priced hours over the NPT Line.	Appendix
New England Power Generators Association, Inc. (NEPGA) (Sandi Hennequin)	4/19/2013	Transmission	It is likely that the amount of energy that the CRA Report assumed would be delivered via the NPT Line is overly optimistic. CRA assumed that, with the addition of the NPT Line, energy deliveries from HQ to Ontario would be drastically reduced from those in the Base Case (i.e., without the NPT Line) in all years. And, in the early years (2015 and 2016) Ontario would actually become a small net exporter to HQ. This assumption represents a dramatic change since the market conditions that support large deliveries from HQ to Ontario in the Base Case would not be expected to change to such a drastic degree, particularly given Ontario's plan to shut down its coal plants. In addition, we note that the recently completed 1,250 MW HVDC interconnection from HQ to Ontario was built with the stated intention of increasing HQ exports to Ontario.	Appendix
New England Power Generators Association, Inc. (NEPGA) (Sandi Hennequin)	4/19/2013	Transmission	In addition, there has been substantial discussion of alternatives to expand transfer capability between HQ and New York, including for example, the Champlain-Hudson Power Express, which is a proposed HVDC line that would deliver energy from HQ to New York City. Any increase in transfer capability to markets other than New England would reduce the amount of energy available to be delivered on the NPT Line and/or increase the cost of energy delivered over NPT. Either way, the economic benefits of the NPT Line to New England would be reduced.	Appendix

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New England Power Generators Association, Inc. (NEPGA) (Sandi Hennequin)	4/19/2013	Transmission	Even with the high volume of flows over the NPT Line that the CRA Report assumed, the total revenue that HQ would receive for selling at electricity market prices consistent with the latest DOE gas price projections would barely cover the annual costs of the NPT Line and the incremental HVDC facilities that would need to be built on the Canadian side of the border. PA estimates that total annual costs for the transmission on both sides of the border will be in the range of \$40/MWh to \$45/MWh in 2015/2016. The average revenue for sales over the NPT Line in 2016 is estimated to be approximately \$44/MWh, leaving HQ with virtually no ability to cover the opportunity costs and variable costs associated with switching power sales away from other export points to the NPT Line. Simply put, projected annual energy revenues received by HQ barely cover annualized transmission construction costs. This comparison illustrates the economic challenges facing the NPT Line, but ignores other costs and revenues that would need to be considered in a comprehensive economic analysis.	Appendix
New Haven Environmental Justice Network (Chris Schweitzer)	4/19/2013	Class I Tier	Concerned that classifying Canadian Hydro would dilute the RPS. Inclusion of Canadian hydro weakens the original intent of the RPS, which is meant to encourage the growth of CT's renewable energy sector. Large hydro is a mature technology that does not need this kind of support, especially when it's CT ratepayer dollars being sent to Canada.	p. 1
New Haven Environmental Justice Network (Chris Schweitzer)	4/19/2013	Environmental Concerns	Large hydro can affect rivers and land use in ways that increase its overall environmental impact.	p. 1
New Haven Environmental Justice Network (Chris Schweitzer)	4/19/2013	Local Generation	CT-based energy options, like wind and solar, should not be decreased in any manner. Regionally-produced clean energy is the best choice for our climate and our economy, and the final study should emphasize this.	p. 1
Office of Consumer Counsel (Joseph A. Rosenthal)	4/19/2013	Class I Tier	Is supportive of considering the use of large hydro facilities to meet a relatively small portion of the RPS. OCC would be happy to work with other interested parties to develop contracts and select Canadian hydro projects or other proposals, and OCC believes that it should have a role in such processes.	p. 4
Office of Consumer Counsel (Joseph A. Rosenthal)	4/19/2013	Local Generation	Does not see how using Canadian hydro facilities to meet part of the RPS would harm in-state renewables given the very aggressive RPS requirements would remain. As far as OCC is aware, if the full 7.5% of a new 25% by 2025 RPS were met with Canadian hydro, this still leaves ample room to meet all or substantially all of CT's wind and solar potential, and would allow significant growth in fuel cells and perhaps biomass as well. In addition, the state may continue to create programs that are partially outside of the RPS (like ZREC and LREC) but that support in-state renewable energy, if the RPS does not lead to sufficient development in this state.	p. 4
Plum Creek Timber Company	4/18/2013	Class I Tier	It is true that the increase of renewable supply from Canadian hydro will increase the supply base, but Canadian hydro plus legacy biomass is still a larger supply base than Canadian hydro and no legacy biomass.	p. 2
