Appendix A8- Public Comment Review Report

Comment No.	Commenter Name	Affiliation	Written/ Oral	Section	Subject	Comment Summary	DEEP Response
1	Bernard Pelletier	PACE	Oral	Objective 4	Siting	Supports solar siting recommendations because PACE is studying potential for solar carports	DEEP appreciates these comments and will take them into account in future energy planning processes. A note on carport siting as a potential innovative solar siting approach in Objective 4. In regards to numeric data, preparing the extensive data for public consumption will require significant time and resources that are outside of the scope of funding and work contracted for this IRP. DEEP will include this data availability as a requirement in future plans and scopes of work.
1	Bernard Pelletier	PACE	Oral	IRP In General	Modeling	IRP needs to clearly articulate what the metric of decarbonization is. A spreadsheet would be helpful.	
2	Thomas Melone	Allco	Oral	Objective 3	Affordability	IRP needs more focus on reducing ratepayer costs	DEEP appreciates these comments and addresses several of these points in its revisions in Objective 5, and its recommended strategies. Additionally, DEEP encourages the commenter to see Objectives 2 and 3 for discussion and recommendations on improving energy affordability.
2	Thomas Melone	Allco	Oral	IRP In General	Workforce Development	IRP needs more focus on workforce development in state	
2	Thomas Melone	Allco	Oral	Objective 1	Modeling Assumptions	IRP says because CT's grid is integrated with the rest of New England, meeting the 100% zero carbon target in 2040 is not practically achievable independent of the other states. This approach is wrong, CT should focus on creating in-state zero-carbon grid and should not spend CT ratepayer money to build the grid and create jobs in other states.	
2	Thomas Melone	Allco	Oral	Objective 1	Millstone	Millstone should be the foundation for any zero-carbon plan in CT.	

Comment No.	Commenter Name	Affiliation	Written/ Oral	Section	Subject	Comment Summary	DEEP Response
2	Thomas Melone	Allco	Oral	Objective 1	Modeling Results	It is concerning that the IRP says we are going to maintain the status quo until 2023 when the investment tax credit will probably run out by then making the costs of renewables even higher.	
2	Thomas Melone	Allco	Oral	Strategies	BTM Solar	It is great that the IRP recognizes the benefit to maintaining at least historic levels of distributed generation, but it needs to do more and should adopt programs like what MA has.	
2	Thomas Melone	Allco	Oral	Objective 1	Offshore Wind	IRP needs to be more realistic about offshore wind because there could be risks when it comes to major storms and hurricanes.	
2	Thomas Melone	Allco	Oral	Strategies	Microgrids	Microgrids are extremely important and CT can build a zero-carbon grid for itself without out-of-state resources.	
2	Thomas Melone	Allco	Oral	Objective 2	Natural Gas	DEEP raises the point that CT hosts a disproportionate share of fossil resources but continues to approve gas plant in Killingly, CT	
3	Peter Millman		Oral	Objective 2	Competition/ utility control	Utilities monopolize procurements, energy efficiency funds, demand response programs, solar and battery incentives; these spaces are not appropriately competitive; community choice aggregation would make procurements more competitive and provide an additional incentive for batteries/storage.	DEEP appreciates these comments and will take them into account in future energy planning processes.

Comment No.	Commenter Name	Affiliation	Written/ Oral	Section	Subject	Comment Summary	DEEP Response
4	Roger Kuhns	Citizens Climate Lobby	Oral	Objective 1	100% Zero Carbon Target	Goals seem to be in conflict with Killingly; consider how to implement a carbon tax that furthers our decarbonization goals and provides a dividend to citizens	DEEP appreciates these comments and encourages the commenter to see the discussion on an in-state a carbon tax analysis in Objective 4 and in Appendix A6. Revisions made in response to the comments on microgrids and cybersecurity can be found in Objective 5, as well as in Part II: Strategies.
4	Roger Kuhns	Citizens Climate Lobby	Oral	Strategies	Microgrids	Endorse more action on microgrids but note that fossil-powered back-up generators undermine their purpose; add that microgrids increase (cyber)security; add that we need to stop permitting natural gas power plants	
5	Peter Shattuck	Anbaric	Oral	Objective 5	Transmission	It is critical to focus on transmission in order to achieve Connecticut's and the region's decarbonization goals.	DEEP appreciates these comments and addresses some of these issues in its revisions in Objective 5.
5	Peter Shattuck	Anbaric	Oral	Strategies	Transmission	There should be a regional transmission planning process but there also needs to be a Connecticut process that develops a clear timeline.	
5	Peter Shattuck	Anbaric	Oral	Strategies	Energy Storage	CT should move forward with mechanisms to bring storage online as storage provides a real opportunity to replace peaking power plants.	
6	Joel Gordes	Semi-retired Consultant	Oral	Strategies	Microgrids	The most secure thing we can do is move to a micro-grid type of energy system.	DEEP appreciates these comments and addresses some of these points in its revisions in Objective 5 as well as in Part II: Strategies, Strategy 16.
6	Joel Gordes	Semi-retired Consultant	Oral	Objective 5	Security	The issue of security is barely mentioned in the IRP. Should be included in Objective 5	

Comment No.	Commenter Name	Affiliation	Written/ Oral	Section	Subject	Comment Summary	DEEP Response
7	Stephen Sack		Oral	TRPS	Biofuels	Biodiesel (BD) is available here, now, cheaply, and is produced in CT; in contrast, clean electricity to run heat pumps (HPs) is not; so IRP's logic in resisting BD is faulty. HPs are costly to install, which is particularly a burden for low-to-moderate income households; and the grid is not ready to supply all the electricity they require (and buying RECs is a false solution).	DEEP appreciates these comments and feedback and will take them into account in future energy planning processes. DEEP is heartened that fuel oil dealers are committed to very deep reductions in fossil oil use, and the agency supports a near-to-medium-term role for BD through a blending mandate. The agency has revised Part III to more fully address the issue of GHG emissions reductions.
7	Stephen Sack		Oral	TRPS	ASHPs	Biodiesel (BD) is available here, now, cheaply, and is produced in CT; in contrast, clean electricity to run heat pumps (HPs) is not; so IRP's logic in resisting BD is faulty. HPs are costly to install, which is particularly a burden for low-to-moderate income households; and the grid is not ready to supply all the electricity they require (and buying RECs is a false solution).	
8	Amy McLean	Acadia Center	Oral	IRP In General	Goals	Pleased the draft is released and that DEEP acknowledges future IRPs may have more stringent targets, plan to submit robust written comments; caution DEEP not to rely too heavily on out-of-state clean energy to meet goals or in-state fossil generation to meet demand	DEEP appreciates these comments and will take them into account in future energy planning processes.

Comment No.	Commenter Name	Affiliation	Written/ Oral	Section	Subject	Comment Summary	DEEP Response
9	Elias Petersen	American Green Fuels	Oral	TRPS	Biofuels	Urges acceleration of adoption of biodiesel (BD), which offers here-and-now GHG reductions at low cost.	DEEP appreciates these comments and feedback and will take them into account in future energy planning processes. DEEP supports a near-to-medium-term role for biodiesel through a blending mandate. The agency has revised Part III to more fully address the issue of GHG emissions reductions.
10	Floyd Vergara	National Biodiesel Board	Oral	TRPS	Biofuels	(1) IRP implies that using petroleum to heat during years while heat pumps (HPs) are phased in is better than using biodiesel (BD). This is patently false, because BD offers immediate environmental benefits; esp. important because early GHG reductions are better than later GHG reductions. "The State can't in good faith argue that there's a climate emergency while turning its back on immediate GHG reductions achievable through the use of Bioheat and other products that displace petroleum." Deploy BD and HPs in parallel. (2) EPA study that IRP cites on NOx "is dated." BD results in NOx reductions. (3) Industry is rapidly developing appliances that can accommodate BD, so IRP's assertion to the contrary is false.	DEEP appreciates these comments and feedback and will take them into account in future energy planning processes. DEEP supports a near-to-medium-term role for BD through a blending mandate. The agency has revised Part III to more fully address the issue of GHG emissions reductions and to reflect the Brookhaven National Lab analysis of the NOx issue that NBB provided in early 2021.

Comment No.	Commenter Name	Affiliation	Written/ Oral	Section	Subject	Comment Summary	DEEP Response
11	Chris Herb	Connecticut Energy Marketers Association	Oral	TRPS	Biofuels	Just as electric grid needs time to remove natural gas from generation; fuel oil industry needs time to remove fossil fuel from heating. Biodiesel (BD) can accomplish today and cheaply what heat pumps (HPs) will be able to accomplish only slowly, if ever, and at great cost. The T-RPS is inherently germane to electricity sector and hence belongs in IRP. Kolmar facility is exporting BD to CA and MA instead of selling it in CT.	DEEP appreciates these comments and feedback and will take them into account in future energy planning processes. DEEP supports a near-to-medium-term role for BD through a blending mandate. The agency has revised Part III to more fully address the issue of GHG emissions reductions.
11	Chris Herb	Connecticut Energy Marketers Association	Oral	TRPS	ASHPs	Just as electric grid needs time to remove natural gas from generation, fuel oil industry needs time to remove fossil fuel from heating. Biodiesel (BD) can accomplish today and cheaply what heat pumps (HPs) will be able to accomplish only slowly, if ever, and at great cost. The T-RPS is inherently germane to electricity sector and hence belongs in IRP. Kolmar facility is exporting BD to CA and MA instead of selling it in CT.	
12	Bernard Pelletier & Mark Scully	PACE	Written	Objective 4	Siting	PACE has analyzed the potential of solar sited on canopies over parking lots and over impervious surface and has concluded that this is a significant and under-appreciated resources. PACE supports DEEP in actively investing in more innovative approaches to its internal processes associated wiht solar siting.	DEEP appreciates these comments and will take them into account in future energy planning processes. Revisions made in response to these comments can be found in Objective 4. DEEP encourages commenters focused on renewable siting to participate in the forthcoming solar siting process recommended by this IRP.

Comment No.	Commenter Name	Affiliation	Written/ Oral	Section	Subject	Comment Summary	DEEP Response
12	Bernard Pelletier & Mark Scully	PACE	Written	Objective 4	Siting	Recommended text added on page 111 between the third and fourth paragraphs stating: "The Department is aware of studies quantifying the solar potential of parking lot canopies to supply electricity behind the meter and to the grid. Synapse Energy Economics has completed a study in Rhode Island4and the nonprofit People's Action for Clean Energy (PACE) has also quantified this potential in Connecticut. The PACE study shows that in many towns a substantial amount of the load of the town can be generated from solar canopies. The PACE study points out that the economics of these projects is typically challenging, but also finds that Massachusetts, New York, Rhode Island, and New Jersey have developed specific incentives (e.g., "adders")that make these projects financially feasible. Providing greater incentives to solar canopies on impervious surfaces will reduce the need to site arrays on agricultural lands and forests."	
12	Bernard Pelletier & Mark Scully	PACE	Written	Strategies	Siting	Recommended text to be added on page 157 at the bottom of Strategy 10: "The Department is aware of incentive programs in several states (e.g., "adders") that make solar canopies over parking lots financially attractive. As Connecticut seeks to balance the twin goals of environmental	

Comment No.	Commenter Name	Affiliation	Written/ Oral	Section	Subject	Comment Summary	DEEP Response
						preservation with the responsible siting of solar the introduction of improved incentives for solar canopies should be explored."	
13	Scott Fenwick	National Biodiesel Board	Written	TRPS	Biofuels	Must avoid increasing stress on electric grid. No silver bullet; must adopt existing technologies to make incremental progress. DEEP's concern about feedstocks and production location are out of synch with its lack of concern about differing lifecycle GHG impacts of various petroleum products. DEEP's concern about supporting long-term fossil fuel use does not account for the fact that there is a clear path to extend BD use to net zero. Cannot provide definitive estimate of cost of distribution infrastructure changes needed in CT; but no serious obstacles seen. On NOx issue: Study by NREL and HARC found no no effect on O2 and PM2.5 attainment.	DEEP appreciates these comments and feedback and will take them into account in future energy planning processes. DEEP supports a near-to-medium-term role for BD through a blending mandate. The agency has revised Part III to more fully address the issue of GHG emissions reductions and to reflect the Brookhaven National Lab analysis of the NOx issue that NBB provided in early 2021.
14	Joel Gordes	semi-retired Consultant	Written	IRP In General	Security	DERs provide energy security yet there is hardly any discussion of distributed energy resource energy security aspects in the IRP. PURA should investigate a direct rate of return for excellence in energy security, a metric we ought to examine.	DEEP has included revisions to Objective 5 in response to these comments on grid security and microgrids, as well as in Part II: Strategies. DEEP appreciates these comments and will take them into account in future energy planning processes.
14	Joel Gordes	semi-retired Consultant	Written	Strategies	Microgrids	Grid hardening, at great cost, will provide near zero protection against cyber threats but may receive more than its fair share of funding. DERs paired with decentralized microgrids offers	

