

**Comments from the Northeast Energy Efficiency Council-  
Connecticut Chapter  
To The CEAB  
Regarding Connecticut's Electricity & Efficiency Plans  
February 11, 2010**

Thank you for giving the Northeast Energy Efficiency Council- Connecticut Chapter, the opportunity to provide comments to the Connecticut Energy Advisory Board (CEAB) on the recently submitted *Integrated Resource Plan for Connecticut* (IRP) prepared by United Illuminating (UI), Connecticut Light & Power (CL&P) and The Brattle Group. The Northeast Energy Efficiency Council-CT Chapter is a business association of the energy efficiency industry. NEEC-CT was formed to help member companies grow and prosper in a challenging environment, by providing a voice for the industry to support and expand business opportunities for efficiency companies.

Connecticut is a leader in providing cost effective energy efficiency programs to electric utility customers. This is true for both residential and commercial customers. The Connecticut Energy Efficiency Fund is nationally recognized for its part in Connecticut's energy efficiency infrastructure. The investments in energy efficiency continue to grow Green Jobs in the state and save residential and commercial customers a great deal. For every \$1 invested consumers on average save \$4.00. The benefits are tremendous for the consumers and the environment, and using the dollars provides a clear example of how businesses and organizations can employ environmentally sound practices without sacrificing the bottom line.

In 2007, Connecticut passed legislation directed at building upon the success of existing efficiency investments. This is where the 2010 IRP is gathering its directive. However, NEEC-CT believes the IRP does not recommend the best level of investment. We urge the CEAB to implement the All Cost-Effective Strategy (\$187 million a year) instead of the Target Strategy (\$125 million a year). The difference would generate \$300 million more in customer savings per year than the Target Strategy. This is a huge difference that should be implemented.

The All Cost Effective Strategy will also help the state meet its environmental goals - the annual level of additional emissions reductions.

This savings would hopefully stay in the state helping generate more jobs, lower bills, and lead to a stronger economy.

As we all continue to deal with the fallout of the economic meltdown of the past year, we need to keep in mind the opportunity to rebuild our economy in the most “sustainable” fashion possible, in both meanings of the word. Pursuing the All Cost-Effective level of DSM investment would also provide additional collateral benefits by simultaneously pushing several publicly stated agendas of the CEAB, DPUC, ECMB, Governor and Legislature. Investing in the All Cost-Effective Strategy of DSM asset acquisition speaks directly towards our State’s stated position on becoming a leader in Green Jobs. Every job in energy efficiency is by definition a Green Job. Each person trained by Connecticut technical schools, Universities, and Colleges in a Green Job would benefit by entering the workforce in their home state, reducing the flight of our young people to other states. Several years ago, the State required all new buildings funded with taxpayer funds to be LEED Silver (Leadership in Energy and Environmental Design) or higher. Increasing incentives for energy efficiency measures will help pay for the implementation of LEED Certified buildings as well. It has been shown in several studies that energy efficiency incentives help finance not only the incremental increase in efficiency they are aimed at, but also allow the reallocation of capital to other Green Strategies (LEED Points) like the use of locally manufactured equipment, use of low VOC paints, adhesives, etc. which increase local employment and reduce health risks. Reducing asthma in children is also a potential benefit by reducing emission by some of the States’ dirtiest power plants.

We urge the CEAB to endorse the All Cost Effective level of investment in order to meet the requirements of PA 07-242 and bring economic, environmental and job benefits of doing so to the state.

Thank you for this opportunity.