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July 25th, 2014

Meredith Hatfield, Director
NH Office of Energy and Planning
Concord, NH

Re: Draft NH Energy Strategy

On behalf of Seacoast Anti-Pollution League, I would like to submit the following comments regarding your draft NH Energy Strategy. In general, we support a strong, aggressive Strategy that emphasizes great improvements in efficiency and renewable energy development, with the goal of transitioning to a truly sustainable energy system. While the draft claims to "describe an ideal energy future for New Hampshire" and includes many good ideas and options for reducing energy use around the state and encouraging renewable energy, it lacks any sense of urgency regarding climate disruption or ending our reliance on fossil fuels and increasingly dangerous nuclear power.

As our long-time and current focus is mostly concerned with safe/clean electric power, our further comments will be limited to electricity/renewable power parts of the Strategy.

Regarding electric power goals/vision, the Strategy simply settles on the existing commitment of 25 percent renewable generation by 2025, despite the fact that we are already more than half way there - and of course that is a long way from where we need to be to adequately address climate disruption or energy security. We think the Strategy should treat the "25% by 2025" renewables goal as a starting point/minimum, not as the best we can do.

We would like the Strategy to aim for maximization of all available energy efficiency and renewable energy development opportunities, while minimizing existing obstacles to individual and utility-scale renewables development. The Strategy should also give more emphasis to climate threats as well as climate disruption prevention goals (ie., elimination of coal, phase-out of other fossil fuels) and the broader goal of energy sustainability in its "vision" section.

In the "baseline forecast" section, we urge you not assume that the Seabrook nuclear plant gets re-licensed and continues operation through 2033, or at least to model the situation if it doesn't – as required by SB 191, section I(b). Current concerns over concrete degradation in the plant foundations as well as nuclear power electricity market instability could prove problematic for Seabrook's future viability beyond or even prior to 2030. Also, recent actions by the NH Commission on Decommissioning Seabrook do not reflect a re-licensing assumption, so neither should OEP.

Similarly, you should not just assume that the State's coal plants will continue to operate throughout this period. Divestment/PUC action (as directed by HB 1602) could change that, which should be pointed out somewhere, or at least be modeled in the Strategy – again, as required by SB 191.

In particular, we think the Strategy should give more emphasis to offshore wind as a significant potential power source. The draft text in this regard provides a concise if somewhat discouraging summary of the current state of affairs with offshore wind, but it is a far cry from conclusions of the 2009 Maine Ocean Energy Task Force report – that their state could feasibly construct 5000 MW of offshore wind power capacity by 2030. Similarly, Massachusetts has a goal of 2000 MW of overall wind by 2020 – why shouldn't New Hampshire set a commensurate goal to aim for?

More specifically, we think the Strategy should not limit its analysis to the "Cape Wind" experience – a better example may be the Block Island 30 MW Project off RI, due to be installed by 2015, which hasn't encountered the stumbling blocks that Cape Wind has. It's worth mentioning too that a 30 MW offshore floating platform wind project in Oregon recently got DOE funding (while Maine didn't), and is due to be up and running by 2017. Be sure also to update your text to include the passage of the HB 1312 offshore wind/ocean technology study bill, and follow-up to include the results of that study in required updates to the Strategy.

Additionally, the short length of our coastline is too often used to dismiss New Hampshire's potential to take advantage of offshore resources. The more relevant figure is the offshore territory – within NH waters as well as federal waters in proximity to NH-based facilities and grid connections. We trust the legislative study committee report will flesh this out in more detail, but it's worth noting our deepwater port facilities and convenient grid access in Portsmouth and Seabrook.

Relatedly, it would be worth mentioning several plans for offshore power lines in/around NH (in addition – or in competition – to Northern Pass) recently presented to NE ISO, which could positively affect offshore wind development, and make "high cost of...transmission infrastructure" (pg. 62) less of an issue. Again, "existing and proposed electricity... transmission facilities" are required to be included in the Strategy by HB 191, section I.(b).

Graphs/charts on potential impacts of suggested changes on power generation percentages and future CO2 emissions would also be most helpful here. After all, a "vision" should involve visuals – none along these lines were evident in the draft Strategy. As another example, where are we *now* with renewables use? – a pie chart would help. People are going to look at graphs more than the text, and the Strategy would benefit from an overall perspective incorporated in several graphics.

Overall, we want a strategy that gets us where we need to be in 10-20 years and doesn't settle for existing limited goals. In the face of continued denial and manipulation of public opinion by the fossil fuel industry and their supporters, the Strategy should be forthright about the threat of climate disruption and benefits of addressing it, as well as the challenges and opportunities we face in building a sustainable energy system for the Granite State.

Please let me know if you have any questions or comments on these suggestions. We look forward to final publication of the Strategy.

Sincerely,

Doug Bogen
Executive Director
Seacoast Anti-Pollution League