Comment No.	Commenter Name	Affiliation	Written/ Oral	Section	Subject	Comment Summary	DEEP Response
						additional security advantages. Referenced the NY Public Service Commission's Reforming the Energy Vision report.	
14	Joel Gordes	semi-retired Consultant	Written	Objective 5	Transmission	Policymakers should be acutely aware that large transmission projects could become the stranded cost of the future in addition to making the grid more complex and prone to failure.	
14	Joel Gordes	semi-retired Consultant	Written	Objective 5	Transmission	Decentralization may be a better way to deal with electromagnetic threats, siting NERC.	
15	Joel Gordes	semi-retired Consultant	Written	IRP In General	Modeling	Suggest that utilities and the State (perhaps in coordination with other states through NARUC) undertake retrospective analysis of IRP and RPS to evaluate and improve their accuracy	
16		Diversified Energy Specialists	Written	TRPS	Biofuels	"30-50% biodiesel blends can compete with cold climate heat pumps in the Northeast" (7). No capital investment required, high potential for widespread adoption, fast rate of adoption (7). Rapid ability to reduce oil customers' GHG emissions 45% "with a B50 blend immediately" (8). Heating oil industry has committed to 40% GHG reductions by 2030 and net zero by 2050 (8). BD is "drop-in fuel" that will "provide cost savings to all ratepayers" (8) and reduce energy affordability gap (9). GHG reductions today are more important than GHG reduction	DEEP appreciates these comments and feedback and will take them into account in future energy planning processes. DEEP supports a near-to-medium-term role for BD through a blending mandate. The agency has revised Part III to more fully address the issue of GHG emissions reductions. DEEP recognizes the need to assure equity in all energy policies and intends that electrification policies will be equitable.

Comment No.	Commenter Name	Affiliation	Written/ Oral	Section	Subject	Comment Summary	DEEP Response
						tomorrow (14). In light of BD's ability to reduce electricity demand and suppress electricity costs, referring to BD as 'unrelated to provision of electricity' is bogus (16). DEEP harps on ratepayer cost of BD subsidy but has developed no estimate of that cost (18). In fact, cost of MA APS program is merely $0.00014/kWh (18). Subsidizing HPs but not BD "perpetuates systemic inequity" (18). "If Connecticut DEEP develops the final draft of the IRP with environmental justice populations in mind, they will conclude that a Thermal RPS program that incentivizes biodiesel at the distributor level will improve the health and economics of every Connecticut resident" (23). [Note language throughout that assumes T-RPS would provide subsidy for BD households, rather than BD distributors (e.g., bottom of 18). But cf. "incentivizing [BD] at the distributor level" (22)]. MA APS demonstrates rapid GHG reductions at low cost to electricity ratepayers (21-22).	
16		Diversified Energy Specialists	Written	TRPS	ASHPs	Heat pumps (HPs) add greatest load during winter peak, when load is dirtiest, and will increase ratepayer cost (7). High capital investment, low potential for widespread adoption, slow rate of adoption (7). High investment cost "alienates lower	

Comment No.	Commenter Name	Affiliation	Written/ Oral	Section	Subject	Comment Summary	DEEP Response
						socioeconomic classes" (8); and electrification hurts environmental justice communities due to capital cost and higher electric rates (9). [See summary of comments on Objective 1/Modeling regarding HPs.] Wholesale cost of added winter peak load will be hidden by CT's 6-month cost averaging (15). Heating electrification "directly contradicts the goal of eliminating growth in electric demand" (15) and jeopardizes CT's ability to meet 2030 goal (17). The Texas debacle is a cautionary tale for CT regarding overreliance on electrification of heating (20-21).	
16		Diversified Energy Specialists	Written	Objective 1	Modeling	"The end result of 'electrify everything' being the only pathway to reduce greenhouse gas emissions from the building sector ... were predetermined and the data was carefully chosen and manipulated to support that conclusion" (9). Modeling data low-balled kWh consumption by ASHPs and ignored kWh for supplemental resistance heating (10-12). "The projections are manipulated to meet their 'electrify everything' narrative" (11). HPs reportedly are rarely being used for heating (12-13). HP electricity load cannot be shifted to off-peak hours (16).	DEEP understands the comments and recognizes that electrification of thermal load creates a complicated dynamic. However, the IRP is not the document that studies the costs and benefits of electrification or alternatives to electrification. The appropriate planning document for that discussion in the Comprehensive Energy Strategy. DEEP is beginning that process following the finalization of the IRP. However, DEEP thought it important to study what an increase in load from electrification would mean for achieving the zero carbon electric

Comment No.	Commenter Name	Affiliation	Written/ Oral	Section	Subject	Comment Summary	DEEP Response
16		Diversified Energy Specialists	Written	Objective 5	Modeling	"The end result of 'electrify everything' being the only pathway to reduce greenhouse gas emissions from the building sector ... were predetermined and the data was carefully chosen and manipulated to support that conclusion" (9). Modeling data low-balled kWh consumption by ASHPs and ignored kWh for supplemental resistance heating (10-12). "The projections are manipulated to meet their 'electrify everything' narrative" (11).	supply for Connecticut customers. Accordingly, DEEP used a very high-level estimate for electrification to study. A high-level estimate was appropriate because DEEP was not presupposing any solution to the decarbonization of the thermal sector.
16		Diversified Energy Specialists	Written	Objective 3	ASHPs	"Connecticut DEEP's conclusion of electrifying the thermal sector and not recommending a Thermal Renewable Portfolio Standard that incentivizes biodiesel is an example of systemic inequity" and "is extremely dangerous to the health and economic well-being of the environmental justice populations in Connecticut" (20).	DEEP appreciates these comments and feedback and will take them into account in future energy planning processes. DEEP recognizes the need to assure equity in all energy policies and intends that electrification policies will be equitable.
18	Sam Wade	Renewable Natural Gas Coalition	Written	TRPS	Biofuels	"[O]ur industry views the implementation of a thermal renewable portfolio standard inclusive of RNG as the best way to promote the use of RNG in stationary thermal applications." Especially with moves to deemphasize landfill gas in electric RPS, urges inclusion of landfill methane in T-RPS.	DEEP appreciates these comments and feedback and will take them into account in future energy planning processes.

Comment No.	Commenter Name	Affiliation	Written/ Oral	Section	Subject	Comment Summary	DEEP Response
18	Sam Wade	Renewable Natural Gas Coalition	Written	Objective 6	Biofuels	"[W]e strongly support DEEP's goal of offering RNG purchase agreements which, in tandem with upholding similar support in the electricity sector, will facilitate the increased development of anaerobic digesters, configured for either electricity or RNG production depending on location and other parameters." Also: "DEEP's electricity sector modeling only includes offshore wind, land-based wind, grid-scale solar photovoltaics, nuclear, imported hydro, and grid-scale battery storage. As part of the ongoing consideration for how best to use renewable gaseous resources, DEEP should continue to assess the potential for hydrogen, biogas, and RNG to contribute in the electricity sector as firm zero-carbon or low-carbon resources."	DEEP appreciates these comments and feedback and will take them into account in future energy planning processes.
19	Ron Nelson	Citizen	Written	Objective 2	BTM Solar	Force people to go solar and reap those savings and financial benefits and make the world cleaner.	DEEP appreciates these comments and will take them into account in future energy planning processes.
19	Ron Nelson	Citizen	Written	Objective 1	EVs	Incentivize electric vehicle purchases and force all dealers to sell electric vehicles.	
19	Ron Nelson	Citizen	Written	Strategies	Energy Storage	Every home needs a battery and the utilities need us to as well. Provide incentives and force the utiliteis to buy the homeowners clean energy stored by their solar into their batteries.	

Comment No.	Commenter Name	Affiliation	Written/ Oral	Section	Subject	Comment Summary	DEEP Response
20	Diane Shonebarger	Citizen	Written	Objective 3	Electric rates	Residents are effectively forced to choose between two electricity providers (Eversource and UI) whose rates are exorbitantly high; state agencies and representatives are not doing enough to address this issue; understands need for green and renewable resources but adding solar and wind will only increase Eversource rates	DEEP appreciates these comments and encourages the writer to see Objectives 2 and 3 which discuss energy costs and affordability issues in Connecticut now and in the future.
20	Kelly Fowler	Citizen	Written	Objective 3	Affordability	CT residents cannot afford clean energy. Thousands of people in Facebook groups complaining about Eversource costs. IRP plans are too expensive and residents cannot afford this.	
20	Kelly Fowler	Citizen	Written	IRP In General	Decarbonization Strategy	IRP plan is too expensive and residents cannot afford this.	
21	Janice Newton	Citizen	Written	Objective 1	DERs	Continue to emphasize solar and wind projects and work to create an efficient grid that accommodates these fluctuating resources	DEEP appreciates these comments and will take them into account in future energy planning processes.
22	David Newton	Citizen	Written	Strategies	Markets	Supports the efforts underway to reform ISO-NE policies	DEEP appreciates these comments and will take them into account in future energy planning processes.
22	David Newton	Citizen	Written	Objective 1	Decarbonization Strategy	Encourages additional emphasis on long-term benefits of the cleanest available resources. Has no objections to nuclear power if it is properly disposed.	
23	Barry Schlosser	Citizen	Written	IRP In General	Structure	Report is complex and dense; not a clearly understandable or executable plan; intended audiences are unclear.	DEEP appreciates these comments and has made clarifications throughout the document in an effort to improve

Comment No.	Commenter Name	Affiliation	Written/ Oral	Section	Subject	Comment Summary	DEEP Response
23	Barry Schlosser	Citizen	Written	Objective 3	Affordability	Raised concerns about energy affordability and ask DEEP to address: 1) expected timeline of IRP impacts on customer bills, 2) what the state is doing to increase energy affordability, 3) what state agencies are doing to "reign in" utility rate practices.	readability. DEEP also encourages the writer to see Objectives 2 and 3 which discuss energy costs and affordability issues in Connecticut now and in the future.
24	Mary Louise Nuara	Dominion Energy Services, Inc.	Written	Objective 1	Modeling	Dominion is pleased that DEEP modeled a pathway where Millstone continues to operate beyond its current contracts.	DEEP appreciates these comments and will take them into account in future energy planning processes.
24	Mary Louise Nuara	Dominion Energy Services, Inc.	Written	Objective 1	Millstone	Preservation of in-state nuclear power reduces by does not eliminate the need and opportunity for Connecticut to procure new carbon-free resources. Dominion stands ready to partner with all stakeholders to explore state, regional, and federal solutions to ensure Millstone can continue to operate.	
25	Bernie Pelletier	PACE	Written	IRP In General	Modeling	The numeric data behind the graphs should be made available so that others may use it in analyses. Additionally, the graphs should have data labels directly tied to the graph	DEEP appreciates these comments, and encourages the commenter to see the following responses: In regards to numeric data, preparing the extensive data for public consumption will

Comment No.	Commenter Name	Affiliation	Written/ Oral	Section	Subject	Comment Summary	DEEP Response
25	Bernie Pelletier	PACE	Written	IRP In General	Modeling	There should be a clear discussion of how attainment of the Executive Order No. 3 goal is to be measured. It appears it is based on procurement but if CT procures carbon free electricity from out of the state and still leave all carbon emitting generation active in the state that would still be "achieving" the goal.	require significant time and resources that are outside of the scope of funding and work contracted for this IRP. DEEP will include this data availability as a requirement in future plans and scopes of work. In regards to attainment of Executive Order No. 3 goal, DEEP encourages the commenter to see the Zero Carbon Pathways Modeling Methodology in Objective 1. In regards to ratepayer costs, please see the discussion on these topics in Objective 2. In regards to peak loads and microgrids, please see the new discussion added to Objective 5. In regards to the comments on biofuels, please see the added discussion to Section III: Thermal Renewable Portfolio Standard.
25	Bernie Pelletier	PACE	Written	Objective 2	Affordability	The IRP should express the disconnect between CT and ISO-NE in terms of the ratepayer cost in CT.	
25	Bernie Pelletier	PACE	Written	Objective 1	Modeling	It would be helpful to have a discussion of the possible alternatives to the status quo at ISO-NE, such as FERC Order 2222.	
25	Bernie Pelletier	PACE	Written	IRP In General	Peak Load	Peak load, especially winter peak is a crucial factor in assessing the reliability of the grid. There should be more discussion of this. Additionally, scenario review of the modelled cases where peak load fails to be balanced with clean energy supply should be undertaken. This should answer the questions: what hours, days and months are most difficult to make carbon free; and what fixes are most responsive?	
25	Bernie Pelletier	PACE	Written	Objective 1	Modeling	The IRP modelling should select a strawman path to serve as a baseline for discussion and reaction to future developments.	

