



September 29, 2016

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 its more than 8,000 members in Connecticut, thank you for the opportunity to provide comments regarding the information presented at your September 8, 2016 meeting. We appreciate the Governor's Council on Climate Change's (GC3) willingness to model actions to achieve a 55% reduction in climate-disrupting pollution by 2030 on the trajectory to 80% by 2050, as well as the 35% and 45% targets. We also encourage the GC3 to model the benefits of each of those interim scenarios, per our comments to the Analysis, Data, and Metrics working group on August 17th, 2016. In addition the Sierra Club offers the following comments on the September 8th presentation and discussion.

1) GC3's data shows a need to increase the state's Renewable Portfolio Standard now, waiting until 2025 would be damaging for consumers and the climate

The data presented on September 8th continues to underscore the importance of clean, renewable electricity for achieving Connecticut's goals. Each scenario requires nearly 100% carbon-free electricity by 2050, rapidly replacing gas with at least 75% renewable energy by that year. Since Connecticut's current Class 1 Renewable Portfolio Standard ("RPS") plateaus at 20% by 2020, the state will need to act expeditiously to reach that target in the most cost effective manner. Waiting until 2025 to increase renewable electricity, which all of the scenarios presented to the GC3 on September 8th do, would cost ratepayers significantly more and make it nearly impossible for the state to achieve the interim and long term climate goals. With the production and investment tax credits set to phase down and ultimately expire, sending a clear signal to developers by increasing renewable energy requirements and purchasing energy from additional wind and solar resources within the state and region on long term contracts as quickly as possible will provide maximum benefit to all Connecticut residents. Failing to procure clean electricity in this least cost manner would force more expensive and challenging investments in other sectors, as the modeling demonstrates.

Other Northeast states are rapidly decarbonizing their electric sectors by increasing renewable generation mandates. Last month, the New York Public Service Commission finalized a Clean Energy Standard that will require that 50 percent of all electricity used in New

York State by 2030 will be from renewable energy sources.¹ Recently, legislatures in both Rhode Island and the District of Columbia approved substantial extensions and increases to existing renewable portfolio standards. The Rhode Island RPS will now extend through 2035 and require that 40 percent of Rhode Island's electricity come from renewable energy sources in that year,² and the District of Columbia will now require that 50 percent of its generation come from renewable sources by 2032.³ We urge Connecticut to follow the example of these peer states by extending and significantly increasing its own RPS.

2) Connecticut must encourage auto dealers and consumers to achieve electric vehicle sales targets

As repeatedly demonstrated in the modeling, electric vehicles are responsible for some of the largest reductions in pollution. To stay on track to hit long term goals at least one third of the light duty vehicles on the road must be powered by clean electricity by 2030, necessitating at least a thirty-fold increase in annual sales. Given the finite nature of the funding source for the recent allocation, a long term funding commitment to the CHEAPR purchase incentive for electric vehicles and significantly increased deployment of electric vehicle charging infrastructure, including by electric utilities, would help give consumers the confidence they need to purchase more electric vehicles. The state could help the CHEAPR program go even further by instituting a sliding income-based scale for the value of the incentive, as California has done.⁴

Fortunately, consumers are interested in and can utilize electric vehicles. According to a recent survey by the Union of Concerned Scientists, thirty-five percent of Northeasterners are likely to consider an electric vehicle for their next purchase, with nearly double that number supportive of automakers offering more electric options.⁵ Therefore it's important that automakers play more of a role in developing Connecticut's EV portfolio, making a much larger number of EVs available to dealerships, who in turn need to increase the number of EVs they secure from automakers and display prominently on their lots.⁶ We appreciate Connecticut's participation in the California Air Resources Board's midterm review of its Zero Emission Vehicle regulation⁷, particularly in regards to advocating for an end to the "travel provision" which allows automakers to comply without offering electric vehicles in the Northeast. Ending that loophole should go a long way to meeting Connecticut's targets, but more needs to be done.

¹ See Order Adopting a Clean Energy Standard, PSC Case No. 15-E-0302 (Aug. 1, 2016).

² See S.B. No. 2185 SUB A, available at

<http://webserver.rilin.state.ri.us/BillText/BillText16/SenateText16/S2185A.pdf>. The bill was signed by Governor Raimondo on June 27, 2016. See <http://status.rilin.state.ri.us/> (providing bill status).

³ See B21-0650, available at <http://lirms.dccouncil.us/Legislation/B21-0650?FromSearchResults=true>.

⁴ See Income Eligibility for the CA Clean Vehicle Rebate at <https://cleanvehiclerebate.org/eng/income-eligibility>

⁵ See Union of Concerned Scientists Survey at <http://www.ucsusa.org/clean-vehicles/electric-vehicles/northeast-electric-cars#.V-06LfrLIU>

⁶ See REV UP EVs: Multi-State Study of the Electric Vehicle Shopping Experience, Sierra Club (August 2016), available at https://www.sierraclub.org/sites/www.sierraclub.org/files/uploads-wysiwig/1371%20Rev%20Up%20EVs%20Report_09_web%20FINAL.pdf

⁷ See July 20th letter to CARB at <http://www.mass.gov/eea/docs/ma-zero-emission-vehicle-commission-and-mass-drive-clean-campaign/meetings/attachment-2-massdep-letter-to-carb.pdf>

3) A new program is necessary to install nearly 25,000 heat pumps annually through 2050

The 2013 Comprehensive Energy Strategy (CES) included a push for converting oil heating customers to gas⁸. The data presented to the GC3 shows that instead the focus needs to be on transitioning both oil and gas heating to clean electricity through the installation of high efficiency heat pumps. According to the modeling, an average of nearly 25,000 efficient heat pumps needs to be installed annually through 2050. Therefore the forthcoming update to the CES should recommend ending any additional incentives for converting heating to gas and instead spur new programs from the state's electric companies to support deployment of the latest heat pump, which will deliver considerable savings for customers⁹.

4) Spending any additional money on fossil fuel infrastructure would lead to stranded assets at ratepayer and taxpayer expense

Finally, one theme that emerges clearly from the modeling conducted by the GC3 to date is that, given the magnitude of the required reductions, Connecticut should not be investing its limited resources in technologies that are incapable of getting the State to its long-term goals. In particular, the Sierra Club cautions against further investments in natural gas and related infrastructure—either as a generation fuel or as a replacement for oil for home heating—based on gas's significant direct and, more importantly, lifecycle greenhouse gas emissions. For both electric generation and home heating, there are technologies available today—utility scale and distributed renewable generation and electric heat pumps—that fulfill the same functions and enable Connecticut to leapfrog fossil fuels entirely.

Respectfully submitted,

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⁸ See 2013 Comprehensive Energy Strategy for Connecticut, February 2013, available at http://www.ct.gov/deep/lib/deep/energy/cep/2013_ces_final.pdf

⁹ <http://www.energizect.com/your-home/solutions-list/ductless-split-heat-pump-rebates>