Renewable Energy and Efficiency Business Association, Inc. (REEBA)	4/19/2013	Class I Tier	RPS Study is blind to the fact that the inclusion of large-scale hydro in the RPS, even as a renewable source that would not be eligible for Class I RECs will ultimately deter the use of other Class I renewable technologies in-state such as solar, fuel cells, and biomass because large hydro will significantly reduce the demand by utilities for RECs from in-state renewables in meeting their RPS obligations. This is unfair to the renewable energy companies that have made significant investments in CT in reliance on current policy and programs.	p. 1

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Stakeholders	Date	Main Topic	Specific Issue	Page Cite
Renewable Energy and Efficiency Business Association, Inc. (REEBA)	4/19/2013	Local Generation	Draft RPS Study neglects that importing large hydro from Canada will result in less in-state Class I generation, and thus less local job creation and the potential for in-state economic growth.	p. 1
Renewable Energy and Efficiency Business Association, Inc. (REEBA)	4/19/2013	Transmission	The RPS Study fails to take into account the significant costs to site and construct the transmission system necessary to transport large hydropower from Canada to CT. Unlike most in-state Class I sources, the transmission needed to transport large hydro from Canada will be funded by the ratepayer under cost-of-service with the utilities earning a 12% (or more) rate of return on this investment, which will cost the CT ratepayers billions of dollars that will not be reflected in the price of hydro. Without the proper analysis, we don't know the true cost of Canadian hydro compared to the cost of in-state Class I renewables such as solar, fuel cells, and biomass.	p. 1
Renewable Energy and Efficiency Business Association, Inc. (REEBA)	4/19/2013	Transmission	Draft RPS Study fails to take into account the significant time (10+ years) for the utilities to site, permit and construct the transmission system necessary. The Study assumes that the transmission system can be successfully sited and permitted in a timely manner in the face of fierce and growing opposition in states such as NH where portions of the line will pass through.	p. 2
Renewable Energy and Efficiency Business Association, Inc. (REEBA)	4/19/2013	Transmission	Draft RPS Study neglects the fact that relying on a single transmission line to transport large amounts of hydro will significantly reduce the reliability of CT's electrical power supply.	p. 2
Renewable Energy and Efficiency Business Association, Inc. (REEBA)	4/19/2013	Environmental Concerns/Environmental Justice	Large hydro from Canada comes with significant environmental impact. In addition to the development of 100s of miles of transmission lines through heavily forested regions in New England, hydropower harms fish, displaces Native communities, and also redirects rivers and floods vast amounts of land.	p. 2
Renewable Energy and Efficiency Business Association, Inc. (REEBA)	4/19/2013	Class I Tier	The Draft fails to appreciate that contracting for large amounts of hydro from Canada will send the opposite message of CT's current renewable energy programs including microgrids, ZREC and LREC.	p. 2
Renewable Energy New England (RENEW) (Francis Pullaro)	4/19/2013	Contracted Tier	RPS assumes large Canadian hydro can be obtained at no premium to the market. Further study is necessary to examine the true costs of a contract for Canadian hydro and provide details on the type of energy product, includes both positive and negative environmental attributes. If existing energy from Hydro Quebec is truly at no premium to the market CT's distribution utilities are not precluded from contracting to purchase Canadian hydro to serve their Standard Service and Supplier of Last Resort customers.	p. 2
Renewable Energy New England (RENEW) (Francis Pullaro)	4/19/2013	Environmental Concerns	Any import of this 'system power' from Hydro Quebec is likely to include fossil fuel derived non-renewable energy rather than electricity generated entirely by hydropower.	p. 4
Renewable Energy New England (RENEW) (Francis Pullaro)	4/19/2013	Class I Tier	While the benefits from long term contracting are well-established, neither the RPS nor the White Papers contain any analysis on how expanded CT long term contracting opportunities for Class I resources can lower the RPS compliance costs. RENEW requests that this analysis be performed and be presented in the RPS Study as an alternative to all the scenarios involving procurement of large Canadian hydro used to offset a substantial portion of CT's RPS requirements.	p. 6
Renewable Energy New England (RENEW) (Francis Pullaro)	4/19/2013	Transmission	Incremental amounts of hydro imports from Canada will require new transmission inflating the costs of any such purchase, while simultaneously impairing its near-term viability. The stalled Northern Pass transmission project illustrates that CT cannot and should not rely on the timely construction of new transmission capacity linking Canada and southern New England.	p. 7