Comment No.	Commenter Name	Affiliation	Written/ Oral	Section	Subject	Comment Summary	DEEP Response
25	Bernie Pelletier	PACE	Written	Strategies	Microgrids	The IRP should include a framing discussion of grid architecture and particularly on community microgrids.	
25	Bernie Pelletier	PACE	Written	TRPS	Biofuels	The IRP should explicitly call for a study to conclusively settle the question of NOX vis a vis regular fuel oil.	
25	Bernie Pelletier	PACE	Written	TRPS	Biofuels	Biofuels are a way to avoid putting "all our eggs in one basket" and serves as a way to reuse waste oil and reduce our waste footprint.	
26	Nathan Frohling	The Nature Conservancy in CT	Written	IRP In General	Decarbonization Strategy	IRP does not sufficiently stress the urgency that exists in the need to act and implement policy now. See page 146 first paragraph. Should be rephrased.	DEEP appreciates these comments. In regards to the urgency of policy, please see the rephrased text in Strategy 4 which clarifies DEEP's intent. In regards to ratepayer costs, please see Objectives 2 and 3. In regards to energy storage, please see the additional discussion in Objective 5. In regards to Millstone's environmental attributes, please see footnote 102.
26	Nathan Frohling	The Nature Conservancy in CT	Written	IRP In General	Affordability	TNC recognizes that the IRP is about creating a plan that achieves state emission/energy goals at the lowest cost possible. Costs borne by CT ratepayers must be more transparent with clear benefits to CT residents.	
26	Nathan Frohling	The Nature Conservancy in CT	Written	IRP In General	Millstone	Millstone plays a critical role in potential scenarios. Extension of contract to 2040 is the lowest cost/highest benefit pathway to achieving state emission/energy targets.	
26	Nathan Frohling	The Nature Conservancy in CT	Written	IRP In General	Energy Efficiency	Regional energy demand is projected to increase but much more discussion of energy efficiency is needed (see GC3 goals in consumption reduction).	

Comment No.	Commenter Name	Affiliation	Written/ Oral	Section	Subject	Comment Summary	DEEP Response
26	Nathan Frohling	The Nature Conservancy in CT	Written	IRP In General	Markets	ISO-NE governance and market structure are hampering CT and all the New England states efforts to achieve zero-carbon energy goals. CT ratepayers are having to disproportionately shoulder the burden of clean energy.	
26	Nathan Frohling	The Nature Conservancy in CT	Written	Objective 2	Fuel Cells	Concerned about the source of energy used in fuel cells. We suggest adding that renewable energy should be coupled with fuel cells instead of natural gas. The LREC/ZREC designation would imply that natural gas is not part of this program, but that is not accurate. In addition, if a fuel cell uses natural gas, it should not be eligible for this program and allowing yet another method for natural gas to be subsidized at the federal and state level.	
26	Nathan Frohling	The Nature Conservancy in CT	Written	Objective 5	Energy Storage	Concerned that storage and batteries are not being included in this discussion of curtailment. Storage should be part of any additional RFPs.	
26	Nathan Frohling	The Nature Conservancy in CT	Written	Strategies	Biomass Phasedown	TNC supports efforts to phase down procurement of biomass RECs.	
26	Nathan Frohling	The Nature Conservancy in CT	Written	Objective 5	Transmission	Supports reducing transmission constraints to reduce costs.	
26	Nathan Frohling	The Nature Conservancy in CT	Written	Objective 2	Affordability	We recommend including an appendix on why CT electric rates are the highest in the nation (after Hawaii). This could go a long way towards increasing transparency about rates.	

Comment No.	Commenter Name	Affiliation	Written/ Oral	Section	Subject	Comment Summary	DEEP Response
26	Nathan Frohling	The Nature Conservancy in CT	Written	Objective 4	Siting	Agree with and would promote a program of siting distributed energy resource in brownfields, abandoned/remediated sites, rooftop, and other underutilized areas rather than prime agricultural and forested land.	
26	Nathan Frohling	The Nature Conservancy in CT	Written	Strategies	REC Retention	We strongly support the analysis of whether REC retention is in the best interest of ratepayers and recommend that DEEP retain RECs from procurements.	
26	Nathan Frohling	The Nature Conservancy in CT	Written	Objective 1	Millstone	Millstone does not have environmental attributes. We request clarification for this statement on page 74 last paragraph.	
26	Nathan Frohling	The Nature Conservancy in CT	Written	Strategies	Reliability	Winter reliability should be more completely addressed in the Plan. It is our understanding that the current C&LM programs are inadequate for this purpose.	
26	Nathan Frohling	The Nature Conservancy in CT	Written	TRPS		T-RPS "could help incentivize RTT deployment and lower RTT cost."	
27	Jeff Bishop	Key Capture Energy	Written	Objective 1	Decarbonization strategy	Support systemic addition of wind and solar resources in anticipation of nuclear reduction	DEEP appreciates these comments and will take them into account in future energy planning processes.
27	Jeff Bishop	Key Capture Energy	Written	Objective 1	Decarbonization strategy	Urge additional emphasis on long-term benefits of the cleanest available resources as carbon-based fuels are phased out; no opposition to nuclear with proper waste disposal	
27	Jeff Bishop	Key Capture Energy	Written	Objective 5	Integration of variable energy resources	Hope actions to support a national grid will increase effectiveness of geographically-distributed variable energy resources	

Comment No.	Commenter Name	Affiliation	Written/ Oral	Section	Subject	Comment Summary	DEEP Response
27	Jeff Bishop	Key Capture Energy	Written	Strategies	Energy efficiency	Emphasize building insulation to further decrease carbon-based fuel consumption	
27	Jeff Bishop	Key Capture Energy	Written	Strategies	Markets	Support current efforts under way to form ISO-NE policies	
27	Jeff Bishop	Key Capture Energy	Written	Strategies	Microgrids	Hope micro projects will be supported as they will produce more citizen support for zero emissions future	
28	Floyd Vergara	National Biodiesel Board		TRPS	Biofuels	NOx: Further analysis of previously published data confirms that substituting biodiesel (BD) results in reduction not only in emissions concentration but in emissions rate. IMMEDIACY OF BD BENEFITS: Substitution of BD for fuel oil brings much quicker -- and hence more potent -- GHG reductions than continuing to use fuel oil while thermal electrification ramps up. "[A]n electrification only strategy is likely destined for failure. This is not because electricity is incompatible as an energy carrier in many applications, but rather the rate at which the state is proposing to deploy those solutions ... ." And the same temporal benefits extend to other emissions, including particulates, that have major health impacts. FUEL AND EQUIPMENT CERTIFICATION: "We firmly believe that the 'lack' of certification at the present time should not be a barrier for	DEEP appreciates these comments and feedback and will take them into account in future energy planning processes. DEEP supports a near-to-medium-term role for BD through a blending mandate. The agency has revised Part III to more fully address the issue of GHG emissions reductions and to reflect the Brookhaven National Lab analysis of the NOx issue that NBB provided in early 2021.

Comment No.	Commenter Name	Affiliation	Written/ Oral	Section	Subject	Comment Summary	DEEP Response
						increased Bioheat use in the near future."	
28	Dr. T. Butcher (Attachment B)	Brookhaven National Laboratory on behalf of National Biodiesel Board		TRPS	Biofuels	Most published studies on NOx emissions from biodiesel (BD) combustion report results only in terms of concentration, not rate. However, rate can be calculated from concentration using standard conversion procedure. Doing so for a range of studies generally indicates BD combustion results in lower emissions rate, relative to combustion of fuel oil (which is consistent with reported reductions in concentration). This is true even for an EPA study (Miller) that reported emissions rate. That report used incorrect data points that resulted in erroneously reporting an emissions rate higher than emissions from fuel oil combustion. Converting that study's concentration values to	

Comment No.	Commenter Name	Affiliation	Written/ Oral	Section	Subject	Comment Summary	DEEP Response
						rate values confirms a reduction in rate.	
28	Attachment A	National Biodiesel Board		TRPS	Biofuels	BD & NOX EMISSIONS IN HOME HEATING OIL EQUIPEMENT -- Using EPA protocol, 10 of 12 studies showed reduction in emissions rate (avg. ~5%). EMISSIONS BACKGROUND -- Because residential oil combustion emissions are not regulated, they are relatively poorly studied and using inconsistent methods. NBB regards Brookhaven NL as preeminent authority on fuel oil combustion. APPLICATION OF EPA METHOD F TO EXISTING STUDIES -- "Based on this new data presented in lbs/MMBTU ... NBB comes to the conclusion that, at a minimum, biodiesel NOx in existing systems can be considered the same or lower on average as conventional No. 2 fuel oil. This in in concert with the stated experience of the technical experts at Brookhaven National Laboratories. It follows,	DEEP appreciates these comments and feedback and will take them into account in future energy planning processes. The agency has revised Part III to more fully address the issue of GHG emissions reductions and to reflect the Brookhaven National Lab analysis of the NOx issue that NBB provided in early 2021.

Comment No.	Commenter Name	Affiliation	Written/ Oral	Section	Subject	Comment Summary	DEEP Response
						therefore, that for purposes of future considerations within the IRP, the comprehensive energy plans or other low carbon policies or efforts, biodiesel NOx emissions in home heating oil applications would not adversely affect the states ozone compliance status." NBB intends to sponsor no additional testing to quantify emissions. CONCLUSION -- "[T]aking into account the lower BTU of biodiesel and the presence of oxygen in the biodiesel, the values in lbs/MMBTU for biodiesel compared to No. 2 fuel oil in boiler applications tend to be more favorable for biodiesel than values reported in ppm concentrations." "While the existing data does vary, the preponderance of the existing data shows biodiesel NOx similar to or lower than that of No. 2 fuel oil, even when considering the lower BTU content of biodiesel."	
28	Attachment C	National Biodiesel Board		TRPS	Biofuels	[DEEP's own overview of published studies on NOx emissions]	n/a
28	Attachment D	National Biodiesel Board		TRPS	Biofuels	Combustion Performance of B-20 Biodiesel Blends in Residential Heating Appliances C.R. Krishna and Christopher Brown Brookhaven National Laboratory April 2014	n/a

Comment No.	Commenter Name	Affiliation	Written/ Oral	Section	Subject	Comment Summary	DEEP Response
28	Attachment F	National Biodiesel Board		TRPS	Biofuels	ASTM Standards and UL Acceptance -- NBB "[confident] that lack of current ASTM standards, UL listings, and equipment company support for higher blends should not be considered as a major factor limiting biodiesel's future growth in the heating oil sector." Responding here to DEEP request for details on approval procedures and timelines. Work on ASTM specs for B2-B5 and B6-B20 blends in heating oil began in 2001; B5 spec was issued in 2008; B6-20 spec approved in 2015. Work on UL protocol for B20 equipment began at that point, and "companies are now in the process of completing their formal listings for B20 in new equipment moving forward." This sets stage for B50 and B100 work, which is instigated in part by GHG emissions reduction targets set in CT and elsewhere in Northeast and in part by Providence Resolution in 2019 (dealers committed to 40% carbon reduction by 2030 and zero carbon by 2050). "NORA and NBB are accelerating the technical investment to shorten the time needed to secure the data for the ASTM specifications for B50 and B100 for heating oil, and plans are to begin balloting in 18-24 months with a target of ASTM standard passing in 2025 or earlier."	DEEP appreciates these comments and feedback and will take them into account in future energy planning processes. The agency has revised Part III to reflect the standards and certification timeline provided by NBB.

