Comments on May 16th Presentation to the SEAC

1. **P. 2 –** SB191's Advisory Council "to assist OEP in the development of a state energy strategy":
   - The competitive process that results in hiring Navigant Consulting may unhelpfully tie a future decision-making process to Navigant Consulting when another consultant may be more productive. What if, for instance, the task at hand would better be served by Rocky Mountain Institute's advice, because RMI combines energy planning with environmental concerns as two equal concerns? Or another consultant might be preferred.
   - When I looked online at Navigant Consulting's staff, I could find no expert environmentalist. Even a corporation like Shell Oil hires environmentalists.
   - Navigant's "Governance, Risk and Compliance" staff may cover answering to EPA requirements, but not really be environmental in expertise and concerns.
   - No consultancy contract should extend past this draft use. Each future need for consultancy help should search according to the need.

2. **P. 3** - "NH is not an energy island and some issues are out of the state's control." Leads into a <u>default</u> position - "...actions the state can take":
   - Actions as listed are okay, but should not be limited to these. When legislation to our east (VT) (NY) and / or our west (ME) is more favorable to environmental needs, we should by policy study it and anticipate enacting complementary legislation. VT and NY and ME all deal with similar energy v. environment problems as NH does. We should be ready to present a unified front with our neighbors where the environment is concerned. Energy will always have its big-money powers and voices; the environment needs special notice because it will be local, unmoneyed advocates speaking for the environment, easily ignored or dismissed by those catering to big-money powers / energy industry. Governors especially need to know that environment can't be traded off for jobs or cronyism's comforts.

3. **P. 4** - "Demand is steady" - this is an industry that should be helped to celebrate decreased demand. Should be incentivized to welcome decreased demand. P. 7 – Navigant's analysis includes "increasing fuel choice for all areas of the state."
   - I'm concerned that Navigant will view and promote Hydro-Quebec water power as simply another fuel choice. Navigant will not factor in the cost to the Canadian environment of this artificial power source and will necessitate its power lines north to south through NH, not factoring in that cost to the environment. "...Protecting natural, historic, and aesthetic resources and encouraging local and renewable energy resources" is <u>half</u> the charge given by SB191.

4. **P. 11** - "Fuel Choice Context" and "Fuel Choice Strategies" - "new fuel choices" would logically include Quebec-Hydro water power, yet that is destructive as a source, with methane release to the atmosphere due to flooded forests. It requires destructive transmission construction. Is this a loop-hole-y language <u>place in the DRAFT</u> that intentionally or not lets in non-environmentally positive (so are environmentally negative) power sources?

5. P. 13 "Other Things to Consider" - "Navigant and public commenters provided additional ideas to consider" followed by examples. So some discussion happened in the past and here we have a sampling of what was discussed, is one way to read this. What if Navigant, also hired to consult with New York State, provided (or provides in the future) an idea to close down Indian Point nuclear plant and replace its energy in the grid with Hydro-Quebec? Of course "other things to consider" is good critical thinking to include, but let it not mask that Navigant is already anticipating patching together

a “good deal” that is good for their credential and good for NY State, but not good for NH – because of the impact of power lines on our tourism industry. Navigant should not have a permanent place in our State Energy Strategy.

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7/24/2014