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Renewable Energy New England (RENEW) (Francis Pullaro)	4/19/2013	Class I Tier	Concerned about a near term procurement of large Canada with any available competition in solicitation. Until the Maritime Canada hydro and transmission projects are built, there may be a lack of competition for HQUS in the contracted tier. While one of the White Papers raises the issue of a supplier controlling all the eligible supply, it does not sufficiently explore what restrictions might be necessary to prevent a supplier from controlling prices or excluding competition.	p. 8
Renewable Energy New England (RENEW) (Francis Pullaro)	4/19/2013	Class I Tier	Requests that DEEP conduct further analysis to determine whether Class I resources can provide sufficient competition and how a solicitation must be designed to meet that objective.	p. 8
Renewable Energy New England (RENEW) (Francis Pullaro)	4/19/2013	Class I Tier	CT ratepayers should not subsidize Quebec government sponsored projects. Large hydro's ability to compete without incentives or out-of-market support makes it unsuitable for RPS eligibility and REC revenue or subsidies through above market contracts.	p. 8
Renewable Energy New England (RENEW) (Francis Pullaro)	4/19/2013	Contracted Tier	Today, Canadian hydro may play a role in making long distance transmission upgrades more economic, improving the reliability of the power system by diversifying the type of resources, and providing that reliability benefit without carbon emissions that, in the long term, are lower than natural gas resources. The RPS report should explore ways to lower the cost of new transmission to support increasing amount of variable renewable resources and/or provide cleaner and more reliable balancing power.	p. 9
Retail Energy Supply Association (Joey Lee Miranda)	4/19/2013	Contracted Tier	Depending on their structure, modifications to the RPS and development of a new contracted-tier compliance obligation could negatively impact customers and increase costs in direct contravention of the Act's stated goals of seeking to maize costs.	p. 3
Retail Energy Supply Association (Joey Lee Miranda)	4/19/2013	Contracted Tier	DEEP has performed no analysis to support a finding that Canadian hydro can be purchased at little or no premium. DEEP simply assumed that this could occur.	p. 7
Rivers Alliance of Connecticut (Margaret Miner)	4/19/2013	Environmental Concerns	Large-scale hydro is damaging to the environment, further lowering the RPS to include hydro pushes the state away from its Global Warming goals.	p. 2
Rivers Alliance of Connecticut (Margaret Miner)	4/19/2013	Contracted Tier	It will lower the value of Class I electricity, because the premium prices and other economic benefits of generating Class I depend (perhaps unfortunately) on a supply-and-demand market mechanism. Increase the supply of sub-standard Class I, and the value drops. Gresham's law: Bad money drives out good. Ditto for bad energy.	p. 2
Rivers Alliance of Connecticut (Margaret Miner)	4/19/2013	Contracted Tier	It reinforces the flawed concept that RPS requirements are the main reason for rate increases across the nation. This claim, promulgated by groups like ALEC, is not borne out by the data, which indicate that the RPS accounts for a relatively small percent of rate increases. It is not unreasonable to pay more for a better product.	p. 2
Rivers Alliance of Connecticut (Margaret Miner)	4/19/2013	Environmental Concerns	It implies that more local hydropower of all sorts might be good for the state. But Connecticut originally rejected all hydropower for Class I because of its destructive effects on rivers. Since 2003, the law has been to allow low-impact, run-of-river hydropower to qualify for Class I. Hydro Quebec is super-high impact, both in generation and transmission. If HQ's operations are deemed acceptable by Connecticut, what could be wrong with similar projects here?	p. 2
Rivers Alliance of Connecticut (Margaret Miner)	4/19/2013	Class I Tier	Include only low-impact hydropower in Class I. Tighten the definition.	p. 3
Rivers Alliance of Connecticut (Margaret Miner)	4/19/2013	Environmental Concerns	Agrees with raising the ceiling on size from 5MW to 30MW. The Connecticut definition has always lacked two important elements: 1) a requirement for fish passage; 2) a ban on using new dams or dams identified for removal. Note, there are 5,000 dams in Connecticut already. We give the text of our proposed change as a postscript.	p. 3

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Sierra Club, Connecticut Chapter (Marcia Wilkins)	4/11/2013	Class I Tier/Environmental Concerns	Oppose allowing large-scale high-impact Can. Hydro to qualify for Class I. Class I is for clean energy. Large-scale hydro causes the flooding of hundreds of acres of forest by channeling and diverting rivers, raising mercury levels in water, producing GHGs and displacing native populations. Large-scale hydro does not need the financial incentives offered to encourage the development of wind and solar and thus will ruin the development of truly clean energy.	p. 1
