



October 11, 2018

VIA ELECTRONIC MAIL

Governor's Council on Climate Change
Email: deep.climatechange@ct.gov

RE: Comments of the Sierra Club to the Governor's Council on Climate Change

Dear Members of the Governor's Council on Climate Change:

On behalf of the Sierra Club and our more than 36,000 members and supporters in Connecticut, thank you for the opportunity to provide comments regarding the September 20th meeting of the Governor's Council on Climate Change (GC3). The Sierra Club looks forward to the opportunity to review and comment on the GC3's draft report on reducing greenhouse gas (GHG) emissions in Connecticut to meet the State's 2030 goals once that is released. Based on the information presented at the September 20th meeting, however, we offer the following high level preliminary recommendations.

First, we urge the GC3 to be specific and quantitative in its recommendations in the draft report. The GC3 has already developed extensive modeling of sector-specific emission reductions that would put the State on track to achieve its 2030 and 2050 climate goals.¹ We urge the GC3 to incorporate the quantitative results of that analysis into the recommendations in its draft report. For example, with regard to renewable thermal technologies (RTTs), in addition to identifying as a priority to "[d]evelop a comprehensive plan to deploy renewable thermal technologies across residential, commercial, and industrial customers,"² the GC3 should also incorporate the specific targets for residential and commercial sector deployment of RTTs identified in its modeling.³ Likewise, with regard to beneficial electrification of transportation, the report should go beyond recommending that Connecticut "[i]mplement key actions identified in the Multi-State ZEV Action Plan and the CT EV Roadmap"⁴ and offer quantitative recommendations for what that looks like in terms of light-duty, medium-duty and heavy-duty vehicles electrified by 2030. This is particularly important because the Multi-State ZEV Action Plan is focused on the very near term (2018-2021) and is limited to strategies to accelerate deployment of light-duty vehicles⁵ and the CT EV Roadmap does not yet exist and therefore

¹ Conn. Dept. of Energy & Env'tl. Protection, RTT Conference Slides (June 19, 2018), at Slide 2 (identifying GHG mitigation wedges for consistent with a 45 percent reduction in GHG emissions by 2030 and an 80 percent reduction in GHG emissions by 2050); *see also* Conn. Dept. of Energy & Env'tl. Protection, GC3 Meeting Slides (Feb. 26, 2018), at Slide 17 (identifying zero emission vehicles needed for a 45 percent GHG reduction by 2030), available at http://www.ct.gov/deep/cwp/view.asp?a=4423&Q=568878&deepNav_GID=2121.

² Conn. Dept. of Energy & Env'tl. Protection, GC3 Meeting Slides (Sept. 20, 2018), at Slide 10.

³ *See, e.g.*, Conn. Dept. of Energy & Env'tl. Protection, RTT Conference Slides (June 19, 2018), at Slide 3.

⁴ Conn. Dept. of Energy & Env'tl. Protection, GC3 Meeting Slides (Sept. 20, 2018), at Slide 8.

⁵ *See* ZEV Task Force, Multi-State Action ZEV Action Plan 2018-2021 at pages 10-33.

currently contains no key actions. In addition to identifying specific, quantitative targets, we urge the GC3 to clarify the state agencies and entities that will be required to achieve these targets.

Second, we support the identified priority to ensure sustainable funding for transportation electrification and transit infrastructure by, among other things, a carbon fee or cap and invest program,⁶ but believe additional criteria are critical to the success of such a market-based approach. In particular, any fee or cap should be calibrated to promote meaningful reductions in GHG emissions from the transportation sector consistent with the GC3 modeling of reductions needed achieve Connecticut's climate goals. In addition, revenues should be invested in a manner that both achieves further emission reductions from the transportation sector and also promotes equitable outcomes, including directing transportation opportunities and air pollution benefits toward overburdened and underserved communities.

Third, we support the identified strategy of developing price signals, incentives, and financing to maintain and accelerate the adoption of RTTs,⁷ and urge the GC3 to further clarify that access to RTTs should be accelerated for switching not only from resistance heat to these technologies, but also switching from fuel oil and gas. As noted in the 2018 Comprehensive Energy Strategy, a recent study by the Cadmus Group found ductless air-source heat pumps are routinely cost-effective in single-family homes in Massachusetts and Rhode Island, which as the CES notes "have climates and energy prices comparable to Connecticut's."⁸ The Cadmus Group found that air-source heat pumps were always more cost-effective than both propane and electric-resistance heating and ones optimized for cold climate were most cost-effective than oil heating except during periods of extreme cold.⁹ It is critical that incentives for switching to heat pumps be extended to customers engaging in fuel switching as well as those simply using electricity more efficiently. By the same token, given the need to rapidly electrify residential and commercial heating and cooling to meet climate goals, it is critical that Connecticut not worsen the problem by incentivizing conversions to gas from electric resistance heating or other fuels.

Thank you for your consideration.

Respectfully submitted,



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Beyond Coal Campaign
Sierra Club

⁶ Conn. Dept. of Energy & Env'tl. Protection, GC3 Meeting Slides (Sept. 20, 2018), at Slide 9.

⁷ *Id.* at Slide 10.

⁸ 2018 CES at 27 (citing The Cadmus Group, Inc., Ductless Mini-Split Heat Pump Impact Evaluation (Dec. 2016), available at <http://ma-eeac.org/wordpress/wp-content/uploads/Ductless-Mini-Split-Heat-Pump-Impact-Evaluation.pdf>)

⁹ *Id.*