Comment No.	Commenter Name	Affiliation	Written/ Oral	Section	Subject	Comment Summary	DEEP Response
						Meanwhile, NORA has issued a Developmental Fuel Standard for B50 and B100. And discussions are underway with UL, with industry voices proposing a simplified process with minimal modifications beyond the B20 procedure. NBB's expectation is that UL coverage for B100 would come 6-12 months after ASTM standard passes (i.e., 2026 or earlier).	
28	Attachment E	National Biodiesel Board		TRPS	Biofuels	Health benefits -- "This document is a summary of upcoming reports that assesses the health benefits of substituting biodiesel in residential heating oil- and transportation-related sources currently fueled by conventional ultra-low sulfur diesel or distillate (ULSD or diesel fuel) in selected states on both coasts and Colorado." Using B100 in a Bronx housing development would --> $137 M in avoided costs within 5 miles. Extrapolating Albany results for B100 substitution [HEATING OIL?] to Port of NY/NJ --> $1.B in avoided cost. Study locations for heating oil: NYC, Albany, Boston,	DEEP appreciates these comments and feedback and will take them into account in future energy planning processes.

Comment No.	Commenter Name	Affiliation	Written/ Oral	Section	Subject	Comment Summary	DEEP Response
						New Haven, Providence (with focus on "disadvantaged communities near airports, ports, railyards, freight logistics facilities, agricultural operations, large cities, and residential complexes"). Economic impacts considered appear to be: premature mortality; asthma exacerbation; restricted activity days; and work loss days.	
29	Alicea Charamut	Rivers Alliance of Connecticut	Written	Strategies	Siting	Supports Strategy 10: Conduct a Stakeholder Process to Improve the Transparency, Predictability, and Efficiency of Solar Siting and Permitting. Would be pleased to participate	DEEP appreciates these comments welcomes participation in the solar siting and permitting process.
30	Francis Pullaro	RENEW Northeast	Written	Objective 1	100% Zero Carbon Target	Low-cost energy resources eligible under the RPS will enable CT to meet the goal and the Global Warming Solutions Act while providing local economic development benefits and increasing system reliability. However, there should be a 2030 interim target to ensure decarbonization goals are not delayed.	DEEP appreciates these comments and encourages the commenter to see Objective 4 for a discussion on the impact of fossil generators in environmental justice communities as well as additional discussion on siting constraints for new transmission from Canada; Objective 5 for a discussion on the potential use cases for energy storage resources; and Part II: Strategies for updates on the New England Energy Vision proceeding.
30	Francis Pullaro	RENEW Northeast	Written	Objective 4	Modeling	Though CT observes that 91% of load will be under long-term contract, this does not negate the existence of fossil generation that will have negative localized externalities.	
30	Francis Pullaro	RENEW Northeast	Written	Objective 1	Fossil resources	Connecticut must accelerate the retirement of polluting generators and replace them with flexible peaking capacity like storage	

Comment No.	Commenter Name	Affiliation	Written/ Oral	Section	Subject	Comment Summary	DEEP Response
30	Francis Pullaro	RENEW Northeast	Written	Strategies	Procurements	CT should not delay planned procurements for renewable energy solely based on the possibility of the region deciding to adopt a centralized procurement arrangement.	
30	Francis Pullaro	RENEW Northeast	Written	Strategies	Regional Planning	Supports DEEP's conclusion on the benefits of regional coordination on procurements for economies of scale.	
30	Francis Pullaro	RENEW Northeast	Written	Strategies	Procurements	Supports DEEP's intention to update its procurement schedule every 12 months.	
30	Francis Pullaro	RENEW Northeast	Written	Objective 5	Storage	Supports adding flexible resources to balance variable energy resources but this is a long-term need not short-term due to the low deployment of variable energy resources on the current system. The IRP seems to ignore the benefits of energy storage as the best choice to meet peak energy needs by focusing exclusively on its role in balancing variable energy resources. Connecticut should set an aggressive storage target to attain these benefits. Battery storage is already economic as shown by the 600 MW that cleared the FCA this year.	
30	Francis Pullaro	RENEW Northeast	Written	Strategies	Siting	Supports Strategy 10 and welcomes the opportunity. Connecticut should develop recommended guidance for municipalities on solar tax assessment valuations and agreements.	

Comment No.	Commenter Name	Affiliation	Written/ Oral	Section	Subject	Comment Summary	DEEP Response
30	Francis Pullaro	RENEW Northeast	Written	Objective 1	Hydropower	The IRP should make a recommendation to amend the Class I RPS to allow for greater inclusion of hydropower under 30 MW without regard to vintage.	
30	Francis Pullaro	RENEW Northeast	Written	Strategies	Markets	Strongly supports DEEP's commitment to attaining energy market reform. RENEW supports FCEM. However, RENEW observes that the region has not identified reliability criteria for balancing services over the long term with increasing variable energy resource penetration.	
30	Francis Pullaro	RENEW Northeast	Written	Strategies	Transmission Planning	Supports proactive scenario-based planning processes. Is concerned about the line in the IRP that says "New England currently has the convenience of time as new offshore wind resources are not needed to come online until the early 2030s."	
30	Francis Pullaro	RENEW Northeast	Written	Objective 1	Imports	Opposed to using Canadian hydropower to reduce the quantities of additional renewable resources and reserves needed to meet the target. There is a lack of verification mechanisms for imported generation sources and their environmental attributes. A study should be conducted to compare the value of foreign hydropower imports with the economic development and environmental benefits of developing the region's own renewable energy potential.	

Comment No.	Commenter Name	Affiliation	Written/ Oral	Section	Subject	Comment Summary	DEEP Response
31	Sarah Krame	Sierra Club	Written	Objective 1	100% Zero Carbon Target	Supports the recommendation to codify the 100% zero carbon electric supply target but should also require a 100% zero carbon in-state generation by 2040 to ensure the state is truly achieving GHG emissions reduction	DEEP appreciates these comments and will take them into account in future energy planning processes. DEEP encourages the commenter to see information about how DEEP modeled the Zero Carbon goal in Objective 1, and Objective 4 for added discussion on siting constraints related to hydroelectric transmission expansion.
31	Sarah Krame	Sierra Club	Written	Objective 1	Fossil resources	CT should enact a moratorium on new fossil gas generation in the state effective immediately. Provides narrative on how unnecessary Killingly is based on the ISO-NE surplus	
31	Sarah Krame	Sierra Club	Written	Strategies	Markets	Supports CT's efforts to push for reform of the wholesale markets	
31	Sarah Krame	Sierra Club	Written	Strategies	Procurements	CT should not wait to start procuring new clean generation and should start immediately in advance of Millstone's retirement	
31	Sarah Krame	Sierra Club	Written	Objective 1	Imports	CT cannot rely on additional hydroelectric imports to meet its 100% target, which would result in new impoundments, which are highly carbon intensive.	
31	Sarah Krame	Sierra Club	Written	TRPS	Thermal RPS	IRP correctly declines to implement a thermal RPS as it will support continued reliance on fossil fuel infrastructure.	
32	Peter Shattuck	Anbaric	Written	Objective 5	Transmission	Supports the IRP to focus on alleviating transmission constraints through competitive procurements and transmission planning or non-wires alternatives.	DEEP appreciates these comments and will take them into account in future energy planning processes.
32	Peter Shattuck	Anbaric	Written	Strategies	Procurements	Supports deeps near term procurement plan as outlined on page 152	

Comment No.	Commenter Name	Affiliation	Written/ Oral	Section	Subject	Comment Summary	DEEP Response
33	Charles Rothenberger	Save the Sound	Written	Objective 1	Modeling	Supports the multiple scenarios but should provide stakeholders with additional opportunities to review, propose changes, and propose alternatives.	DEEP appreciates these comments and encourages the commenter to see the summary of the procedural record added after the executive summary for an overview of the opportunities for public comment; Appendix 1, Objective 1 and Objective 5 for a discussion of how transmission was included in the modeling and its intention, as well as information on how energy storage was modeled and additional discussion on the role energy storage can play in the future; Appendix 6 and Objective 4 for discussion of an in-state carbon tax; and Strategy 5 for DEEP's approach to sequencing future clean energy procurements.
33	Charles Rothenberger	Save the Sound	Written	Objective 1	Discount Rates	IRP should use a risk-adjusted rate in order to fairly characterize the relative costs and benefits of disparate resources.	
33	Charles Rothenberger	Save the Sound	Written	Objective 2	Markets	The grid market system is not aligned with CT's policy goals and we should identify problems inherent in it.	
33	Charles Rothenberger	Save the Sound	Written	Objective 1	Reliability Modeling	DEEP allowed the model to put a "thumb on the scale" by assuming that fossil generation was the only economic resource for addressing extremes in peak demands.	
33	Charles Rothenberger	Save the Sound	Written	Objective 2	DERS (distributed solar)	Historical levels of distributed energy resource deployment are only a start. Distributed energy resources need market access.	
33	Charles Rothenberger	Save the Sound	Written	Objective 3	Affordability	Affordability is a priority and DEEP must balance low price, low cost and high value over the short and long term.	
33	Charles Rothenberger	Save the Sound	Written	Objective 5	Transmission Planning	Transmission upgrades should be explored but modeling tools must be able to simultaneously coordinate and optimize the trade-offs between utility scale generation and transmission and distribution infrastructure and distributed energy resources.	
33	Charles Rothenberger	Save the Sound	Written	Strategies	DERS (distributed solar)	Merely maintaining historic levels of distributed solar generation will fail to capture the full benefits of DERS and the modeling assumptions must recognize that	

Comment No.	Commenter Name	Affiliation	Written/ Oral	Section	Subject	Comment Summary	DEEP Response
						distributed energy resources often stimulate private investment that is better leverage than utility investment.	
33	Charles Rothenberger	Save the Sound	Written	Objective 1	Modeling-Transmission	The copper sheet model ignores the incremental nature of transmission constraint relief costs and precludes evaluation of opportunities to coordinate and optimize utility scale generation, transmission improvements, distributed energy resource deployment, and distribution infrastructure investments.	
33	Charles Rothenberger	Save the Sound	Written	IRP In General	Objectives	The goal should not be a compromising "balance" or trade-off between the goals of decarbonization, infrastructure investment, market reform, energy justice and others but a maximization of achieving all.	
33	Charles Rothenberger	Save the Sound	Written	Appendices	Carbon Tax	DEEP should consider a carbon tax mechanism and should evaluate reinvestment of carbon tax revenues into energy efficiency and local renewable energy resources. Supports a Mass.-style in-state carbon tax.	
33	Charles Rothenberger	Save the Sound	Written	Objective 1	100% Zero Carbon Target	Supports a 100% zero-carbon target in general but the goal must recognize the need to eliminate fossil-fuel and other combustion technologies within the state's borders and should not be met with RECS as a substitution.	

Comment No.	Commenter Name	Affiliation	Written/ Oral	Section	Subject	Comment Summary	DEEP Response
33	Charles Rothenberger	Save the Sound	Written	Strategies	Procurements	Need to start procuring clean energy as soon as possible because the sooner they are online, the greater the overall lifetime value of those resources become as they displace alternative fossil fuels.	
33	Charles Rothenberger	Save the Sound	Written	Strategies	Offshore Wind Siting	CT must act to ensure that CT takes advantage of economic development opportunities. Should also take advantage of the state's Commission on Environmental Standards to inform and guide the best practices for state-level procurements.	
33	Charles Rothenberger	Save the Sound	Written	Objective 5	Energy Efficiency, Demand Response, Storage	Supports IRP's emphasis on the importance of improving and expanding the state's energy efficiency programs and the development of innovative demand response strategies.	
33	Charles Rothenberger	Save the Sound	Written	Objective 6	Waste to Energy	Opposes the IRP's lack of urgency with respect to solving the state's solid waste issue in a manner that allows for the retirement of waste to energy facilities.	
33	Charles Rothenberger	Save the Sound	Written	Objective 6	Anaerobic Digestion	Supports anaerobic digesters' ability to displace the need for waste to energy but is concerned about potential waste and environmental impacts of fugitive emissions from the current gas pipeline infrastructure. Urges use of renewable natural gas to be limited to on-site co-located uses	
33	Charles Rothenberger	Save the Sound	Written	Strategies	Biomass	IRP should eliminate biomass from Class I RPS category not just phasedown.	