Sierra Club, Connecticut Chapter (Marcia Wilkins)	4/11/2013	Local Generation	Sending taxpayer money out of the country reduces the benefits of renewable energy investments within CT and New England. It undermines the development of clean energy within our region as well as the green jobs that would result from this development. In our neighboring state of MA, legislation supporting clean energy has helped create 65,000 local jobs.	p. 1
Star Power LLC (Benjamin M. Baker)	4/17/2013	Class I Tier	Concerned that the Draft endorses the dilution of the RPS. Classifying large hydro from Canada as a Class I renewable weakens the original intent of the RPS, which is meant to encourage the growth of our state's renewable energy sector. Hydro is a mature technology that does not need this kind of support, especially CT ratepayer dollars sent out of the country.	p. 1
Star Power LLC (Benjamin M. Baker)	4/17/2013	Environmental Concerns	Large hydro can affect rivers and land use in ways that increase its overall environmental impact.	p. 1
TransCanada Power Marketing Ltd.	4/19/2013	Contracted Tier	Restructuring acknowledges that its requirements for the "contracted tier" convey a heavy preference for hydropower imported from Canada. Its requirement for a post July, 2003 construction date virtually assures eligible hydropower would be sourced from Canada, as very little, if any, new hydropower has been constructed in the U.S. northeast after July, 2003. Although companies such as TransCanada, Brookfield, and First Light are all owners of significant amounts of hydroelectric generation located in New England, Restructuring is drafted to virtually exclude participation by these companies in any long term procurement because of the age of facilities they own.	p. 2
TransCanada Power Marketing Ltd.	4/19/2013	Contracted Tier	Restructuring assumes that the "contracted tier" will provide Connecticut with lower cost power than would otherwise be realized through the NEPOOL competitive power markets. The costs of the newly constructed Canadian projects (post July, 2003) are well known, however. Further, the cost of transmission that must be allocated to this power is also well understood, whether based on existing or new transmission facilities. Accordingly, it's not at all clear that the Canadian hydropower from new facilities provides an economic advantage over domestically-sourced power if constrained to price at levels commensurate with its cost.	p. 2
TransCanada Power Marketing Ltd.	4/19/2001	Contracted Tier	U.S.-based electric generators will expect that antidumping protocols are maintained and adhered to in any purchase of electricity by Connecticut from Canadian sources. The United States International Trade Commission (USITC) defines dumping as "when a foreign producer sells a product in the United States at a price that is below that producer's sales price in the country of origin ("home market"), or at a price that is lower than its cost of production." The cost of the specific facilities used to provide the "contracted tier" power are directly relevant to the dumping analysis. In an antidumping investigation, the USITC determines whether imports that have been found to be dumped (sold at less than fair value in its home market) materially injure or threaten to materially injure a U.S. industry.	p. 2

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TransCanada Power Marketing Ltd.	4/19/2013	Contracted Tier	As previously stated, the Restructuring proposes that the "contracted tier" Canadian hydropower would have no RECs attached with it. In a similar fashion, Connecticut must make clear that any Class I power procured in the "contracted tier" must likewise be procured without RECs. In this manner, Connecticut ratepayers will get the advantage of "apples to apples" comparisons of power priced on an energy only (or energy plus capacity) basis. Otherwise, Canadian hydropower competitors will receive an unfair pricing advantage. If Class I resources were required to compete on a RECs-attached basis, the Canadian hydropower sellers would be able to price up to the level of energy plus REC value, while providing no RECs of their own.	p. 2
TransCanada Power Marketing Ltd.	4/19/2013	Contracted Tier	Connecticut ratepayers are poorly served when competition is artificially limited and they are expected to pay the resulting price. Restructuring's requirement that eligible hydropower is limited to resources constructed post July, 2003 is artificial and inappropriately limits competition. Even worse, at present the restriction may have the effect of limiting competition to a single competitor, Hydro Quebec. The restriction would enable Hydro Quebec to price its sale up to the level of Class I resource energy plus REC value. This is because buyers of "contracted tier" power would willingly pay any price less than the cost of Class I resources since the "contracted tier" power can displace the buyer's Class I requirements.	p. 3
