



July 7, 2016

**VIA ELECTRONIC MAIL**

Governor's Council on Climate Change  
Email: [deep.climatechange@ct.gov](mailto: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 June 16, 2016 meeting. As expressed in prior comments, we appreciate the work of the Governor's Council on Climate Change (GC3) and the analysis you have undertaken to understand the changes Connecticut must begin to implement now in order to achieve its long-term climate goals.

As the reference case modeling presented on June 16<sup>th</sup> demonstrates, none of the sensitivities analyzed puts Connecticut on track to achieve its 80% by 2050 climate goal. In all scenarios, significant additional measures are required between now and 2030 to put the State on even a minimum trajectory to hit its 2050 target. Moreover, Connecticut's prior commitment to a 2030 marker range of "at least 35% to 45% percent" below 1990 levels, embodied in the New England Governors and Eastern Canadian Premiers' (NEG/ECP) Resolution 39-1, requires even larger emission reductions during this period.<sup>1</sup> As we previously commented in March, we urge the GC3 to model these 35% and 45% reductions from 1990 levels by 2030, as well as a third scenario in which economy-wide greenhouse gas emissions drop by 55% by 2030.<sup>2</sup> Given the severity of the climate crisis, no rate of greenhouse gas (GHG) reductions is too fast, and it is important to develop an understanding the benefits and implications of accelerating the necessary emission reductions.

The Sierra Club strongly supports all of the "key transitions" identified in the Council's June 16<sup>th</sup> presentation: (1) increasing efficiency and conservation across all energy use sectors; (2) electrifying transportation and heating/cooling in buildings; (3) decarbonizing electricity; and (4) decarbonizing fuels. We look forward to working with the Council and relevant Connecticut agencies on accelerating each of these transitions, and have provided concrete suggestions to this end in prior comments to the GC3.<sup>3</sup>

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<sup>1</sup> The modeling presented on June 16<sup>th</sup> indicates that a linear reduction to 80% by 2050 from a 2001 baseline beginning in 2020 creates a 2030 GHG Guide of 29.5 MMT CO<sub>2</sub>e in 2030, or 36% below 2001 levels. Since 2001 emissions levels were substantially higher than 1990 levels, a 35-45% reduction from 1990 levels by 2030 – consistent with Resolution 39-1 – would necessitate reducing emissions even faster over the next decade and a half.

<sup>2</sup> Comments of the Sierra Club to the ADM Working Group (Mar. 31, 2016), at 2.

<sup>3</sup> *E.g., id.*; see also May 26, 2016 Comments of the Sierra Club to the GC3.

In the near term, we encourage Connecticut to follow a number of its peers in the region by extending and significantly increasing its renewable portfolio standard (RPS). Other Northeast states are rapidly decarbonizing their electric sectors by increasing renewable generation mandates. In January 2016, New York moved forward with 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.<sup>4</sup> The New York Public Service Commission is scheduled to finalize that standard this summer. Last month, 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,<sup>5</sup> and the District of Columbia will now require that 50 percent of its generation come from renewable sources by 2032.<sup>6</sup> Similarly, the Massachusetts Senate has unanimously passed a bill that would double the rate of increase of the Massachusetts RPS from 1 percent to 2 percent annually.<sup>7</sup> We urge Connecticut to follow the example of these peer states by extending and significantly increasing its own RPS.

With regard to transportation electrification, we believe it is highly important that Connecticut act quickly to accelerate the buildout of EVs and EV charging infrastructure and to make financing of EV purchase rebates more robust, secure and reliable. Regarding EV buildout, Connecticut should seek to electrify both its private and public vehicle fleets, including zero-emission buses and municipal vehicles. To this end, we appreciate that Connecticut took a helpful step last month when it announced that \$1 million of merger funding was being allocated to rebates under the Connecticut Hydrogen and Electric Automobile Purchase Rebate (CHEAPR) program.<sup>8</sup> Establishing rebate programs, EV education, and zero-emission public transit bus options for disadvantaged communities is also essential, as these communities are disproportionately impacted by air pollution and often lack sufficient transportation options. With respect to advancing EV charging infrastructure, especially in underserved areas and areas where the market is falling far short, such as in multi-unit dwellings and workplaces, Connecticut should follow the lead taken by other states, including California, and encourage PURA to issue a request for utility proposals to accelerate the installation of chargers while lowering rates and building a competitive third-party charging industry.

Given the finite nature of the funding source for the recent allocation, in the longer term, in order to provide funding certainty for the CHEAPR program, as well as for Connecticut's charging infrastructure rebate program,<sup>9</sup> Connecticut should coordinate with its Transportation

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<sup>4</sup> See Staff White Paper on Clean Energy Standard, PSC Case No. 15-E-0302 (Jan. 25, 2016).

<sup>5</sup> 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).

<sup>6</sup> See B21-0650, available at <http://lims.dccouncil.us/Legislation/B21-0650?FromSearchResults=true>.

<sup>7</sup> See Bill S.2372, available at <https://malegislature.gov/Bills/189/Senate/S2372>.

<sup>8</sup> See [http://www.ct.gov/deep/cwp/view.asp?a=2684&q=534784&deepNav\\_GID=1619](http://www.ct.gov/deep/cwp/view.asp?a=2684&q=534784&deepNav_GID=1619).

<sup>9</sup> This program provides up to \$10,000 per installation of publicly available EV charging stations. Multi-State ZEV Task Force, State Initiatives (Aug. 11, 6:30pm), available at: <http://www.zevstates.us/state-initiatives/>; see also Dep't of Energy and Environmental Protection, EVConnecticut (Aug. 10, 2015), available at: [http://www.ct.gov/deep/cwp/view.asp?a=2684&q=525224&deepNav\\_GID=1619](http://www.ct.gov/deep/cwp/view.asp?a=2684&q=525224&deepNav_GID=1619).

Climate Initiative regional partners, DEEP, and the Connecticut state legislature to establish a guaranteed and long-term funding source for these rebates that both reduces pollution and supports infrastructure as gas tax revenues decline. The GC3 should also ensure that transportation electrification continues to be a key topic in upcoming stakeholder events and should work with DEEP and PURA to collect and incorporate feedback from a broad variety of stakeholders on furthering long-term EV adoption in the State.

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,



Joshua Berman  
Staff Attorney  
Sierra Club

Mark Kresowik  
Eastern Region Deputy Director  
Beyond Coal Campaign  
Sierra Club

Martin Mador  
Legislative Chair  
Connecticut Chapter  
Sierra Club

Gina Coplon-Newfield  
National Director of Electric Vehicles Initiative  
Sierra Club