Comment No.	Commenter Name	Affiliation	Written/ Oral	Section	Subject	Comment Summary	DEEP Response
33	Charles Rothenberger	Save the Sound	Written	TRPS	Recommend ations	supports the analysis, conclusions, and recommendations of the IRP with respect to a TRPS	
34	Frank Wolak	FuelCell Energy, Inc.	Written	IRP In General	Fuel Cells	The emergence of, and greater need for hydrogen technology in the electric generation mix and the economic merits of Connecticut's existing hydrogen technology industry are unaddressed.	DEEP appreciates these comments and will take them into account in future energy planning processes. DEEP also encourages the commenter to see Objective 5 for the Department's current position on hydrogen, and welcomes the commenter's participation in the forthcoming siting and permitting proceeding outlined by Strategy 10.
33	Frank Wolak	FuelCell Energy, Inc.	Written	TRPS	CHP	The Thermal Portfolio Standard considered in Section III should recognize combined heat and power resources.	
33	Frank Wolak	FuelCell Energy, Inc.	Written	Strategies	RPS	The behind the meter RPS noted in Strategies Number 8 should be left as is.	
33	Frank Wolak	FuelCell Energy, Inc.	Written	Strategies	Zero Carbon Policy	Assure that policies that advocate for zero-carbon energy not fail to take into account the other important policy goals of the state, such as economic development, energy strategy for grid reliability and resiliency, or land use.	
35	M Trahan	SolarConnecticut	Written	IRP In General	DERs (distributed solar)	Draft IRP expresses a clear but unsubstantiated preference for grid-scale over distributed in-state solar; IRP minimizes in-state solar contribution to Connecticut's energy future and its benefits for the environment, public health, and the economy (specifically job creation).	DEEP appreciates these comments and will take them into account in future energy planning processes. DEEP also encourages the commenter to see Appendix 1 for more information on how behind-the-meter solar was incorporated into the modeling and Objective 3 for a discussion of the benefits for low-income communities
35	M Trahan	SolarConnecticut	Written	IRP In General	DERs (distributed solar)	Final IRP should inject view from pro-DG community and/or a neutral source.	

Comment No.	Commenter Name	Affiliation	Written/ Oral	Section	Subject	Comment Summary	DEEP Response
35	M Trahan	SolarConnecticut	Written	Objective 1	Modeling	Model does not capture total costs and benefits of distributed energy resources and has been discredited by PURA; one model alone is insufficient to inform a state energy plan; modeling perspective is focused solely on cost, not cost/benefit.	
35	M Trahan	SolarConnecticut	Written	Objective 1	Modeling	DEEP should pay attention to model described in "Doubling Down on a Centralized Grid Is More Expansive Without Distributed Energy" for its "least-cost development plan" that incorporates local solar into grid and system planning.	
35	M Trahan	SolarConnecticut	Written	Objective 4	Optimal siting	DEEP balances the importance of distributed energy resource against endangering natural resources	
35	M Trahan	SolarConnecticut	Written	Strategies	Solar siting	Expanding state role in solar siting will not benefit process; there is more than enough regulation to properly site solar in Connecticut	
35	M Trahan	SolarConnecticut	Written	Technical Meetings	Responses	Found that vendor's [consultant's] answers to some questions were unsatisfactory, especially with regard to costs of distributed generation vs. central power stations	
36	Brian Stewart	Citizen	Written	IRP In General	Structure	The IRP is organized in a way that defies easy access by those not already fully engaged in the project. This structure serves as a barrier to citizen engagement.	DEEP appreciates these comments and will take them into account in future energy planning processes. DEEP also encourages the commenter to see the summary of procedural record and public engagement added following the Executive Summary; Strategy 5 for a description of the
36	Brian Stewart	Citizen	Written	IRP In General	Public engagement	IRP should address the role the DEEP can play in creating opportunities for public engagement.	

Comment No.	Commenter Name	Affiliation	Written/ Oral	Section	Subject	Comment Summary	DEEP Response
36	Brian Stewart	Citizen	Written	IRP In General	Consumer benefit	Caution against emphasis on maximizing consumer benefits in the short-term as this tends to override goals of pollution reduction or climate action: instead move rapidly to zero GHG emissions, while accomplishing the other goals to the extent they are consistent with that principal goal.	Department's approach to sequencing procurements of clean energy resources; Strategy 2 for an update on the New England Energy Vision process; and Objective 3 for an overview of various program developments and steps the Department has taken to advance energy equity.
36	Brian Stewart	Citizen	Written	Strategies	Governance reform	The IRP should break the DEEP out of its silo and propose mechanisms whereby different agencies can align their actions to work in concert toward the goal; draft IRP appropriately and repeatedly names ISO-NE as one of principal structure impediments to energy reform.	
36	Brian Stewart	Citizen	Written	Objective 3	Energy equity	Draft IRP properly considers energy equity as an important principals; it would be valuable if IRP directly addressed specific programs that can be created or scaled up to reduce emissions while benefitting vulnerable communities.	
36	Brian Stewart	Citizen	Written	Strategies	Demand reduction	Goal of 2040 grid decarbonization cannot be achieved without combination of renewable energy and demand reduction; would like to see final IRP reflect that maintaining current levels of consumption will likely doom decarbonization efforts.	
37	Michael Harris	Citizen	Written	IRP In General	Structure	IRP poorly organized, making it difficult to review and analyze. Presented conflicting perspectives	DEEP appreciates these comments and will take them into

Comment No.	Commenter Name	Affiliation	Written/ Oral	Section	Subject	Comment Summary	DEEP Response
						and weak support for measures to address the climate crisis.	account in future energy planning processes.
37	Michael Harris	Citizen	Written	Objective 2	Natural Gas Reliance	Amplify criticisms ISO-NE regarding deficiency of market to support decarbonizing the grid; note Killingly plant in direct conflict with GHG reduction goals.	
38	Elias Petersen	Kolmar Americas, Inc. and American GreenFuels, LLC	Written	TRPS	Biofuels	Appreciate DEEP's acknowledgement that biodiesel can efficiently reduce GHG emissions in the heating sector.	DEEP appreciates these comments and feedback and will take them into account in future energy planning processes. The agency has revised Part III to: more fully address the issue of GHG emissions reductions; reflect the Brookhaven National Lab analysis of the NOx issue that NBB provided in early 2021; and reflect the standards and certification timeline provided by NBB.
38	Elias Petersen	Kolmar Americas, Inc. and American GreenFuels, LLC	Written	TRPS	Emissions accounting	Encourage DEEP to revise NOx analysis, embrace climate change and respiratory health benefits of biodiesel; encourage DEEP to review time-value benefits of contemporary GHG emissions reductions via biodiesel blending vs. future GHG emissions reductions via electrification.	
38	Elias Petersen	Kolmar Americas, Inc. and American GreenFuels, LLC	Written	TRPS	Biofuels	Encourage DEEP to review industry potential to rapidly achieve higher biodiesel blends.	
39	Connecticut Municipal Energy Cooperative	Connecticut Municipal Energy Cooperative	Written	Strategies	Market Reform	The most measured, transparent and prudent approach to Executive Order No. 3 is to focus primary efforts on reforming the ISO-NE markets in order to allow for the development and entry of new generation resources. Strongly supports.	DEEP appreciates these comments and will take them into account in future energy planning processes.

Comment No.	Commenter Name	Affiliation	Written/ Oral	Section	Subject	Comment Summary	DEEP Response
39	Connecticut Municipal Energy Cooperative	Connecticut Municipal Energy Cooperative	Written	Strategies	Municipal Energy Utilities	CMEEC and the MEUs should retain autonomy in addressing decarbonization while reporting annually on their progress. We simply do not have the rate base of an IOU over which we can socialize such robust power purchase agreements, nor would such mandates facilitate effective execution and leverage of insights available to locally-run municipal electric utilities who work together cooperatively to provide reliable, low-cost electric service.	
39	Connecticut Municipal Energy Cooperative	Connecticut Municipal Energy Cooperative	Written	Objective 5	Transmission	The call for large-scale transmission upgrades is therefore appropriate because as generation and transmission technologies continue to evolve, and the need for accommodating an increasing variety of ramping, inertia, balancing and other physical and operational parameters and characteristics needed to meet NERC and NPCC reliability standards will only grow more complex. it is preferable to first identify the probable locations of generation resource technologies that will be featured most prominently upon a full reformation of the wholesale markets and the relevant load centers to which their output must be delivered.	
40	Lynne Bonnett	Citizen	Written	Objective 2	Ratepayer impacts	Appreciate discussion of ratepayer impacts of ISO-NE market design, specifically overreliance on natural gas	DEEP appreciates these comments and will take them into account in future energy planning processes.

Comment No.	Commenter Name	Affiliation	Written/ Oral	Section	Subject	Comment Summary	DEEP Response
40	Lynne Bonnett	Citizen	Written	Objective 4	Solar siting	New Haven renters have been disadvantaged by rules, regulations preventing small scale solar sharing; SCEF program invests in large projects located far from where power is needed	
40	Lynne Bonnett	Citizen	Written	Objective 5	Solar Siting	Siting should be done in a way that benefits urban residents and provides power where it is needed (preferably behind the meter); Aggregated rooftop solar facilities could better serve our community.	
41	Amy McLean	Acadia Center	Written	Strategies	EE, Weatherization, Electrification	Support continued C&LM funding with recommendation 2022-24 plan develops more robust, whole-home weatherization, appliance replacement and efficient thermal programs (beyond LED upgrades) to reduce overall building electrification costs.	DEEP appreciates these comments and encourages the commenter to see the discussion added to Objective 4 on the expansion of transmission of hydroelectric energy from Canada; Objective 4 for discussion on siting impacts on environmental justice communities; Objective 3 for an overview of steps the Department has and is taking to address energy equity; and Strategy 2 for updates on the New England Energy Vision proceeding. In regards to numeric data, preparing the extensive data for public consumption will require significant time and resources that are outside of the scope of funding and work contracted for this IRP. DEEP will include this data availability as a requirement in future plans and scopes of work.
41	Amy McLean	Acadia Center	Written	Strategies	EE, Weatherization, Electrification	Recommendation for DEEP authority to procure energy efficiency and demand response that complements existing C&LM programs merits further consideration in Energy Efficiency Board process.	
41	Amy McLean	Acadia Center	Written	Strategies	EE, Weatherization, Electrification	Recommendation that C&LM Plan program administrators increase heat pump incentives	
41	Amy McLean	Acadia Center	Written	Strategies	Legislation	Support passing legislation to enact statutory requirement for the state to meet 2040 zero carbon electric goal; inclusion of	

Comment No.	Commenter Name	Affiliation	Written/ Oral	Section	Subject	Comment Summary	DEEP Response
						municipal energy cooperatives' reporting in zero carbon target	
41	Amy McLean	Acadia Center	Written	Strategies	Solar siting	Support DEEP's attention to developing appropriate solar siting opportunities in-state with attention to variable environmental and land-use impacts. Supports efforts to prioritize brownfield sites and implement pre-screening process.	
41	Amy McLean	Acadia Center	Written	Strategies	Solar siting	Recommend using recent state and regional efforts to address appropriate solar siting to guide next steps.	
41	Amy McLean	Acadia Center	Written	Strategies	Markets	Strongly support proposed regional electricity market reforms based on principles in New England Energy Vision Statement; urge DEEP to push for incorporation of equity and environmental justice principles in these reforms	
41	Amy McLean	Acadia Center	Written	Strategies	Biomass phasedown	Biomass should be excluded as zero carbon resource.	
41	Amy McLean	Acadia Center	Written	TRPS	Biofuels	Supports determination that T-RPS supporting biodiesel would exacerbate air pollution, continue fossil fuel reliance; share DEEP concerns about waste grease biodiesel feedstock availability.	
41	Amy McLean	Acadia Center	Written	Objective 1	Millstone	Supports continued reliance on Millstone during current contract if safely operated and cost-competitive without additional subsidy	
41	Amy McLean	Acadia Center	Written	Objective 1	Millstone	Concerned draft IRP does not consider possibility of prolonged	

Comment No.	Commenter Name	Affiliation	Written/ Oral	Section	Subject	Comment Summary	DEEP Response
						outage at Millstone, its effect on decarbonization goals.	
41	Amy McLean	Acadia Center	Written	Objective 1	Hydropower	Applaud focus on environmental justice communities in CT and First Nations in Canada.	
41	Amy McLean	Acadia Center	Written	Objective 1	Hydropower	Ask DEEP to recommend Hydro Quebec provide real-time emission data tracking.	
41	Amy McLean	Acadia Center	Written	Objective 1	Hydropower	Draft IRP does not appropriately consider scale of imports needed, interstate competition for resources nor transmission infrastructure needs and challenges.	
41	Amy McLean	Acadia Center	Written	Objective 1	Hydropower	Does not support policies that would encourage build-out of Canadian hydroelectric dams.	
41	Amy McLean	Acadia Center	Written	Objective 1	Modeling	Draft IRP should have explored possibility of more aggressive emissions reductions by neighboring states as key uncertainty, especially with respect to out-of-state gas availability, and the effects of intermittent resources on the regional grid.	
41	Amy McLean	Acadia Center	Written	Objective 1	Modeling	Draft IRP underestimates potential electricity load factors from increased electrification in transportation sector and thermal uses which may misrepresent future peak demand.	
41	Amy McLean	Acadia Center	Written	Objective 1	Natural gas	Ask DEEP to reconsider any future scenarios that allow for CT gas generation past 2040, whether for export or in-state consumption.	
41	Amy McLean	Acadia Center	Written	Objective 1	Natural gas	Final IRP should consider addressing environmental health concerns of communities where	

