



141 Tremont St., Boston, MA 02111

(t) 617-902-2354 (f) 617-902-2349

www.nepga.org

Meeting our Energy and Environmental Needs Simultaneously
Legislative Position Paper
January 9, 2007

Rarely has there been such an urgent and simultaneous need to meet the dual public policy goals of producing more energy for our region and doing so in a more environmentally friendly manner than we face today. These joint energy and environmental goals *must* be pursued in a cohesive and complementary way.

The New England Power Generators Association is a trade association comprised of the 13 electric utility generating companies in New England. We literally produce the power that warms our homes and drives our economy. Our challenge is to ensure a reliable supply of electricity to the region at a reasonable price to protect the health of the state's economy and the well being and safety of its people.

Additionally, we have the challenge of guaranteeing greater system reliability while furthering efforts to reduce greenhouse gas emissions and other environmental impacts on the Commonwealth. Our industry's goals for power production today are:

- Make it Greener;
- Make it more renewable; and
- Make more of it, without having to engage in Greenfield development sites.

To meet the state's environmental goals and facilitate cleaner electrical production, the New England Power Generators Association recommends a streamlined permitting process for any energy project that addresses multiple public policy goals by meeting one of the following criteria:

- 1.) An Environmental Upgrade project proposing modification to an existing generating facility that is proposed predominantly to further compliance with 310CMR 7.29 (the Section 729 Filthy Five regulations).

Environmental Upgrade: an improvement to an existing Facility that results in a net reduction in the emission rate for any pollutant, express in terms of actual emissions in pounds or other applicable unit of measurement over a specified time period per megawatt-hour of net electrical output produced over the same time period.

- 2.) A Capacity Upgrade project that adds installed capacity at an existing generation site.

Capacity Upgrade: an improvement to an existing Facility that results in an increase in the Facility's capacity to generate electricity or an improvement at a Facility Site that results in a net increase in the Facility Site's capacity to generate electricity.

- 3.) Adding capacity as a Renewable Energy project that qualifies as such under the Commonwealth's Renewable Portfolio Standard (RPS) program.

We believe that projects that meet one of those criteria further the public policy goals of smart growth development, address global climate change, brownfields redevelopment, promote renewable power and reduce greenhouse gas emissions, warrant expedited review and processing by the state and municipal agencies.

Projects that qualify for such an expedited permitting review or siting process should have their regulatory review processes concluded in not more than one hundred and eighty (180) days following formal application.