



August 17, 2016

VIA ELECTRONIC MAIL

Governor's Council on Climate Change
Analysis, Data & Metrics (ADM) Working Group
Email: deep.climatechange@ct.gov

RE: Comments of the Sierra Club to the ADM Working Group

Dear Members of the ADM Working Group:

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 Analysis Data & Metrics (ADM) Working Group's July 26, 2016 meeting. We continue to appreciate the work of the Governor's Council on Climate Change (GC3) and the ADM Working Group and Governor Malloy's leadership in ensuring that Connecticut proactively plans to meet its long-term climate goals. As the Working Group's July 26th presentation highlights, Connecticut made substantial progress in reducing its climate emissions between 1990 and 2013, and particularly between 2001 and 2013. However, the available data also confirm that more needs to be done. Global temperatures continue to climb, with July 2016 being the absolute hottest month on Earth in 136 years of collecting data.¹ At the same time, greenhouse gas (GHG) emissions in Connecticut have increased in the past three years, and even using the Department's 2013 data, Connecticut lags behind its peer states in the region in GHG emissions per capita. We cannot afford to delay the transition to a clean energy future. To that end, we offer the following comments on the modeling and the process moving forward.

(1) Recognize the need for clean, renewable generation to power load from electrification of transportation, and discontinue investment in natural gas for electricity and home heating

The modeling scenarios presented highlight the substantial GHG reductions Connecticut anticipates from electric passenger cars and trucks. To maximize benefits from electrification of transportation, it is critical that these new electric vehicles are tapping into clean energy resources rather than increasing utilization of fossil fuel generation. At the same time, the modeling also highlights that continued investment in natural gas, either as a generation fuel or as a replacement for oil for home heating is simply incompatible with Connecticut's desired climate future based on gas's significant direct and even more significant 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

¹ Jason Samenow, July was 'absolutely' Earth's hottest month ever recorded, The Washington Post (Aug. 17, 2016), available at <https://www.washingtonpost.com/news/capital-weather-gang/wp/2016/08/16/july-was-absolutely-earths-hottest-month-ever-recorded/>.

the same functions and enable Connecticut to leapfrog fossil fuels entirely. Rather than investing ratepayer money in gas infrastructure that ultimately cannot achieve Connecticut's climate goals, ratepayers dollars should only flow to supporting truly clean, renewable resources and efficiency.

(2) Continue to include modeling scenarios that accelerate deployment of GHG reduction measures relative to a linear emission trajectory

We appreciate the Workgroup's inclusion of Scenario 4, which considers an accelerated 55% reduction in GHG emissions through 2030 on its path to 80% by 2050. There are significant environmental and economic benefits to accelerating implementation of the measures needed to achieve Connecticut's long-term climate goals. Implementing these programs will generate jobs and foster a robust clean energy industry in Connecticut in the near term. Additionally, given the residence time of carbon dioxide in the atmosphere, early reductions of CO₂ emissions produce important climate benefits. The Sierra Club previously provided modeling showing that achieving a region-wide 40% reduction in GHG emissions from a 1990 baseline by 2030 could be achieved with very large benefits to the region and the state.² Further acceleration of these reductions is also likely to be a win-win for Connecticut. The Sierra Club urges the GC3 to continue to include in its modeling scenarios that frontload the GHG reductions necessary to achieve Connecticut's longer-term 2050 climate goals.

(3) Build out the benefits and costs of the modeled scenarios

As the modeling presented on July 26th demonstrates, while there are many commonalities between scenarios, there is more than one path to achieving Connecticut's long-term climate goals, and there are options regarding how rapidly to deploy the necessary compliance measures. In guiding future policy recommendations from the GC3, it is important to develop a meaningful understanding of the full range of benefits resulting from implementing each scenario, as well as the attendant costs. A meaningful analysis will consider not merely direct economic impacts such as job-years created and impacts to electric bills, but also indirect economic benefits, such as reduced asthma attacks and emergency department visits as a result of cleaner air, and environmental benefits. The analysis should also incorporate broader considerations of equity. The City of Portland and Multnomah County in Oregon have done pioneering work in incorporating principles of equity into climate action planning, including the creation of an Equity Working Group and development of a Climate Action Plan Equity Implementation Guide with best practices.³ In developing its own recommendations, the ADM Working Group should be guided by an equity lens and call out GHG reduction measures—such as investments in zero emission buses—that can have outsize benefits for low-income communities.

² Synapse Energy Economics, The RGGI Opportunity 2.0: RGGI as the Electric Sector Compliance Tool to Achieve 2030 State Climate Targets (updated Mar. 4, 2016), attached as an exhibit to Sierra Club's March 31, 2016 comments, and available at http://www.synapse-energy.com/sites/default/files/RGGI_Opportunity_2.0.pdf (finding that the region would achieve \$25.7 billion in total savings while adding an average of 58,400 job-years per year and Connecticut would see carbon emissions from natural gas, buildings, and transportation decline, while adding thousands of jobs in the renewable and electric and gas energy efficiency sectors).

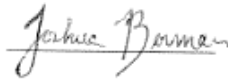
³ Materials from the 2015 Climate Action Plan, including a Climate Action Through Equity case study area available at <https://www.portlandoregon.gov/bps/66993>.

(4) Provide timely guidance on translating the lessons learned from the modeling into concrete actions

The Sierra Club appreciates the GC3 and ADM Working Group's efforts to date and looks forward to the release of the Council's report synthesizing these efforts. We urge the GC3 to establish a time frame for release of its report and recommendations that will enable recommendations requiring additional legislative authorization to be addressed during the upcoming Legislative Session.

Thank you for your consideration.

Respectfully submitted,



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