



STATE OF CONNECTICUT

COUNCIL ON ENVIRONMENTAL QUALITY

August 13, 2021

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Peter Hearn
Executive Director

Emily Rice, Executive Secretary
Connecticut Energy Efficiency Board
c/o Department of Energy and Environmental Protection,
10 Franklin Square
New Britain, CT 06051.

Dear Ms. Rice:

The Council on Environmental Quality (“the Council”) supports measures to conserve energy and improve energy efficiency, like those that are outlined in the draft 2022-2024 Conservation & Load Management Plan (C&LM). It would be unfortunate if, in the implementation of some of those measures, the opportunity for preventing possible environmental harm is overlooked. An oversight of this nature is possible if deteriorating fuel containers and connections for oil burning systems remain ineligible for financing through the CT Heating Loan program. Other states¹ deter uncontrolled releases of fuel oil by requiring inspections of the containment vessels and supply lines of oil-fired furnaces and boilers. It would be prudent for the CT Heating Loan program to require an inspection of the oil storage tank and associated supply lines whenever an oil-fired furnace or boiler repair or replacement is being considered for a loan under the program.

The Council’s 2019 research paper, [*Fuel for Thought*](#), documented that nearly 9,000 fuel oil releases were reported at private residences from January 2010 to September 2019. The potential economic impact that an uncontrolled fuel oil release could have for a property owner can be substantial and it is compounded if the release expands into the environment. It requires only a very small amount of oil to contaminate a source of drinking water or to create a hazard or annoyance at neighboring properties.

Presently, the draft C&LM Plan states that the Energy Efficiency Board will “continue to offer several financing options to residential customers pursuing comprehensive energy efficiency projects”, including the Energize CT Heating Loan program which provides low interest loans up to \$15,000 for improvements to a heating system, including oil-fired furnaces and boilers. Unfortunately, replacement of an oil storage tank is not eligible for financing through the CT Heating Loan program.

It would advance the equity and energy affordability goals of the C&LM Plan if the CT Heating Loan program include the financing of upgrades for fuel storage vessels and delivery systems that are in poor condition and pose a risk of an uncontrolled release. A property owner who is unaware of the risk from a deteriorating tank or supply line might suffer a release that would negate any savings benefit achieved by a low interest loan.

It is important to note that the three-year horizon of the C&LM plan coincides with the State's initiative to address and revise how spills are reportedⁱⁱ and how releases are remediatedⁱⁱⁱ. Addressing the issue of spill prevention at the same time as improving energy efficiency is a step towards eliminating silos in State programs.

Thank you for your consideration of these comments.



Peter Hearn
Executive Director

ⁱ Connecticut Council on Environmental Quality publication *Fuel for Thought*, p.9, December 2019 [Fuel-for-Thought--Recommendations-to-Reduce-the-Incidences-and-Severity-of-Accidental-Releases-of-Ho.pdf \(ct.gov\)](#).

ⁱⁱ Connecticut Department of Energy and Environmental Protection, Press Release March 15, 2021 [DEEP to Hold Hearing \(ct.gov\)](#)

ⁱⁱⁱ Public Act 20-9 <https://www.cga.ct.gov/2020/ACT/PA/PDF/2020PA-00009-R00HB-07001SS3-PA.PDF>