TransCanada Power Marketing Ltd.	4/19/2013	Contracted Tier	Restructuring's recommendations have two significant consequences. First, the renewable portfolio standards of most states were implemented to get new renewable projects built. The "contracted tier" procurement is government intervention in the region's competitive power market aimed at preferentially importing existing hydropower. There are no barriers preventing Hydro Quebec or any Canadian generator from independently exporting power into New England. It makes little sense to disqualify existing hydropower in New England from competing in the procurement. Second, Hydro Quebec's sole shareholder is the Quebec government. To the extent that the "contracted tier" results in paying above market subsidies for imports, exporting Connecticut ratepayer dollars to subsidize a Canadian provincial government on a long term contract basis while ignoring New England generators is poor policy.	p. 3
TriState Solar Alliance (Don Van Rhyn)	4/19/2013	Local Generation	Classifying large hydro from Canada as a Class I renewable weakens the original intent of the RPS, which is meant to encourage the growth of our state's renewable energy sector. Hydropower is a mature technology, and CT ratepayer dollars do not need to be sent of the country to support it.	p. 2
TriState Solar Alliance (Don Van Rhyn)	4/19/2013	Environmental Concerns	Large hydro can affect rivers and land use in ways that increase its overall environmental impact.	p. 2
Trout Unlimited, Connecticut Chapter (Alicea Charamut)	4/11/2013	Environmental Concerns	Would like to see protections for our rivers and streams. "Class 1 renewable energy source a run-of-river hydro facility provided such facility has a generating capacity of not more than thirty megawatts, does not cause an appreciable change in the river flow, is not based on a new dam or a dam identified by the Commissioner as a candidate for removal, meets site-specific state and federal standards for water quality, fish passage and healthy river flow as determined by the Commissioner in consultation with state and federal agencies having oversight over hydro facilities, and began operation after July 1, 2003, or is incremental new energy up to 30MW from increased capacity or efficiency at such a facility.	p. 1

Hydro-related Comments to draft RPS Study

Stakeholders	Date	Main Topic	Specific Issue	Page Cite
Sierra Club (Tamara Evans, Joshua Berman)	4/19/2013	Class I Tier	Strongly opposes DEEP's recommendation to weaken Connecticut's RPS by making large-scale hydroelectric power eligible for use in a Class I "contracted" sub-tier under the RPS. Any such action is premature and will undermine the effectiveness of the RPS by shifting resources away from the development of in-state and in-region renewable energy sources like wind and solar to fund a distant, mature industry that is not environmentally benign. Large-scale hydropower dams disrupt rivers and habitat. New hydropower floods lands and the decomposing biomass releases carbon dioxide and methane, potent greenhouse gasses. Funding these projects with ratepayer subsidies will not provide additional air quality, global warming or reliability benefits.	p. 2
Sierra Club (Tamara Evans, Joshua Berman)	4/19/2013	Class I Tier	When the Connecticut General Assembly created the RPS in 1998, they found and declared that "[t]he generation of electricity must be achieved in a manner that does not endanger the public health or safety and that minimizes negative environmental impacts." H.B. 5005, Pub. Act 98-28 (codified at Conn. Gen. Stat. 16-244(9)). The goal of an RPS is to ensure that resources that might otherwise not be built are included in a state's generating portfolio based on the recognition that these resources provide distinct benefits to the state by protecting the public health and safety and minimizing negative environmental impacts. DEEP's proposal to adjust the resources that qualify for Class I RECs to include Canadian hydropower is in direct tension with this goal.	p. 5
Sierra Club (Tamara Evans, Joshua Berman)	4/19/2013	Environmental Concerns	New, large, out-of-region hydropower facilities should remain excluded from Class I. The primary objectives of the proposed Contracted Class I Tier are to "advance clean energy renewable goals, reducing the cost of meeting the RPS while providing similar environmental benefits." Draft Study at 21. The draft study states that large-scale hydro does not produce emissions, and that "[t]o the extent that [hydro] replace[s] traditional generation [it] will ... have the same ability to reduce harmful emissions such as CO ₂ , NO ₂ , and SO _x " as other renewable resources like regional wind. This is not accurate. As the Synapse Report's study of the environmental impacts of hydropower demonstrates, greenhouse gas emissions from Boreal large hydro are significantly greater than typically assumed, and may be nearly 2/3 of those for a natural gas power plant. Synapse Report at 2.	p. 7
Sierra Club (Tamara Evans, Joshua Berman)	4/19/2013	Environmental Concerns	Moreover, there are no "additional" air quality, global warming, or reliability benefits from letting hydropower that already exists reduce the requirement to build new renewables in Connecticut and New England. See Incorporating Large-Scale Hydro into a Connecticut Class I RPS Sub-tier, Sustainable Energy Advantage, LLC, (March 18, 2013) at 3 ["App. I"]. As DEEP's own commissioned study notes, a PPA designated as large-scale hydro supply would not create incremental GHG benefits due to displacement of fossil generation in New England because those benefits are already accounted for by NEPOOL directly or indirectly. Only incremental imports from incremental supply will reduce GHG emissions from NE fossil fuel supply. "Dynamics of this sort should be taken into account in determining the actual GHG impact of contracted Class I tier PPAs." See App. I at 16 (Footnote 17, recommending requiring greenhouse monitoring/disclosure of incremental impacts compared with a historic baseline).	p. 7

