



CONSERVATION LAW FOUNDATION

August 15, 2008

Robert Sullivan, President
Brockton City Council
City Hall
45 School Street
Brockton, MA 02302

Re: Brockton Power Plant Project

Dear Council President Sullivan:

The Conservation Law Foundation (CLF) is concerned that certain representations made by power plant developer Advanced Power North America may convey the misimpression that CLF endorses its proposal to develop a 350 megawatt (MW) power plant in Brockton ("Brockton Power"). We have *not* endorsed this project, and want to make this clear in advance of the project proponent's presentation to Brockton City Council on August 18.

CLF is a public interest advocacy organization that works to solve the environmental problems that threaten the people, natural resources and communities of New England. Founded in 1966, CLF is a nonprofit, member-supported organization. CLF promotes clean, renewable and efficient energy production in New England, and advocates in support of responsible clean energy development as a critical means of addressing the global climate change crisis and its potentially devastating impacts on New England.

According to documents circulated by Brockton Power: "Brockton Clean Energy is the same type of facility [as the one] (*sic*) installed at the world famous Eco-Park in Londonderry, NH, which abuts some very strict environmentalists, including Stonyfield Farms and hundreds of acres of conservation land. Eco-Park was so clean that it was endorsed by the Conservation Law Foundation (CLF)." This representation – like Brockton Power's suggestion that "it will make no impact at all," is grossly misleading. As discussed briefly below, Brockton Power stretches the truth in suggesting that its project is the "same" as the AES Londonderry facility. Moreover, the extent to which Brockton Power implies any CLF endorsement of its Brockton project is inaccurate and regrettable.

It is true that CLF Ventures – CLF's non-profit business and financial strategies affiliate – supported the development of the AES Granite Ridge Energy Facility in Londonderry, New Hampshire when it was proposed and developed nearly a decade ago. At the time, the AES Londonderry natural-gas fired plant (now known simply as "Granite Ridge") was the cleanest,

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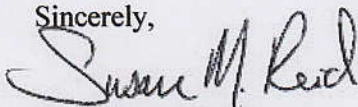
most technologically advanced power plant in New England history. Indeed, some of the features that made the Londonderry project an important precedent-setting effort, like the air pollution emissions controls and the use of effluent from a wastewater treatment plant, are now standard features found in many power plant projects today.

It is important to note that the AES Londonderry facility is a natural-gas fired plant that – unlike the Brockton Power project – *did not include any co-firing with diesel fuel*. Although the Londonderry plant was situated near conservation land (as Brockton Power points out), the plant itself is sited on a gravel pit in an industrial park adjacent to airport runways. Further, the developers of the Londonderry facility made extensive commitments to work with the local community, preserve significant acreage of conservation land, and address citizen concerns about noise, traffic, aesthetics and other issues. The AES Londonderry facility was unprecedented at the time it was developed, in terms of its environmentally responsible and community-sensitive approach to power generation. The same cannot be said with respect to Brockton Power.

Every power plant project needs to be reviewed in the context of its particular site, the impacts it is expected to have on the local community and natural resources, its emissions and its comparative merit vis-à-vis alternatives. With the recent creation of a new regional market that puts energy conservation on the same footing as new power generation, and with powerful state-mandated incentives to promote renewable energy, energy efficiency and conservation, the bar that must be cleared today is far higher than it was back when the Londonderry facility was being developed. It is in this current context – and based on the facts rather than misleading suggestions – that the Brockton Power project should be reviewed.

Please do not hesitate to contact me at (617) 850-1740 or via email at sreid@clf.org if you have any questions or would like to discuss the foregoing.

Sincerely,



Susan M. Reid, Esq.

Director, MA Clean Energy & Climate Change Initiative

cc: Brockton City Clerk
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