

*The following comments were not submitted in electronic form and were retyped by RAP. It is our belief that they have not been changed any way*

## **Natural Resources Defense Council**

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### **Natural Resource Defense Council**

#### **Uniform Disclosure Standards for New England**

##### **(for discussion purposes)**

This proposal offers three modifications to the disclosure mechanism proposed in the recent Regulatory Assistance Project (RAP) report in an effort to address the issues associated with the sale of power that is imported into New England or generated in a way that adversely affects the environment other than through air emissions.

1. Differentiation of Imported Power. Retail marketers should be required to disclose the environmental characteristics of all power sold to customers in New England, regardless of whether or not all or some portion of that power is purchased from generating companies located outside of NEPOOL. Retail marketers should base such disclosures on the average emissions rates and fuel mixes of the companies which generate the power the marketers are retailing. For reliability purposes, the independent system operator (ISO) already must determine the control area from which any power imported into NEPOOL is sold. The ISO has the capability to provide the information necessary to verify the sale of power into New England from specific generating companies in the event that retail marketers are required to provide such information.

2. Additional Information to be Disclosed. States should develop procedures to regularly review the availability of information regarding adverse environmental effects of power generation other than air emissions, including the generation of nuclear and other wastes and the degradation of land and water resources. Retail marketers should be required to disclose such information as it become readily available.

3. Supplemental Information Regarding Environmental Effects of Different Types of Generation. In addition to the information disclosed in label form on each customer's bill, retail marketers should be required to provide their customers with more detailed information about the environmental effects of different types of power generation on a periodic basis. In order to ensure objectivity, it may be appropriate for NESCAUM or an independent advisory panel to prepare this supplemental material.