Comment No.	Commenter Name	Affiliation	Written/ Oral	Section	Subject	Comment Summary	DEEP Response
						gas power infrastructure is located and/or planned.	
41	Amy McLean	Acadia Center	Written	Objective 6	WTE	DEEP should work to minimize role of waste to energy facilities in energy future towards complete phase-out.	
41	Amy McLean	Acadia Center	Written	IRP In General	Data	Request DEEP make numeric data behind IRP and appendices available (preferably online in Excel format) for further analysis.	
42	ISO New England	ISO New England	Written	Objective 2	Markets	The wholesale markets have achieved their goal of valuing efficiency, resource-neutrality and reliability at least cost. The "pay twice" problem is mitigated by the "several hundred megawatts of renewable energy procured by the states (to date, mostly in the form of solar energy and some wind power), have actually received credit in the capacity market through an exemption to the MOPR that has been in place for the FCAs through 2021." The idea that there is excess capacity does not reflect the fact that the renewable resources are variable and are impacted by weather. Markets have brought forward lower-emitting sources of energy and ensure reliability at a cost-effective price.	DEEP appreciates these comments and will take them into account in future energy planning processes.
42	ISO New England	ISO New England	Written	Objective 2	Market Reform	Agrees with CT's preference for a wholesale market solution to the challenges related to state sponsored resources. ISO is planning to conduct analysis of several potential market pathways suggested by the states	

Comment No.	Commenter Name	Affiliation	Written/ Oral	Section	Subject	Comment Summary	DEEP Response
						such as pricing carbon but the states do not want to "explore this option."	
43	Nathan Hebel	ReEnegy Holdings LLC	Written	Strategies	Biomass phasedown	Draft IRP attempts to identify which facilities are exempt from gradual phasedown in CGS Sec 16-245a(g).	DEEP appreciates these comments and has made relevant changes to Objective 6 and Strategy 14 in response.
43	Nathan Hebel	ReEnegy Holdings LLC	Written	Objective 4	Biomass phasedown	IRP is not the proper venue to determine which facilities meet the criteria for exemption; suggest final IRP simply refer to any biomass facility that meets exemptions provided in CGS 16-245a(g).	
44	Operation Fuel, Inc.	Operation Fuel, Inc.	Written	Objective 3	Affordability	Considering DEEP's increasing prioritization and discussion of environmental justice, we encourage the agency to clarify and adopt a standard definition of how the agency seeks to redress decades of structural racism that has burdened our state's lowest income communities with pollution and precluded vulnerable citizens from opportunities.	DEEP appreciates these comments and encourages the commenter to see changes made to Objectives 3 and 4 which further highlight energy equity issues and summarize recent action taken by the Department and other state agencies and partners to address energy equity in Connecticut. Additionally, please see the new Appendix 8 which now serves as a glossary with definitions for acronyms.
44	Operation Fuel, Inc.	Operation Fuel, Inc.	Written	Objective 3	Environmental Justice	Centering the IRP in environmental justice concepts requires embedding the principles of equity and inclusion into all decisions and plans the agency makes. We encourage the state of Connecticut to invest in long term strategies to build power for traditionally marginalized and segregated communities.	

Comment No.	Commenter Name	Affiliation	Written/ Oral	Section	Subject	Comment Summary	DEEP Response
44	Operation Fuel, Inc.	Operation Fuel, Inc.	Written	Objective 3	Energy Equity	20-30% of low-to-moderate income ratepayers cannot adopt energy efficiencies because of hazards in the home, yet the current system relies on low-to-moderate income ratepayers to contribute to the efficiency funds without the opportunity to benefit from the investments. DEEP should identify opportunities to address the regressive subsidization policy that drives low-to-moderate income families into increasing debt, poor health, and housing insecurity.	
44	Operation Fuel, Inc.	Operation Fuel, Inc.	Written	IRP In General	Public Engagement	We encourage DEEP to engage stakeholders by listening to their priorities and lived experiences, in addition to sharing details of the IRP components and strategy with the public. We support quality, culturally appropriate, regularly updated, accessible, and assessable Climate change education for students in CT. Additionally the agency would benefit from senior staff with specific training and expertise in public engagement, meeting facilitation, and user-friendly communications. The IRP includes a list of acronyms for reference. We recommend adding to this the definitions for these terms, not just their abbreviations.	

Comment No.	Commenter Name	Affiliation	Written/ Oral	Section	Subject	Comment Summary	DEEP Response
44	Operation Fuel, Inc.	Operation Fuel, Inc.	Written	Objective 1	Zero Carbon Target	Operation Fuel heartily endorses that "Connecticut should codify the requirement to achieve a 100 percent zero carbon electric supply by 2040" (p. 8). We should also develop a plan to reduce instate electricity generation to be zero carbon by 2040.	
44	Operation Fuel, Inc.	Operation Fuel, Inc.	Written	Objective 2	Market Reform	Encourages DEEP to pursue reforms at ISO-NE and the Forward Capacity Markets, representing CT ratepayers who are currently unfairly shouldering the region's energy costs.	
44	Operation Fuel, Inc.	Operation Fuel, Inc.	Written	Objective 6	WTE	It is urgent that the IRP go beyond acknowledging the possibility of operations ceasing in 2022, and instead plan for that imminent (particularly by the timelines of climate planning) reality. We are very concerned that DEEP is even suggesting that the plant will continue burning trash in an EJC where asthma rates have surpassed the national average for decades. The IRP should lay out a waste management plan acknowledging clearly that the plant will close.	
45	Christian Herb	Connecticut Energy Marketers Association	Written	TRPS	Biofuels	BD has an essential role to play in decarbonizing the thermal sector. It is readily available, rapidly scalable, and essentially cost-free. DEEP's concern about NOx emissions is ill-founded. Wide use of BD would enhance CT's energy security. Cost to electricity ratepayers would be de minimis.	DEEP appreciates these comments and feedback and will take them into account in future energy planning processes. The agency has revised Part III to: more fully address the issue of GHG emissions reductions; reflect the Brookhaven National Lab analysis of the NOx issue that NBB

Comment No.	Commenter Name	Affiliation	Written/ Oral	Section	Subject	Comment Summary	DEEP Response
45	Christian Herb	Connecticut Energy Marketers Association	Written	TRPS	ASHPs	ASHPs and (in-state) clean electricity cannot be deployed fast enough or extensively enough to meet GHG goals. Vast impact on winter peak demand, electricity grid, and ratepayer costs. Very costly to install, esp. in homes requiring upgrades and heat-delivery conversions. Wind and solar to support HPs are acreage-intensive. Like natural gas expansion, ASHPs are a bridge to nowhere -- and jeopardizes CT's energy security.	provided in early 2021; and reflect the standards and certification timeline provided by NBB. The agency recognizes that all renewable thermal technologies involve workforce protection and workforce development potential. DEEP will address economic development and workforce impacts more fully as it comprehensively develops building-sector decarbonization approaches in the CES.
45	Christian Herb	Connecticut Energy Marketers Association	Written	TRPS	Workforce Development	"A thermal program that includes biodiesel will help maintain the 13,000 well-paying jobs that the liquid fuels industry supports."	
46	Denise Savageau	Audubon Connecticut, Connecticut Association of Conservation Districts, Connecticut Forest & Park Association, Connecticut Land Conservation Council, Rivers Alliance of Connecticut, The Nature Conservancy in CT, Working Lands Alliance	Written	Objective 1	Zero Carbon Target	We fully support the adoption of a statutory target of zero carbon emissions for the electricity grid by 2040.	DEEP appreciates these comments and will take them into account in future energy planning processes. DEEP encourages the commenters to participate in the forthcoming siting process laid out by Strategy 10 and to these comments into that record when it is available.

Comment No.	Commenter Name	Affiliation	Written/ Oral	Section	Subject	Comment Summary	DEEP Response
46	Denise Savageau	Audubon Connecticut, Connecticut Association of Conservation Districts, Connecticut Forest & Park Association, Connecticut Land Conservation Council, Rivers Alliance of Connecticut, The Nature Conservancy in CT, Working Lands Alliance	Written	Objective 1	Renewables	IRP should recommend a working group be formed to review the current status of utility scale resources and distributed energy resource resources and determine the appropriate mix; a greater understanding of the size and need for utility scale resources is needed to ensure proper siting, as it a greater understanding of the carbon benefits of working and natural lands	
46	Denise Savageau	Audubon Connecticut, Connecticut Association of Conservation Districts, Connecticut Forest & Park Association, Connecticut Land Conservation Council, Rivers Alliance of Connecticut, The Nature Conservancy in CT, Working Lands Alliance	Written	Objective 4	Siting	Proper siting of utility scale resources depend on proper planning based on guidance documents that recognize the value of ecosystem services provided by working and natural lands and avoidance of areas unsuitable for development	

Comment No.	Commenter Name	Affiliation	Written/ Oral	Section	Subject	Comment Summary	DEEP Response
46	Denise Savageau	Audubon Connecticut, Connecticut Association of Conservation Districts, Connecticut Forest & Park Association, Connecticut Land Conservation Council, Rivers Alliance of Connecticut, The Nature Conservancy in CT, Working Lands Alliance	Written	Objective 4	Siting	Reference comment in GC3 report recommending 1) adopt land use policies for siting energy infrastructure that avoid lost of forests, farmlands, other lands where recognize ecosystem services, 2) important large-scale solar development not supersede climate change strategies including carbon sequestration, 3) state should establish incentives for siting on brownfields and other developed spaces	
46	Denise Savageau	Audubon Connecticut, Connecticut Association of Conservation Districts, Connecticut Forest & Park Association, Connecticut Land Conservation Council, Rivers Alliance of Connecticut, The Nature Conservancy in CT, Working Lands Alliance	Written	Strategies	Solar siting	We support convening a stakeholder group that includes representatives of the environmental community that understand the values of ecosystem services to improve the solar siting and permitting process in Connecticut	

Comment No.	Commenter Name	Affiliation	Written/ Oral	Section	Subject	Comment Summary	DEEP Response
46	Denise Savageau	Audubon Connecticut, Connecticut Association of Conservation Districts, Connecticut Forest & Park Association, Connecticut Land Conservation Council, Rivers Alliance of Connecticut, The Nature Conservancy in CT, Working Lands Alliance	Written	Strategies	Solar siting	We strongly recommend that full reports by GC3 Working and Natural Lands subgroups be utilized to inform stakeholder process	
46	Denise Savageau	Audubon Connecticut, Connecticut Association of Conservation Districts, Connecticut Forest & Park Association, Connecticut Land Conservation Council, Rivers Alliance of Connecticut, The Nature Conservancy in CT, Working Lands Alliance	Written	Strategies	Solar siting	We support an inclusive and deliberative process to develop policy, but recognize this takes time therefore recommend adopting interim siting guidance adopted immediately	

Comment No.	Commenter Name	Affiliation	Written/ Oral	Section	Subject	Comment Summary	DEEP Response
46	Denise Savageau	Audubon Connecticut, Connecticut Association of Conservation Districts, Connecticut Forest & Park Association, Connecticut Land Conservation Council, Rivers Alliance of Connecticut, The Nature Conservancy in CT, Working Lands Alliance	Written	Objective 6	Land use value	Draft IRP does not mention land use value other than in context of solar siting; Objective 6 would be the precise spot to include the important role of working and natural lands and how ecosystem services are necessary for implementing climate change policies identified in draft IRP and GC3 Phase I report	
47	Len Greene	FirstLight Power	Written	Objective 1	Zero Carbon Target	Support DEEP efforts to decarbonize electric sector; agree that codifying state goal is both appropriate and achievable and believe there is significant opportunity to expand state's zero carbon resources	DEEP appreciates these comments and encourages the commenter to see Objective 5 for added discussion of grid security and resiliency, as well as discussion on the potential for energy storage to help serve peak loads. Additionally, please see Strategy 16 for DEEP's recommendation regarding resilience and microgrids.
47	Len Greene	FirstLight Power	Written	Objective 1	Zero carbon resources	Supports state and regional efforts to expand solar and offshore wind resources while recognizing need for other clean resources, balancing and storage to achieve integrated and reliable clean grid	
47	Len Greene	FirstLight Power	Written	Objective 1	Zero carbon resources	Urge Connecticut and region to focus on equitable compensation to existing zero carbon and storage resources for reliability, resilience, and environmental value	

