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VIA ELECTRONIC MAIL

Governor's Council on Climate Change

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RE: Draft Greenhouse Gas Reduction Recommendations of 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 11,000 members and 30,000 supporters in Connecticut, thank you for the opportunity to provide comments on the draft greenhouse gas reduction recommendations of the Governor's Council on Climate Change (GC3).

Acting to address climate change by ending fossil fuel dependence and transitioning to clean, renewable energy, transportation and home heating has taken on new urgency in 2018 as recent reports from the U.N. Intergovernmental Panel on Climate Change and the National Climate Assessment from the U.S. Global Change Research Program have made clear that swift action is necessary to avoid climate catastrophe.

While the Sierra Club supports many of the recommendations in this report, these comments are limited to recommendations that are key priorities, or where there are further suggestions, or clarifications are sought.

Cross Sector

There is a growing understanding that pricing carbon emissions can help control carbon pollution and the environmental harm it is causing. Ideally a carbon price would happen on the national level, but in the absence of federal leadership, individual states or multi-state coalitions can take action. To ensure that a carbon price has the desired result of reducing carbon, we recommend that a carbon price proposal must identify specific targets for CO2 reductions, use revenue to invest in clean and renewable technologies to replace carbon intensive technologies, and include measures to address impacts on low-income residents and communities

Electric Sector

It is critical that a transparent and consistent compensation structure be put in place to maintain at least the historical annual average of 40 to 90 megawatts of residential behind-the-meter renewable energy resources (pg 24, item 2). There currently exists uncertainty among customers and project developers that must be resolved to ensure a continued expansion of behind-the-meter projects. Additionally, residential behind-the-meter projects should not be limited to the historical average of 40 to 90 megawatts.

In the development of a long-term zero-carbon strategy for the state (pg 24, item 4), Connecticut should clearly define zero-carbon generation in a manner that avoids the possibility of encouraging the development of new projects that have zero carbon emissions but create other toxic pollutants and are neither clean or renewable. As offshore wind has the potential to become a key component of Connecticut's RPS, identifying minimum off-shore wind targets, like those for distributed solar and shared solar (pg 24, items 3 and 5), is suggested to increase the 200 megawatts of offshore wind currently committed. Our neighboring states are far ahead of us. New York has a goal of 2,400

megawatts of offshore wind by 2030 and has committed to 800 megawatts to date; Massachusetts's goal is 1,600 megawatts by 2027 of which 800 has been committed. Rhode Island has committed to 400 megawatts to date.

Regarding revisions to the RPS (pgs 23 and 24 item 1), while energy storage will be an important component of our future energy system, the Sierra Club objects to energy storage being considered a Class I renewable regardless of the source.

Transportation Sector

A multi-state cap-and-invest program (pg 32, item 1) is a critical step to create a regional program that cuts emissions from transportation while generating new funds for clean transportation investments which should include dedicated funding for projects that will improve transportation for disadvantaged communities. Such a multi-state cap-and-invest program can be done through the Transportation and Climate Initiative (TCI) which Connecticut, along with 10 other states in our region, participates. TCI states have joined together to study this issue, held listening sessions on how this multi-state program could work, and in November 2018, issued a summary report. This groundwork makes this item immediately actionable.

The Sierra Club also supports maintaining Corporate Average Fuel Economy and GHG emission standards and to California low-emissions and zero-emission vehicle requirements (pg 26, items 1 & 2). Upholding these standards has a high impact and can be swiftly put into place. Recommendations on price signals, charging network and the state fleet (page 28 items 1, 2, 3) are all important steps to ensure fossil fuel burning vehicles are replaced with zero emission alternatives.

Connecticut is behind other states in the region in our utilities' role in accelerating the adoption of electric vehicles.

- In Massachusetts, National Grid has been approved for 1,200 public Level 2 charging ports and 80 direct current fast charging ports and has now submitted a new \$166.5 million "Phase II" transportation electrification proposal in its latest rate case that targets a broader range of market segments and includes innovative load management strategies.
- The Rhode Island Public Utilities Commission has formally approved the amended settlement in National Grid's rate case and Power Sector Transformation docket that included a \$10 million to promote deployment EV charging stations, provide EV-related education, and incentivize off-peak vehicle charging.
- The New York Public Service Commission accepted comment on a robust set of questions regarding utilities' place in advancing transportation electrification and hosted a working group meeting on rate design principles to be applied to EV charging stations, which will inform a soon-to-be-released whitepaper with concrete recommendations to PSC action moving forward. The PSC is also considering a jointly filed proposal to address near-term concerns about the barrier current demand charges pose to the competitive siting of direct current fast chargers.
- In Maryland, the Public Service Commission held a second set of legislative-style hearings and solicited two additional rounds of comments on the \$104 million joint proposal from four of Maryland's distribution utilities to provide rebates and other incentives for installation of more than 22,000 Level 2 and DC fast charging stations at a range of residential, non-residential (multi-unit dwellings, workplaces, fleets), and public settings, EV education and outreach, and incentives for off-peak charging. The Maryland commission is now poised to issue a final order in that docket.
- In Vermont, the Public Utilities Commission held its workshop to address barriers to the widespread deployment of EV charging stations and widespread ownership of EVs and strategies for removing these barriers, and received stakeholder comments following the workshop.
- PSEG in New Jersey has filed a \$261 million EV proposal that would support the installation of 40,000 charging stations (including residential smart charging, mixed use charging, and public fast charging) in its service territory.

We support clarifying the role and expectations for utilities in helping to advance deployment of EV charging infrastructure in Connecticut.

To facilitate the adoption of EVs and reduce the costs associated with retrofitting existing buildings to accommodate EV charging, we suggest adding building codes that require new construction to be “EV ready” to the recommendations in the report.

Building Sector

Energy efficiency (pg 34 item 1) must be a top priority. The energy and cost savings realized through energy efficiency programs is not only essential to reduce greenhouse gas emissions, they also allow for the electrification of other sectors, as recommended in this report, without needing to generate more power.

Another top priority must be to replace fossil fuel thermal loads with renewable thermal technologies (pg 36-38). Renewable thermal technologies (RTTs) are also referenced in the “Energy Sector” of the report. In order to significantly increase RTTs and realize the greenhouse gas emission reductions inherent in this technology, RTT conversions should be targeted to all customers.

This draft report does not include any recommendations for methane reductions. As written, the recommendations to reduce fossil fuel usage are focused on adopting new technologies; we strongly recommend also adding goals that will decrease and eventually end the need for fossil fuels, specifically methane gas, in the following areas:

- End ratepayer subsidies for transitioning customers from oil to gas; 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. EnergizeCT’s website states a goal of converting 300,000 customers to natural gas.
- Stop expansion of pipelines and construction of new, larger compressor stations. Continued expansion of our fossil fuel infrastructure is in direct opposition to our greenhouse gas emission reduction goals.

If successful, implementation of the recommendations in this report will completely transform Connecticut’s energy, transportation and building sectors. This kind of transformation has the potential to further exacerbate inequity in our state. To ensure that low-income communities and restricted-income residents are not left out as clean, renewable technologies are implemented we suggest more intentional and concrete goals and strategies beyond programs already in place be developed about equity and access.

Thank you for your consideration.

Respectfully submitted,
Samantha Dynowski
State Director