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Sierra Club (Tamara Evans, Joshua Berman)	4/19/2013	Transmission	DEEP's draft study also acknowledges that the environmental impacts associated with building and transmitting power from distant hydro facilities in Canada are greater than the benign impact of rooftop solar installations and fuel cells located in Connecticut." Draft Study at 24. Hydro facilities with dams disrupt rivers and other habitat. New facilities flood land, and release GHGs as flooded vegetation decomposes. For these reasons, Canadian hydropower fails to minimize negative environmental impacts or protect Connecticut from climate-related public safety threats. The Sierra Club recommends that any small hydro facility qualify as a renewable resource only if it is run-of-the-river and less than 5 MW, which will help ensure that the environmental impacts of the facility are minimal. While the privately established LIHI standard was once the gold standard for high quality hydropower plants, we are concerned that this is no longer adequate to safeguard river health, and for that reason cannot support any proposal to rely on this certification.	p. 7
Sierra Club (Tamara Evans, Joshua Berman)	4/19/2013	Local Generation	DEEP's proposal allows a mature technology, which does not need subsidies, to displace and disrupt the market for Class I renewable energy sources for which the RPS was designed. DEEP proposes that large scale hydropower be allowed to displace 2 percent of the Class I target in 2014 increasing by 1 percent annually up to a maximum of 4.5 percent in 2020 and 7.5 percent in 2025. See App. I at 22. This could mean that in some years there would be no demand for any additional Class I renewable energy sources beyond Canadian hydropower. The proposed changes to the Class I definitions can also impact the value of past investments, and future willingness for investors to invest for fear of further changes that will unpredictably cause investments to become uneconomic. This could undermine other goals of RPS, including the goal of "accelerating deployment of other renewable energy technology in Connecticut at prices approaching grid parity." App. I at p. 5	p. 8
Sierra Club (Tamara Evans, Joshua Berman)	4/19/2013	Transmission	the transmission costs associated with interconnecting Canadian hydropower are equivalent to or higher than those associated with other regional renewable generation options even ignoring cross-border transmission costs outside of New England. For example, a 5.5 GW on- and off-shore build-out could be achieved at comparable cost to interconnecting Canadian hydro according to an ISO-NE Power System Study. The New Brunswick interchange has an estimated midrange cost of \$2.0 billion (in 2009\$), and would make available 1.5 GW of new capacity. This equates to \$1,333/kW (in 2009\$) and \$1,408/kW in 2012\$, higher than the \$1,109/kW in 2009\$ (\$1,171/kW in 2012\$) ISO-NE projected for a 5.5 MW of on- and off-shore wind build-out. Likewise, the Québec interchange has an estimated midrange cost of \$1.6 billion (in 2009\$), and would make 1.5 GW of new capacity available. This equates to \$1,067/kW in 2009\$ and \$1,126 in 2012\$, directly comparable to the 5.5 MW on- and off-shore wind build-out.	p. 8

Procurement-related Comments to draft RPS Study

Stakeholders	Date	Main Topic	Specific Issue	Page Cite
Appalachian Mountain Club (Susan Arnold)	4/18/2013	Hydro procurement	Recommends LIHI certification for hydro.	p. 2
Brookfield Renewable Energy Group (Jon Norman)	4/19/2013	Contracted tier	Recommends at least 2% of contracted tier to be "maintenance" renewables and wants competitive solicitation and wants GIS type tracking.	pp. 2-6
Capital Power Corporation (Michelle C. Gardner)	4/19/2013	Regional procurement	Has grave concerns with the proposed Contracted Tier for large scale hydropower contained in the RPS Study, and the prospect of using in-state funding to subsidize out-of-state resources.	p. 2
Clean Energy Finance and Investment Authority (CEFIA) (Bryan T. Garcia)	4/19/2013	Regional procurement	CEFIA has no recommendations with respect to DEEP being given the authority to participate in a regional procurement of Class I resources.	p. 8
The Connecticut Light and Power Company (CL&P) (Joaquina Borges King)	4/19/2013	Support contracted tier	Supports carve-out for large hydro, and wants details outlined regarding the procurement process & the EDCs' role in that process.	p. 2
Continental Economics, Inc. (Jonathan A. Lesser)	4/19/2013	Regional procurement	Procurement of large quantities of single-sourced hydroelectric generation by the State from HQ, which will also control the transmission lines over which the electricity will be delivered, will clearly exacerbate market power issues.	p. 2