Comment No.	Commenter Name	Affiliation	Written/ Oral	Section	Subject	Comment Summary	DEEP Response
47	Len Greene	FirstLight Power	Written	Strategies	Markets	Hope regional efforts to integrate clean energy considerations into wholesale electric market will be properly reflected through FCEM design that accounts for time-differentiated values	
47	Len Greene	FirstLight Power	Written	Strategies	Markets	Draft IRP puts comparatively little emphasis on disincentive for fossil retirement in its discussion of market design flaws; encourage Connecticut and other New England states to put greater emphasis on restoring meaningful retirement signal in market reform efforts to efficiently achieve state policy goals	
47	Len Greene	FirstLight Power	Written	Strategies	Procurements	Time-differentiated value of resources (not accounted for in current market structure) can be realized by Connecticut consumers by extending programs and procurements to existing large-scale electric storage	
47	Len Greene	FirstLight Power	Written	Objective 5	Storage	Agree that electric storage needed to "reduce and manage load to balance variable energy resources"	
47	Len Greene	FirstLight Power	Written		Storage	Suggestion of pilot program to replace fossil peaking units with storage and local hydropower to enhance clean reliability and flexible dispatch	
47	Len Greene	FirstLight Power	Written	Strategies	Zero Carbon Target	Recommend Connecticut consider options to assist municipal electric cooperatives decarbonize their territories; may benefit from examining recent legislation passed in Massachusetts	

Comment No.	Commenter Name	Affiliation	Written/ Oral	Section	Subject	Comment Summary	DEEP Response
48	Jack Brouwer	National Fuel Cell Research Center	Written	Strategies	Resilience	IRP should consider resilience as a strategy requiring a separate set of actions from those of reliability.	DEEP appreciates these comments and encourages the commenter to see the added discussion on grid security, resiliency, and microgrids in Objective 5. A discussion on renewable hydrogen can also be found in Objective 5.
48	Jack Brouwer	National Fuel Cell Research Center	Written	Strategies	Fuel Cells	IRP should strengthen air quality policy in addition to carbon reduction policy by siting fuel cell systems both behind the meter and in front of the meter.	
48	Jack Brouwer	National Fuel Cell Research Center	Written	Strategies	Microgrids	IRP should include a new section on microgrids as a resiliency strategy to meet EO3. CT must include microgrids in the IRP to ensure resilience at both the customer, community and regional levels.	
48	Jack Brouwer	National Fuel Cell Research Center	Written	Strategies	Renewable Hydrogen	Provided examples on the benefits and opportunities of renewable hydrogen resources.	
49	Jordan Garfinkle	Bloom Energy Corporation	Written	IRP In General	Resiliency	IRP acknowledges but fails to adequately value resilience	DEEP appreciates these comments and encourages the commenter to see the added discussion of grid security, resiliency and microgrids to Objective 5, and to see Objective 4 for discussion of health impacts to environmental justice communities caused by siting of polluting generators. DEEP will take these comments into consideration in future energy planning processes
49	Jordan Garfinkle	Bloom Energy Corporation	Written	Strategies	DG programs	Imperative that existing programs like LREC/ZREC not be discontinued until there is a successor program to support key investments in community resilience, climate adaptation (also note these programs have appropriately valued resiliency benefits)	
49	Jordan Garfinkle	Bloom Energy Corporation	Written	Strategies	DERs	Strongly recommend no lapse in policy support for non-combustion fuel cells and fuel cell-powered microgrids	
49	Jordan Garfinkle	Bloom Energy Corporation	Written	Strategies	DERs	DERs particularly valuable if avoid local air pollution especially in vulnerable communities; health benefits of emissions reductions cannot be overstated	

Comment No.	Commenter Name	Affiliation	Written/ Oral	Section	Subject	Comment Summary	DEEP Response
49	Jordan Garfinkle	Bloom Energy Corporation	Written	Strategies	DERs	Must be primary objective DEEP ensure benefits distributed evenly in strategies for deep decarbonization; specifically caution that focus on electric grid may inadvertently protect diesel back-up generators	
49	Jordan Garfinkle	Bloom Energy Corporation	Written	Strategies	Hydrogen	DEEP should go beyond monitoring trends, aggressively support technologies that are enabling hydrogen transition today	
50	Glen Reed and Dan Mellinger	Energy Efficiency Board of Connecticut	Written	Objective 1	Energy Efficiency	Various issues with ISO-NE CELT forecast used to predict future energy efficiency levels: 1) Assumption that new annual energy efficiency amounts will decrease precipitously is inconsistent with IRP objective to prioritize energy efficiency and numerous sections of the document, 2) the comparison of the ISO-NE CELT with NYISO Gold Book energy efficiency forecast based on percent growth is misleading because of difference in timelines, 3) ISO-NE forecasts underestimate energy efficiency savings potential and assumes dramatically increased costs for energy efficiency.	DEEP appreciates these comments and will take them into account in future energy planning processes. DEEP also encourages the commenter to see the procedural record added after the Executive summary that summarizes opportunity to comment on the inputs and assumptions.
50	Glen Reed and Dan Mellinger	Energy Efficiency Board of Connecticut	Written	Objective 1	Energy Efficiency	Appears energy efficiency levels are not varied in base load case despite modeling several scenarios which reflect higher energy efficiency (assuming energy efficiency included in category "least cost resources"); ask why is a higher level of energy	

Comment No.	Commenter Name	Affiliation	Written/ Oral	Section	Subject	Comment Summary	DEEP Response
						efficiency not modeled in other scenarios?	
50	Glen Reed and Dan Mellinger	Energy Efficiency Board of Connecticut	Written	Objective 1	Energy Efficiency	Appears energy efficiency level in electrification load case only increased with associated increase ASHP/weatherization; ask why higher level energy efficiency not modeled in association with EV charging, heat pump water heaters, and other increases in electrification?	
50	Glen Reed and Dan Mellinger	Energy Efficiency Board of Connecticut	Written	Objective 1	Energy Efficiency	Reference "energy efficiency emphasis" scenario mentioned in 02/24/2020 memo; why is this scenario not included in draft IRP?	
50	Glen Reed and Dan Mellinger	Energy Efficiency Board of Connecticut	Written	Appendix A	Figure 3	"Annual Energy" label used in Figure 3 misleading because the data represents cumulative savings	
51	New England Power Generators Association	New England Power Generators Association	Written	Objective 2	Markets	Provided multiple statistics about the benefits of markets. Markets have shielded consumers from the risk of poor investment decision. Recognizes CT seeks a new wholesale market design that better aligns the state's clean energy needs and emissions reduction mandates.	DEEP appreciates these comments and will take them into account in future planning processes. DEEP also encourages the commenter to see the discussion taking place in the New England Energy Visions proceeding, as described by Strategy 2.
51	New England Power Generators Association	New England Power Generators Association	Written	Objective 2	Market Reform	Supports a carbon price as a starting point for further discussions. Market design should meaningfully value carbon to help states meet their GHG emission reduction mandates and support long-term investment in low-and-zero-carbon technologies. Market reform must also ensure the retention	

Comment No.	Commenter Name	Affiliation	Written/ Oral	Section	Subject	Comment Summary	DEEP Response
						and development of a range of reliability products and services.	
52	Susan E. Bruce	Kimberly-Clark Corporation	Written	Objective 6	CHP	Optimizing Connecticut's existing combined heat and power resources effective tool to balance and advance compelling public policy interests	DEEP appreciates these comments and will take them into account in future energy planning processes.
52	Susan E. Bruce	Kimberly-Clark Corporation	Written	IRP In General	CHP	Urge Department to consider integrating combined heat and power into IRP in a deliberate and thoughtful manner that reflects a sense of urgency in addressing combined heat and power issues (recent Class III REC price decline)	
52	Susan E. Bruce	Kimberly-Clark Corporation	Written	Strategies	Class III RPS	Recommends Department modernize Class III RPS; one such approach to modestly increase standard over time to ensure combined heat and power resources can be maintained and expanded	
53	Matt Macunas	Connecticut Green Bank	Written	Objective 1	Zero Carbon Target	The Green Bank agrees with and supports DEEP's determinations arrived at through the IRP's analysis of decarbonization pathways.	DEEP appreciates these comments and will take them into account in future energy planning processes. Additionally DEEP encourages the commenter to see clarifying edits corresponding to the page- and figure-specific recommendations throughout.
53	Matt Macunas	Connecticut Green Bank	Written	Strategies	BTM Solar	Supports DEEP's perspectives on supporting a steady-state of market activity that facilitates the sustained, orderly development of a local installer industry, in part through the structure of a successor compensation tariff. The recommendation for no less than 50 MW of annual project deployment is reasonable and roughly matches the historical annual deployment rate for project activity within the existing,	

Comment No.	Commenter Name	Affiliation	Written/ Oral	Section	Subject	Comment Summary	DEEP Response
						Green Bank-administered Residential Solar Investment Program ("RSIP"). Also supports DEEP's prioritization of low-to-moderate income populations	
53	Matt Macunas	Connecticut Green Bank	Written	Strategies	BTM Solar	Pages 155-156 – On addressing the impact behind the meter resources have on reducing overall RPS compliance obligations, the Green Bank appreciates the desire to address this. The administratively preferable approach to resolving this phenomenon would be to simply increase RPS requirements by an estimated compensatory amount, while also requiring that RECs within competitive procurements be valued and transparently disclosed so as to discern the cost on ratepayers for meeting the RPS policy.	
53	Matt Macunas	Connecticut Green Bank	Written	Objective 2	BTM Solar	It is the Green Bank's position that all behind the meter residential solar projects participating in PURA approved net metering or tariff programs for homeowners should retain tax exempt status. Additionally, residential solar PV systems with estimated annual production that is slightly greater than the estimated annual load for the residence should also retain full tax exempt status in an effort to encourage households to confront climate change by purchasing an electric vehicle and/or installing renewable heating and cooling equipment.	

Comment No.	Commenter Name	Affiliation	Written/ Oral	Section	Subject	Comment Summary	DEEP Response
53	Matt Macunas	Connecticut Green Bank	Written	Objective 2	BTM Solar	Figure 2.10 illustrates the proportional project capacity from both procured and behind the meter resources. It depicts procured resources as both commissioned and expected, while being unclear if the same approach is applied for BTM. With the paragraph on pages 147-148 this same point applies, carrying implications for the tempo of future procurements.	
53	Matt Macunas	Connecticut Green Bank	Written	Objective 3	Affordability	Figure 3.1 depicts the various components of the standard electric bill across time. This is an informative illustration. The Green Bank wonders whether additional learnings on customer impact can be derived from running regressions on each curve over shorter time scales (e.g., 3-, 5- and 10-year) so as to put into starker relief the pricing trends customers encounter and better identify explanations for where increases (or decreases) in their energy bills is coming from.	
53	Matt Macunas	Connecticut Green Bank	Written	Strategies	Biomass Phasedown	Regarding the recommendation to phase down the value of biomass RECs eligible as Class I resources, the Green Bank agrees with this on the principle that Connecticut's clean energy policy should focus on the growth of local industry and capacity when and where possible.	

Comment No.	Commenter Name	Affiliation	Written/ Oral	Section	Subject	Comment Summary	DEEP Response
54	Equinor	Equinor Wind US, LLC	Written	Strategies	Procurements	Although the Draft IRP suggests that the State may not hold another procurement until 2023, Equinor respectfully submits that Connecticut's commitment to being a "national leader on climate action" could be advanced by reconsidering that timeline and moving now to procure some or all of the 1,196 MW of Class I renewable energy currently authorized by Public Act 19-71 in 2021 or 2022. To the extent DEEP is concerned that a large procurement would come online before Millstone's retirement and place a higher cost burden on ratepayers, DEEP could hedge against that risk by selecting a smaller procurement that will be available around the same time Millstone's current contract expires.	DEEP appreciates these comments and will take them into account in future energy planning processes. DEEP also encourages the commenter to see Strategy 5 for more information on DEEP's current approach to future offshore wind procurements.
54	Equinor	Equinor Wind US, LLC	Written	Strategies	Transmission	Equinor fully supports DEEP's commitment to addressing transmission constraints through smart planning and procurement.	
54	Equinor	Equinor Wind US, LLC	Written	Strategies	Market Reform	Equinor also recognizes DEEP's pledge to work towards reforming wholesale energy markets to ensure the long-term competitiveness of zero-carbon products and remove the imbedded preference for legacy fossil fuel generation but the expansion of capital-intensive offshore wind has been driven by the certainty and stability provided by the procurement of	

Comment No.	Commenter Name	Affiliation	Written/ Oral	Section	Subject	Comment Summary	DEEP Response
						grid-scale renewable resources and transitioning away from it prematurely could hinder offshore wind growth.	
55	Vincent Pace	CL&P/YGS dba Eversource Energy	Written	Strategies	Zero Carbon Target	Supports, but this will increase the cost of electricity to ratepayers so DEEP needs to advocate for a balanced approach to decarbonization in all relevant sectors.	DEEP appreciates these comments and will take them into account in future energy planning processes.
55	Vincent Pace	CL&P/YGS dba Eversource Energy	Written	Strategies	Market Reform	Supports, but should be done within the ISO-NE and NEPOOL stakeholder process. As part of this reform, wholesale market rules should be modified to incorporate state-sponsored renewable resources and resources needed to maintain reliability. All renewable generation should count towards the region's ICR. State sponsored resources should not be excluded by MOPR	
55	Vincent Pace	CL&P/YGS dba Eversource Energy	Written	Strategies	Transmission	Supports conclusion of need for robust transmission infrastructure and coordinated processes, but notes that there are ongoing processes within the existing transmission planning framework	
55	Vincent Pace	CL&P/YGS dba Eversource Energy	Written	Strategies	Procurements	Eversource believes Connecticut should actively continue to monitor developments to ensure that the state and its workforce are competitively positioned to benefit from developments in offshore wind.	

