



**DEEP/PURA Resource Assessment Re: Millstone Nuclear Power Station**  
**Comments by Louis W. Burch**  
**Citizens Campaign for the Environment**

**January 8, 2018**  
**Hartford, CT**

Commissioner Klee, Chairperson Dykes, thank you for the opportunity to offer comments on this important issue.

My name is Louis Burch and I represent Citizens Campaign for the Environment (CCE). Supported by over 80,000 members in Connecticut and New York State, CCE works to empower communities and advocate for solutions that protect public health and the natural environment. I would like to offer the following comments regarding DEEP's resource assessment of Millstone Nuclear Power Plant in Waterford, CT.

A careful review of the draft report released on Dec., 14, 2017 reveals that not only is Dominion projected to remain profitable through 2035, but the company is projected to earn more than \$100 million in annual profits over the next several years, under the facility's current arrangement with ISO-NE. These figures are not inconsistent with the findings of an MIT report that was published earlier in 2017, which indicated that Millstone nuclear remains *the single most* profitable nuclear power plant in the nation.

This report only serves to reinforce CCE's position; **Millstone power station remains in good economic health and does not require a special arrangement with the State of Connecticut in order to remain in operation.** The report indicates that, due to its current commitments, the facility would be able to close its doors no sooner than 2022, and that no immediate reliability issues would arise within the ISO system from its retirement.

Other states that have chosen to grant subsidies to their struggling nuke plants have done so only after adopting a strategy that would allow clean, renewable energy to eventually replace nuclear generation entirely. Some examples include California, which is replacing its last nuclear reactors with energy efficiency, renewable power, and energy storage. In the state of Illinois, nuclear subsidies were tied to commitments to ramp up energy efficiency, as well as wind and solar. In New York, lawmakers only agreed to support upstate nuclear plants *once the firms that operate those plants demonstrated proof of an actual financial need.*

Additionally, New York State has wisely committed itself to aggressively advancing renewable energy, and has developed a goal of providing 50% of its electricity supply from clean wind and solar power by the year 2030. Last week in Governor Cuomo's State of the State address he committed to releasing two RFPs in 2018 that will add 800 MW of offshore wind to New York's energy grid.

In conclusion, CCE agrees with the findings of DEEP's resource assessment, and strongly opposes any special deals for nuclear power under our state's energy procurement markets. Allowing Millstone to compete with up-and-coming renewable technologies like wind and solar power would unfairly force CT ratepayers to foot the bill for an antiquated, and yet highly profitable power source. It also provides Millstone with a devious unfair advantage over truly clean, renewable energy sources our state urgently needs. If CT is going to meet our proposed 30% by 2030 RPS goal, (or more appropriately, 50% by 2030, as advocated for by CCE and numerous other stakeholder groups), with truly, clean, renewable energy sources like wind and solar, Millstone must not be granted any preferential treatment in state procurement auctions.

On behalf of our members in Connecticut, we thank you for the opportunity to comment on this important process.