



State of Connecticut

Office of Consumer Counsel

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The Energy and Technology Committee
April 6, 2009

H.B. 6632, AAC ENERGY EFFICIENCY AND THE COORDINATION OF ENERGY EFFICIENCY PROGRAMS

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Presented by Victoria Hackett

The Office of Consumer Counsel (OCC) supports H.B. 6632, AAC Energy Efficiency and the Coordination of Energy Efficiency Programs with some suggested revisions, as further set forth below.

OCC believes it would be beneficial to have one board overseeing the Connecticut Clean Energy Fund (CCEF), the Conservation and Load Management (C&LM) Fund, gas conservation funds, the Fuel Oil Conservation (FOC) Fund and municipal conservation funds. Because of its proven track record of innovative program development and the processes that have been developed at the Department of Public Utility Control for oversight, we believe that the Energy Conservation Management Board (ECMB) provides an excellent model for the proposed Energy, Efficiency and Renewable Resources Board.

Currently, there is significant overlap among the programs offered through these funds, and there is potential for much more coordination and cost effective use of these funds. Combining oversight authority should lead to increased and more efficient program coordination. Moreover, having one point of reference would be less confusing for customers who wish to participate in programs as well as vendors whose businesses involve program implementation.

Another benefit of combining oversight of these funds should be consistent measurement and verification among programs. Currently, the C&LM Fund has the most intensive evaluation process of the various funds, largely because its role as a bidder in ISO New England's forward capacity market requires more stringent measurement and verification. The programs offered through the funds are increasingly being proposed as resources both at ISO New England and through Connecticut's integrated resource planning process. Thus, measurement and verification of all of these programs must receive greater focus so that we can more accurately verify the claimed savings and determine the extent to which the programs can be treated as a resource as compared to generation and transmission resources.

OCC does have a few suggestions for changes to Raised Bill 6632, including the following:

- The program evaluation function should be carried out by a neutral third party rather than the board that develops and oversees the programs.
- Section 5(c) should be reconciled with Section 5(d) to eliminate the annual filing requirement under Section 5(c) and provide that a comprehensive renewable resource plan be made available for public hearings, provided to the General Assembly and submitted to the DPUC, as specified in Section 5(d), every two years instead of every ten years.
- The proposed membership of the Board could be reduced somewhat, as twenty-two members could provide an unwieldy group. OCC looks forward to hearing the testimony of others on the existing boards as to the ideal composition of the proposed new board.

In sum, OCC supports this bill in concept and is ready and willing to work with all parties to address these suggested revisions as well as any others that may be necessary.