



December 12, 2022

2022 COMPREHENSIVE ENERGY STRATEGY

SECTION 16A-3D OF THE CONNECTICUT GENERAL STATUTES

NOTICE OF WRITTEN COMMENT OPPORTUNITIES

Under section 16a-3d of the Connecticut General Statutes, the Department of Energy and Environmental Protection (DEEP) is charged with preparing a Comprehensive Energy Strategy (CES). The CES examines future energy needs in the state and identifies opportunities to reduce ratepayer costs, ensure reliable energy availability, and mitigate the public health and environmental impacts of Connecticut's energy use, such as impacts from emission of greenhouse gases and criteria air pollutants.

The agency held a Scoping Meeting for the 2022 CES on January 6, 2022 (notice). DEEP subsequently has held a series of technical meetings on hydrogen, end uses that are hard to decarbonize, building thermal decarbonization, active demand response, and alternative fuels: April 6, 2022 (hydrogen), September 1, 2022 (end uses that are hard to decarbonize), September 22, 2022 (building thermal decarbonization – heat pump barriers and market strategies), September 23, 2022 (building thermal decarbonization – heat pumps [continued]; support strategies), November 3 (active demand response), and November 4 (alternative fuels) (see previous notices: hydrogen; technical meetings 1-4; technical meetings 5-6). Technical Meeting 4 on building thermal decarbonization economic potential and technology deployment targets was canceled (notice); and an additional opportunity for written comment on that topic was issued October 28, 2022 (notice).

Two additional technical sessions during December will help inform key elements of the CES: Session 7 on methane/natural gas distribution planning and policies was held on December 8, 2022 (notice); and Session 8 on market-based decarbonization programs and low-carbon incentives is scheduled for December 15, 2022 (notice).

By way of today's notice, DEEP invites stakeholders to submit written comments related to technical sessions 7 and 8. Please see the detailed invitation below.

Written comments

With this Notice of Request for Written Comments (Notice), **DEEP invites stakeholders to submit written comments related to technical sessions 7 and 8 by January 6, 2023, at 5:00 pm ET.**

Responses to the specific questions detailed below are requested. However, all comments related to technical sessions 7 and 8 are encouraged. When possible, please indicate the relevant session number(s) and question number(s) in the title or subtitle of a written comment.

Comment Opportunity for Session 7 – Methane/Natural Gas Distribution Planning and Policies

Comment Deadline: January 6, 2023, at 5:00 p.m.

Comments may be filed electronically via the [Energy Filings web page](#) or submitted directly to DEEP at DEEP.EnergyBureau@ct.gov.

DEEP requests written comments in response to the following questions and any topics related to Technical Session 7. Please note the session number and any relevant question numbers in your response.

Questions:

1. Methane, in the form of natural gas, often has been portrayed as a “bridge to the future” – as an interim solution to help society transition away from the most carbon-intensive fossil fuels (esp. coal and petroleum) as it develops a path to a fully decarbonized energy system. In your view, is this strategy one that Connecticut should continue to pursue? Why or why not? If so, for how long, for which end uses, and why those specific end uses?
2. How should Connecticut’s energy policy handle any tradeoffs between methane’s climate/environmental impacts and the reliability and resilience benefits it can be understood to offer?
3. To what extent should Connecticut pursue reductions in the carbon intensity of distributed methane? Which of the following methods for doing so are promising, which are not, and why?
 - a) Substitution with renewable natural gas, hydrogen, and/or synthetic gas
 - b) Infrastructure changes/upgrades
 - c) Methane demand response
 - d) Methane source standards and/or certifications
 - e) Other
4. Should Connecticut engage in a planned phaseout of the methane/natural gas distribution system?
 - a) If so, why, how, and on what time scale? How should the state handle the thorny issues of costs, stranded assets, safety, consumer equity, and workforce equity?
 - b) If not, why? How do you see the state achieving the goals of the Global Warming Solutions Act with the continued use and maintenance of the methane/natural gas distribution system?

5. Should Connecticut seek to phaseout the use of methane as an energy source within the state?
 - a) If so, why, how, and on what time scale? How should the state handle the thorny issues of costs, stranded assets, safety, consumer equity, and workforce equity?
 - b) If not, why? How do you see the state achieving the goals of the Global Warming Solutions Act despite continuing widespread use of methane/natural gas?
6. Should Connecticut adjust or change its current natural gas planning processes, funding, and/or requirements?
 - a) If so, what changes do you recommend? And how would you recommend going about changing current planning processes?
 - b) If not, why?
7. What public process would you recommend Connecticut undertake for further exploring the issues raised in questions 1-6 above?

Comment Opportunity for Session 8 Market-Based Decarbonization Programs and Low-Carbon Incentives

Comment Deadline: January 6, 2023, at 5:00 p.m.

Comments may be filed electronically via the [Energy Filings web page](#) or submitted directly to DEEP at DEEP.EnergyBureau@ct.gov.

DEEP requests written comments in response to the following questions and any topics related to Technical Session 8. Please note the session number and any relevant question numbers in your response.

Questions:

1. Should the social cost of carbon associated with the use of fossil fuels (for heating, transportation, or other end uses) be reflected in Connecticut's energy costs? If so, why and how? If not, why?
2. Is regional/multi-state collaboration critical to the success of market-based decarbonization programs?
 - a. If so, why? And for which sectors (thermal, electricity-generation, and/or transportation) is regional/multi-state collaboration most and least critical?
 - b. If not, why?
3. Which models for market-based decarbonization programs and low-carbon incentives are most appropriate for improving *thermal* energy policy in Connecticut? Why?
4. Which models for market-based decarbonization programs and low-carbon incentives are most appropriate for improving *electricity-generation* policy in Connecticut? Why?
5. Which models for market-based decarbonization programs and low-carbon incentives are most appropriate for improving *transportation* energy policy in Connecticut? Why?

6. How can energy affordability and energy justice goals be advanced through market-based decarbonization programs? Are there best practices from other states and/or nations of which Connecticut DEEP should be aware?
7. What are the benefits and challenges of market-based decarbonization programs, especially in comparison to mandates and standards? Which industries and/or market segments are likely to prefer market-based programs and why?

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