GDF SUEZ Energy North America (Charles Burnham)	4/19/2013	Regional procurement	Recommends an open competitive process.	p. 4
H.Q. Energy Services Inc. (Stephen Molodetz)	4/19/2013	Hydro procurement	Verification and tracking is possible.	p. 3
New England Power Generators Association, Inc. (NEPGA) (Sandi Hennequin)	4/19/2013	Regional procurement	NEPGA believes that state-sponsored PPAs are not the best way to promote resource development at the lowest cost and risk for consumers.	p. 3
Office of Consumer Counsel (Joseph A. Rosenthal)	4/19/2013	Hydro procurement	Supports use of large hydro.	p. 3
Renewable Energy and Efficiency Business Association, Inc. (REEBA)	4/19/2013	Hydro procurement	Importing large scale hydro from Canada will result in less in-state Class I generation.	p. 2
Renewable Energy and Efficiency Business Association, Inc. (REEBA)	4/19/2013	Hydro procurement	Cites significant costs to site and construct the transmission system necessary to transport large-scale hydropower from Canada to CT.	p. 3
Renewable Energy New England (RENEW) (Francis Pullaro)	4/19/2013	Hydro procurement	RPS Report miscalculated high cost of hydro.	p. 2
Retail Energy Supply Association (Joey Lee Miranda)	4/19/2013	Regional procurement	Incorporating long-term contracts into the RPS will increase costs to ratepayers.	p. 3
Rivers Alliance of Connecticut (Margaret Miner)	4/19/2013	Regional procurement	The state should use long-term contracts to try to stabilize costs, but not with large hydro.	p. 1
Sierra Club (Tamara Evans, Joshua Berman)	4/19/2013	Hydro procurement	Public comment period on the RPS study should precede any action on legislative proposals. No bill should move forward before the public has a chance to comment on it and before the study is finalized. Otherwise, the process of releasing a draft and accepting public comments is an empty gesture.	p. 1
Sierra Club, Connecticut Chapter (Marcia Wilkins)	4/11/2013	Long-term solicitation	Wants long-term contracts within "the region" (not Canada).	p. 1
TransCanada Power Marketing Ltd.	4/19/2013	Regional procurement	Antidumping protocols are maintained and adhered to in any purchase of electricity by Connecticut from Canadian sources.	p. 2
TransCanada Power Marketing Ltd.	4/19/2013	Regional procurement	Canadian hydropower would have no RECs attached with it. In a similar fashion, Connecticut must make clear that any Class I power procured in the "contracted tier" must likewise be procured without RECs.	p. 3
TransCanada Power Marketing Ltd.	4/19/2013	Regional procurement	The "Contracted Tier" definition should be opened to include all hydropower, regardless of vintage.	p. 3
TriState Solar Alliance (Don Van Rhyn)	4/19/2013	Regional procurement	Regionally-produced clean energy is the best choice.	p. 2

Other Comments to draft RPS Study

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Robert Fromer	4/15/2013	Cost to Ratepayers	No detailed life cycle cost analysis identified by DEEP to permit rational suggestions for reducing the cost to electric ratepayers. Criteria should be established for Energy Assurance (EA), which would significantly impact the cost structure. Without appropriate forensic cost auditing, it is impossible to recommend rational and reasonable options for minimizing costs to ratepayers. Any suggestions from the public are purely speculative.	pp. 8-9
Ahna Johnson	4/19/2013	Efficiency	Study needs to evaluate the potential of energy efficiencies to help CT meet its RPS goals.	p. 1
Martha Kelly	4/11/2013	Transparency	Process for the report and legislation lacks transparency.	p. 1
Martha Kelly	4/11/2013	Solar Energy	Should consider additional ways to support solar ie. installation at landfills.	pp. 1-2
Gian Morresi	3/28/2013	Instate renewables	Legislature needs to make sure this will not dilute future growth of in-state renewables.	p. 1
John O'Brien	4/17/2013	Solar Thermal	Recommends including solar thermal in Class I.	p. 1
Kimberly A. Stoner	4/18/2013	Efficiency	Study needs to evaluate the potential of energy efficiency to help CT meet its RPS goals.	p. 1
350CT.org (Ben Martin)	4/17/2013	Solar Energy	CT needs to make sure the RPS increases solar and wind options.	p. 2
350CT.org (Ben Martin)	4/17/2013	Efficiency	Study needs to be conducted to fully grasp how improvements to energy efficiency can help CT reach its RPS goals.	p. 2
Ameresco, Inc. (Peter Wallis)	4/19/2013	Class III	Wants to ensure the proposed changes to Class III would not effect eligibility of demand side management projects.	p. 3
American Forest & Paper Association (Peter Brown)	4/11/2013	Class III CHP	Supports the CHP recognition.	p. 3
Clean Energy Finance and Investment Authority (CEFIA) (Bryan T. Garcia)	4/19/2013	Thermal Energy	Include thermal energy as Class I renewable energy source.	pp. 4-5
Clean Energy Finance and Investment Authority (CEFIA) (Bryan T. Garcia)	4/19/2013	Soft Cost for renewable energy	Recommends policy for lowering permitting fees and streamline others processes; passage of legislation that would allow for on-bill financing to support the deployment of in state renewable sources; commercial property tax exemption.	p. 5
