

Comments from Minnesotans for an Energy-Efficient Economy (ME3)

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ME3 has reviewed the two new versions of the generic brochure for environmental disclosure, which were developed by the Department of Commerce with input from several utilities' staff.

For simplicity's sake, in our comments we will refer to the Minnesota Public Utilities Commission's Order Requiring Disclosure and Compliance Filing, issued October 2, 2001 (Docket No. E,G-999/CI-00-1343), as the "Commission's Order."

We have a number of specific suggestions for improving the brochure. We will begin by describing two instances in which neither brochure version reflects the directives of the Commission, and offer specific language intended to ensure that the information disclosure complies with the Commission's Order.

Conservation

The Commission's Order specifies that "each utility should address the role of conservation...in the brochure, including the amount of electricity conserved and the amount of air emissions avoided." No suggested format for this conservation information has yet been provided. Although a placeholder has been set aside "for utilities to promote their CIP programs" the recommended brochure format should specify that this conservation information must include the amount of electricity conserved and the amount of air emissions avoided, at a minimum.

Nuclear Waste

The Commission's Order directed "(N)uclear waste not be included in the air emissions bar chart, but be covered in a separate component of the brochure." We recommend that the nuclear waste disclosure language read as follows:

In the 12 months ending <insert date>, <insert name of utility company> produced <insert number of pounds> pounds of radioactive waste in generating electricity to serve its customers.

COMMENTS ON VERSIONS 1 AND 2

Our comments will focus on new language that would improve Version 2 of the brochure.

Pie Chart

The phrase “Certain Purchases” has no clearly defined meaning, and will likely confuse consumers. The suggested footnote does not really help clear up that confusion. It appears that the recommendation from the Technical Group regarding reporting of emissions from purchased power (i.e. where the generation source is not known, the regional averages for emissions should be used) should apply to fuel sources as well, such that when purchased power is of unknown origin, it be allocated to fuel source categories in the pie chart according to the regional fuel source mix.

Cost and Reliability Table

As the Technical Group has recommended that the table in Version 2 be replaced by a new proposal to convey relative generation costs, we will defer our comments until we are able to see a mock-up of that new component of the information disclosure.

Environmental Effects, including Text on statewide, coal-fired and nuclear power plants.

In May 2001, the Joint Commentors (the Department of Commerce, ME3, and the Minnesota Pollution Control Agency) recommended that, since a purpose of the environmental disclosure is to reveal important environmental effects of a consumer’s energy use, the information disclosure should explicitly draw the links between the predominant fuel sources used to generate Minnesotan’s electricity and their emissions and wastes, and the major environmental and public health impacts of that pollution. By removing the information on statewide, coal-fired and nuclear power plants and the descriptions of the links between fuel sources and air emissions contained in the Joint Commentors’ filings, Version 2 of the brochure fails to achieve the purpose of describing the environmental effects of consumers’ energy use. The brochure provides consumers with no information about the links between emissions and environmental effects.

Emission by Fuel chart

We recommend that emissions be reported in pounds per 1,000 kWh (as is the case in many other states that require emissions disclosure), and that instead of using the notation “#”, “pounds” be spelled out.

The text located below the emissions by fuel chart would be more accurate if the current nuclear energy text were replaced with the following:

Nuclear energy produces radioactive air emissions, radioactive water discharges, and both high- and low-level nuclear waste. Radioactive nuclear waste is toxic for thousands of years, requiring stringent handling, storage, and security procedures.