

STATE OF CONNECTICUT

COUNCIL ON ENVIRONMENTAL QUALITY

Keith Ainsworth Acting Chair

Christopher Donnelly

David Kalafa

Aimee Petras

S. Derek Phelps

Denise Rodosevich

Charles Vidich

William Warzecha

Paul Aresta Executive Director August 28, 2024

To: DEEP.EnergyBureau@ct.gov

Re: Draft 2024 Connecticut Clean Hydrogen Roadmap

The Council on Environmental Quality (Council) provides the following comments in response to the Department of Energy and Environmental Protection's (DEEP) request for comments regarding the Draft 2024 Connecticut Clean Hydrogen Roadmap.

The Council supports the development and use of clean hydrogen as an energy carrier to reduce air emissions, including greenhouse gases (GHG). Hydrogen can also provide certain operational benefits for a variety of end use applications, and ultimately, consumers will decide which low carbon technology is most appropriate for their use.

The draft Hydrogen Roadmap excludes light-duty trucking or light duty vehicles, combined heat and power, and low and medium temperature heat end uses from the analyses because it is identified as being incompatible with the "Affordability Energy Strategy Lens" or "Affordability Lens" since there might be more affordable low carbon options available. The Council does not dispute that there might be more affordable low carbon options available, but by excluding these end uses from the analyses, it is not possible for the public and policymakers to appropriately compare and consider these end use applications with other transport and industry end uses for the various "lenses" analyzed. The provision of such information, including but not limited to potential emissions reductions and mitigation abatement costs would assist policymakers and consumers make informed decisions regarding low carbon options for the transportation and industry sectors.

The Council strongly supports the analyses and consideration of environmental justice principles in the Hydrogen Roadmap.

Thank you for your consideration of the Council's comments.

Sincerely

Paul Aresta

Executive Director