Connecticut AFL-CIO (John W. Olsen, Lori J. Pelletier)	4/17/2013	Solar Thermal	Opposed to excluding solar thermal from Class I.	p. 1
Connecticut AFL-CIO (John W. Olsen, Lori J. Pelletier)	4/17/2013	Economic Benefits	Renewable energy proposals should come from in-state where they can create jobs and help CT's economy.	p. 1
Connecticut Fund for the Environment (Mark LeBel)	4/19/2013	Efficiency	Lowering the demand for electricity will reduce the demand for Class I RECs.	p. 2
Connecticut Geothermal Association (Guy Wanegar)	4/11/2013	Thermal Energy	Thermal energy needs to be included in the CT RPS . No analysis has been done to substantiate the decision to not include thermal energy in Class I.	p. 1
Connecticut Geothermal Association (Guy Wanegar)	4/19/2013	Definition	Ask for clarification on the difference between "geothermal" and "geothermal heat pump" technology.	p. 1
Connecticut Geothermal Association (Guy Wanegar)	4/19/2013	Thermal energy	Troubled that the Department wants to change "renewable energy sources" to renewable electricity sources" in CGS Sec 16-245.	pp. 1-2
Connecticut Industrial Energy Consumers (James S. King)	4/19/2013	Class III	Supports the elimination of support for conservation projects administered by the utilities.	pp. 6-7
Connecticut Thermal REC Coalition	4/18/2013	Thermal Renewable Energy RECs	Thermal energy should be included in the RPS to help reduce need for Class I RECs and help reduce ratepayers cost. Thermal energy meets all four key criteria for RPS goals.	p. 1
Covanta Energy Corporation (Michael J. Cicchetti)	4/19/2103	Energy from Waste	Expresses information pertaining to Class I inclusion of Energy from Waste and the affordability and benefits it offers CT ratepayers.	pp. 1-7 + attachments
Environment Northeast (Bill Dorbos)	4/19/2013	Efficiency	Energy efficiency is paramount to the RPS modeling.	p. 2
Environment Northeast (Bill Dorbos)	4/19/2013	Economic Benefits	Would like to see the study acknowledge the numerous economic and environmental benefits of renewable energy.	p. 3

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Environmental Energy Solutions (Joel N. Gordes)	4/4/2013	Transparency	Worried about this becoming law before public comment is finished.	p. 1
Green Energy Committee, Hampton, CT (Kate Donnelly)	4/11/2013	Solar Energy	Need more of a commitment to residential solar programs.	p. 1
Green Energy Committee, Hampton, CT (Kate Donnelly)	4/11/2013	Virtual Net Metering	Businesses, residents and municipalities need virtual net metering to help create clean energy in one building and use it in another.	pp. 1-2
Hydro Dynamic Engineering, LLC (John F. Sima III)	4/10/2013	Thermal Energy	Thermal energy needs to be included in the RPS, many benefits and cost savings.	pp. 1-2
Kimberly-Clark Corporation (Susan Bruce)	4/19/2013	Class III	Strongly supports the recommendation to promote development of new and continued operation of existing CHP resources.	p. 2
Kimberly-Clark Corporation (Susan Bruce)	4/19/2013	Class III	Requests that the final study consider factors that will have a dampening effect on Class III credit prices and what methods will be used to monitor the Class III REC market.	pp. 6-7
Office of Consumer Counsel (Joseph A. Rosenthal)	4/19/2013	Class III	Study should consider removing the floor price for Class III RECs.	p. 5
Phoenix Power, Inc. (Dan Lessard)	4/19/2013	Thermal Energy	Identify Thermal Energy as Class I.	p. 2 + Petition
Renewable Energy and Efficiency Business Association, Inc. (REEBA)	4/19/2013	Class III	Concerned with third party contracts and the affect these changes will have; will prior contracts be eligible?	p. 3
Renewable Energy and Efficiency Business Association, Inc. (REEBA)	4/19/2013	Thermal Energy	Study inappropriately excludes thermal energy from Class I.	p. 3
Sierra Club, Connecticut Chapter (Marcia Wilkins)	4/11/2013	Natural Gas	Expansion of natural gas does not provide a significant reduction in GHG emissions.	p. 1
Sierra Club, Connecticut Chapter (Marcia Wilkins)	4/11/2013	Trash Incinerators	Trash incinerators should not be included in Class I.	p. 1
Sierra Club (Tamara Evans, Joshua Berman)	4/19/2013	Transparency	DEEP submitted a bill prior to public comment deadline.	p. 1
Skyline Innovations, Inc. (Robin Dutta)	4/11/2013	Solar Energy	CT needs to maximize the benefits of solar for electricity and solar water heat. This would bring jobs to CT reduce consumer energy costs and bring solar to businesses that might not otherwise be able to step into the solar arena.	p. 3
Star Power LLC (Benjamin M. Baker)	4/17/2013	Solar	Report does encourages the opposite of encouraging renewable growth in CT.	p. 1
Star Power LLC (Benjamin M. Baker)	4/17/2013	Efficiency	Study needs to analyze how energy efficiency can help CT meet it's RPS goals and offset some of the shortfalls of supply.	p. 1
Solar Connecticut (Michael Trahan)	4/19/2013	Solar Thermal	Solar thermal should be included in Class I; asking that DEEP use photovoltaics rather than solar to avoid confusion (in current state statutes, OLR analysis, the DEEP website, Public Act language, etc.).	p. 3
TriState Solar Alliance (Don Van Rhyn)	4/19/2013	Efficiency	Study needs to evaluate the potential of energy efficiencies to help CT meet its RPS goals.	p. 2