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Public Comments on Docket 17-07-32: DEEP & PURA
Joint Proceeding to Implement the Governor's Executive Order Number 59
August 17, 2017

I would like to thank the Department of Energy & Environmental Protection (DEEP) and Public Utilities and Regulatory Authority (PURA) for conducting today's public meeting to receive comment on docket 17-07-032 which would implement Gov. Malloy's Executive Order #59.

This order, which directs a required assessment be conducted on the economic viability of the Millstone nuclear generating facilities, shows the state's interest in Millstone, but unfortunately without a commitment for action is potentially too little too late.

One only has to look around the country to see that there have already been five nuclear plants that have closed and thirteen others that have announced their closure premature to their effective permit date due to the inability to be properly compensated for the zero carbon dioxide emitting electricity that they produce.

Plants in Illinois and New York have closed or threatened closure only to receive huge subsidies at ratepayer and/or taxpayer expense to stay open. Both subsidy actions have been upheld in the courts when challenged as important strategies to preserve these assets. While these drastic measures were supported by courts as necessary for plants in similar situations as Millstone, Dominion is not asking for support anywhere near that level here in CT. They are not seeking a subsidy. They simply want a fair opportunity to participate in the state's procurement process.

Without that opportunity, Connecticut's nuclear asset now has begun a strategic assessment as to whether they will continue operating the facility - a facility which provides the equivalent of 50% of the daily power used in our state, provides jobs that earn \$110 million in annual salaries, provides employment opportunities that support our communities and pay state and local taxes, provides thousands of union jobs during refueling shutdowns, provides opportunity for hundreds of vendors across our state, generates a \$1.5 billion dollar fiscal impact here in Connecticut, and whose parent company has never asked for a subsidy to keep this plant open unlike other major manufacturers in our state.

Should Dominion decide to close the Millstone station as not being worth the risk or as an underperforming asset, as they did the nuclear plant in Green Bay, what happens then? How would the over 15 million Megawatt hours per year the plant and its employees provide be replaced over the next 5 years? In markets where existing nuclear plants have closed natural gas has doubled its market share - not renewables. Is that the direction Connecticut is interested in taking its energy policy?

We need Millstone's stable, carbon free baseload power for at least 5 more years so that we can properly plan and build a bridge to our renewable energy future.

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Connecticut already has a procurement process that we should allow nuclear to participate in. The Commissioner of DEEP and the Consumer Counsel would accept OR reject the bid based SOLELY on the best interest of the rate payer.

We need more than a study. We need action. Otherwise I fear we will watch Dominion and its employees follow the path of GE, Aetna and countless others who are leaving or have left Connecticut. The difference is that Dominion will take half of Connecticut's daily power supply and 30% of New England's with them. What will happen then?

Let's act prudently.

That being said, any study that requires a high number of assumptions to be made when crafting recommendations for action is solely dependent on such assumptions. I believe it is very important this study provide multiple models based on multiple assumptions that are as grounded in fact as possible. For example, replacement scenarios should be as realistic as possible and be based on current requirements for Class I resources, approved electric generating projects, ISO-NE capacity replacement projections and price modeling by EIA. Each of these areas would need a high/low assumption.

I encourage DEEP/PURA to complete this report and its recommendations as soon as possible as this docket will be running in concert with Dominion's strategic assessment of Millstone. There would be nothing more regrettable than DEEP/PURA recommending appropriate action to keep Millstone open after they had already started turning off the lights.

Thank you for your attention to this important issue. I believe it is crystal clear to us all that Millstone closing would devastate stable and affordable energy - making this situation one of the most important issues facing our state. It is something all sides must come together to understand and take action to prevent.