Comment No.	Commenter Name	Affiliation	Written/ Oral	Section	Subject	Comment Summary	DEEP Response
55	Vincent Pace	CL&P/YGS dba Eversource Energy	Written	Strategies	REC Retention	Eversource monetizes the RECs received from DEEP's various energy policy programs. These revenues are then used to reduce the costs to customers that support these programs. Eversource supports a review that would lead to using RECs to minimize customer costs.	
55	Vincent Pace	CL&P/YGS dba Eversource Energy	Written	Strategies	BTM Solar	Eversource respectfully submits that the problem is overstated in that the "double count" only impacts RPS classes where the behind the meter generation RECs both count as supply and reduce RPS requirements. The other RPS class reductions are wholly appropriate. However, Eversource does not see this double counting as necessarily undesirable. Just as public policy looks to reduce the value of RECs from biomass generation (as discussed in the Draft IRP's Strategy #14) it may be good public policy to accept the effective enhanced value of RECs from behind the meter generation. For these reasons, Eversource recommends leaving matters as they stand.	

Comment No.	Commenter Name	Affiliation	Written/ Oral	Section	Subject	Comment Summary	DEEP Response
55	Vincent Pace	CL&P/YGS dba Eversource Energy	Written	Strategies	Workforce Development	Draft IRP's Strategy #9 may want to reflect that Connecticut's energy efficiency programs have been, and continue to be, an important source of workforce and economic development in our State. may also wish to briefly mention job growth that is expected in those occupations such as line workers and field technicians that support electric infrastructure needed for safe and reliable service, as well as to support clean energy programs that interconnect facilities into the grid. In recognition of that need, for example, Eversource has partnered with Capital Community College in Hartford to implement the Eversource Electric Lineworker Certificate Program to help develop the next generation of line workers and to continue to develop a more diverse workforce.	
55	Vincent Pace	CL&P/YGS dba Eversource Energy	Written	Strategies	Siting	Eversource believes solar siting that responsibly aligns clean energy goals with other environmental priorities is critical to the long-term development of Connecticut's solar industry.	

Comment No.	Commenter Name	Affiliation	Written/ Oral	Section	Subject	Comment Summary	DEEP Response
55	Vincent Pace	CL&P/YGS dba Eversource Energy	Written	Strategies	Offshore Wind	Regarding Strategy #11, "Leverage Regional Coordination to Develop Best Practices for Offshore Wind Siting", Eversource supports this position and believes this Strategy is necessary. States should coordinate the landfall and transmission planning associated with offshore wind development to support their regional greenhouse gas goals. Eversource suggests that key best practices for these coordination efforts should include (1) setting and adhering to reasonable deadlines for completing permitting reviews, and (2) ensure the siting process considers the deleterious effects of doing nothing (e.g., not reducing climate emissions). The region's transmission owners must have a central role in these coordination activities.	
55	Vincent Pace	CL&P/YGS dba Eversource Energy	Written	Strategies	Energy Efficiency	Eversource supports the continued investment in cost-effective energy efficiency and active demand response	
55	Vincent Pace	CL&P/YGS dba Eversource Energy	Written	Strategies	Energy Storage	Ideally, siting battery storage at the same transmission stations as offshore wind would help maximize the interconnection capacity; however, practical limitations of limited offshore wind sites may prevent this outcome. Careful study of transmission locations that can withstand the load associated with charging these batteries charging is critical to successful	

Comment No.	Commenter Name	Affiliation	Written/ Oral	Section	Subject	Comment Summary	DEEP Response
						deployment of large quantities of batteries throughout the electric grid.	
56	Dan Canavan	United Illuminating	Written	Strategies	Zero Carbon Target	Commends the bold recommendation of advancing a 100% zero-carbon supply target for Connecticut.	DEEP appreciates these comments and will take them into account in future energy planning processes.
56	Dan Canavan	United Illuminating	Written	Strategies	Market Reform	Supports market reforms that incorporate the state's climate and clean energy policies and allows clean energy resources to compete fairly.	
56	Dan Canavan	United Illuminating	Written	Strategies	Governance reform	Supports DEEP's intention to pursue improvements to the transparency and governance of ISO-NE	
56	Dan Canavan	United Illuminating	Written	TRPS	TRPS	Supports conclusion to refrain from adoption TRPS as ratepayers should not be asked to support a reduction in GHG emissions associated with delivered fuel.	
56	Dan Canavan	United Illuminating	Written	Strategies	Transmission	Supports the Department's conclusions that a proactive approach to transmission planning must be prioritized. Specifically supports a competitive model for public policy transmission projects subject to the right of an incumbent transmission owner to build, own and earn a return. Cost allocation for public policy transmission needs must be addressed jointly by the states. reliability planning process should not be halted or interrupted. Holistic planning process should take advantage of owner to make	

Comment No.	Commenter Name	Affiliation	Written/ Oral	Section	Subject	Comment Summary	DEEP Response
						incremental cost-effective upgrades.	
56	Dan Canavan	United Illuminating	Written	Strategies	Energy Efficiency	Supports energy efficiency and active demand response but believes the programs should continue to be administered by the utilities within the CLM framework.	
57-91	Alicia Dolce, Julie Wagner, Leslie Lee, Pam Ferraro, Denise Wells, Becky Bunnell, Carol Osborn, Jennifer Kleindienst, Maggie Redfern, Maren McNamee, Monica Keady, Rose Nolin, Storm Kutcha, Svetlana Wasserman, Rev. David Roones, Andrew Lopez, Barbara Setlow, Hon. Pete Govert, Alex Grande, Ed Farman, Steve Coffey, Alex Rodriguez, Charles Weedon, Chris Schweitzer, Fred Louis, Lindsay Suter, Marc Favreau, Robert Darst, Robert Dickinson, Robert Roman, Royal Graves, William	Citizen	Written	Strategies	Market Reform	Supports efforts to reform the ISO-NE policies	DEEP appreciates these comments and will take them into account in future energy planning processes. DEEP encourages the commenters to see the additions to Objective 3 that discuss energy equity and accessibility of the state's various energy programs; Objective 4 that discuss siting equity; and Objective 5 that discuss grid security, resiliency, and microgrids. Additionally, please see Strategy 16, which provides a recommendation on microgrids in Connecticut.

Comment No.	Commenter Name	Affiliation	Written/ Oral	Section	Subject	Comment Summary	DEEP Response
	Leavy, Adelhaid Koepfer, Elizabeth Coffey, Judy Belaval						
57-91	Alicia Dolce, Julie Wagner, Leslie Lee, Pam Ferraro, Denise Wells, Becky Bunnell, Carol Osborn, Jennifer Kleindienst, Maggie Redfern, Maren McNamee, Monica Keady, Rose Nolin, Storm Kutcha, Svetlana Wasserman, Rev. David Roones, Andrew Lopez, Barbara Setlow, Julie Wagner, Hon Pete Govert, Alex Grande, Ed Farman, Steve Coffey, Alex Rodriguez, Charles Weedon, Chris Schweitzer, Fred Louis, Lindsay Suter, Marc Favreau, Robert Darst, Robert Dickinson, Robert Roman, Royal Graves, William Leavy, Adelhaid Koepfer, Elizabeth	Citizen	Written	Objective 3	Equity	Must ensure benefits of carbon-free grid are realized, especially in communities suffering from pollution.	

Comment No.	Commenter Name	Affiliation	Written/ Oral	Section	Subject	Comment Summary	DEEP Response
	Coffey, Judy Belaval						
57-91	Alicia Dolce, Julie Wagner, Leslie Lee, Pam Ferraro, Denise Wells, Becky Bunnell, Carol Osborn, Jennifer Kleindienst, Maggie Redfern, Maren McNamee, Monica Keady, Rose Nolin, Storm Kutcha, Svetlana Wasserman, Rev. David Roones, Andrew Lopez, Barbara Setlow, Julie Wagner, Hon Pete Govert, Alex Grande, Ed Farman, Steve Coffey, Alex Rodriguez, Charles Weedon, Chris Schweitzer, Fred Louis, Lindsay Suter, Marc Favreau, Robert Darst, Robert Dickinson, Robert Roman, Royal Graves, William Leavy, Adelhaid Koepfer, Elizabeth Coffey, Judy Belaval	Citizen	Written	Objective 1	100% Zero Carbon Target	Connecticut cannot substitute renewable energy credits for the need to eliminate combustion-fired generation within our communities. Any 100% carbon-free goal must recognize the need to eliminate fossil-fuel and other combustion technologies within the state's borders.	

Comment No.	Commenter Name	Affiliation	Written/ Oral	Section	Subject	Comment Summary	DEEP Response
57-91	Alicia Dolce, Julie Wagner, Leslie Lee, Pam Ferraro, Denise Wells, Becky Bunnell, Carol Osborn, Jennifer Kleindienst, Maggie Redfern, Maren McNamee, Monica Keady, Rose Nolin, Storm Kutcha, Svetlana Wasserman, Rev. David Roones, Andrew Lopez, Barbara Setlow, Julie Wagner, Hon Pete Govert, Alex Grande, Ed Farman, Steve Coffey, Alex Rodriguez, Charles Weedon, Chris Schweitzer, Fred Louis, Lindsay Suter, Marc Favreau, Robert Darst, Robert Dickinson, Robert Roman, Royal Graves, William Leavy, Adelhaid Koepfer, Elizabeth Coffey, Judy Belaval	Citizen	Written	Strategies	Biomass Phasedown	Should eliminate biomass from Class I RPS.	

Comment No.	Commenter Name	Affiliation	Written/ Oral	Section	Subject	Comment Summary	DEEP Response
57-91	Alicia Dolce, Julie Wagner, Leslie Lee, Pam Ferraro, Denise Wells, Becky Bunnell, Carol Osborn, Jennifer Kleindienst, Maggie Redfern, Maren McNamee, Monica Keady, Rose Nolin, Storm Kutcha, Svetlana Wasserman, Rev. David Roones, Andrew Lopez, Barbara Setlow, Julie Wagner, Hon Pete Govert, Alex Grande, Ed Farman, Steve Coffey, Alex Rodriguez, Charles Weedon, Chris Schweitzer, Fred Louis, Lindsay Suter, Marc Favreau, Robert Darst, Robert Dickinson, Robert Roman, Royal Graves, William Leavy, Adelhaid Koepfer, Elizabeth Coffey, Judy Belaval	Citizen	Written	Objective 4	Siting	Prioritize retirement of fossil and combustion generation units in CT.	

Comment No.	Commenter Name	Affiliation	Written/ Oral	Section	Subject	Comment Summary	DEEP Response
57-91	Alicia Dolce, Julie Wagner, Leslie Lee, Pam Ferraro, Denise Wells, Becky Bunnell, Carol Osborn, Jennifer Kleindienst, Maggie Redfern, Maren McNamee, Monica Keady, Rose Nolin, Storm Kutcha, Svetlana Wasserman, Rev. David Roones, Andrew Lopez, Barbara Setlow, Julie Wagner, Hon Pete Govert, Alex Grande, Ed Farman, Steve Coffey, Alex Rodriguez, Charles Weedon, Chris Schweitzer, Fred Louis, Lindsay Suter, Marc Favreau, