



Connecticut Fund for the Environment

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August 9, 2002

Mr. Joel Rinebold
Executive Director
Institute for Sustainable Energy
83 Windham Street
Willimantic CT 06226

Via hand-delivery

Re: Docket No. 02-04-23—Task Force / Long Island Sound Study

Dear Mr. Rinebold:

The Connecticut Fund for the Environment submits the attached document in response to your request for preliminary position papers from Long Island Sound Task Force members to summarize concerns pertaining to the above-referenced matter. Please contact or me at (203) 787-0646, ext. 106, or Curt Johnson at (203) 787-0646, ext. 111, if you have questions about this material. Thank you for your attention to this matter.

Sincerely,

Penny H. Anthopolos
CFE Staff Attorney



Connecticut Fund for the Environment

**Preliminary Position Paper of the Connecticut Fund for the Environment,
Member of the Long Island Sound Task Force**

By Curtis Johnson and Penny Anthopolos

The Connecticut Fund for the Environment (“CFE”) views the Long Island Sound Task Force as an opportunity to use sound planning to avoid, wherever possible, the very real threats that energy crossings pose to Long Island Sound, an important regional and national estuary.

In order to fulfill the mandate set by the Legislature in creating this Task Force, the Connecticut Fund for the Environment perceives that several steps must be taken: (1) to complete a thorough and comprehensive assessment identifying the most critical and important natural resources and habitats in the Sound; (2) to learn from the negative impacts to the Sound’s resources from past transmission lines across Sound; (3) to gain a genuine and reliable understanding of the energy needs of Connecticut and the region; (4) to understand the reliability, or lack thereof, of the Siting Council’s regulatory scheme in approval of energy-transmission projects in today’s changed energy market; *and perhaps most important, 5) to carefully study and make informed recommendations on the alternatives that would prevent, or at least significantly diminish, the destruction and impairment of the Sound’s natural resources, through avoiding the placement of energy-transmission projects in the Sound altogether or, failing that, through ensuring that all future energy transmission projects placed in the Sound are sited in a manner to carefully and fully avoid the Sound’s most crucial natural resources.*

The Legislature, in creating and setting forth the responsibilities of this Task Force, expressly mandated that the Task Force carefully consider alternatives to protect Long Island Sound—not merely that the Task Force review current and likely future pro-

posals, and make recommendations as to their suitability for placement in the Sound. The Task Force must consider alternatives that avoid harming the Sound. These alternatives include, among others, enhanced and effective demand-side reduction programs; the innovative and promising development of feasible and cost-effective fuel-cell technologies; clean generation of power on Long Island that would make electrical cables from Connecticut to Long Island unnecessary; and careful evaluation of the existing proposals for more traditional energy infrastructure development to meet Long Island's energy needs that avoid crossing the Sound entirely.

The Connecticut Fund for the Environment believes that more emphasis within the Task Force (and in other, truly regulatory entities) must be placed upon these technologies and proposals which could, particularly in concert with one another, meet the energy needs of Connecticut and the region.

However, a critical question that arises when determining whether such technologies would be sufficient to meet these energy needs is: What are the short- and long-term energy need of the region? An unbiased approach must be taken by the Task Force (and Working Group) to determine whether the energy benefits to Connecticut purported by Long Island Sound energy-transmission advocates are genuine. The Task Force members must honestly study and answer the question of whether the perceived, significantly increased "needs" relate primarily to ensuring energy reliability for consumers, or to increasing profits for people within the energy industry.

A genuine and significant region-wide, increased energy need does warrant aggressive, but very carefully planned, emphasis on meeting that need. However, the gradually improving vitality of our State's most fragile and unique natural resource is certainly not worth risking for any reason, particularly if alternatives exist to meet that need. At the very least, we must avoid destruction or impairment of the most vulnerable of the Sound's important natural resources.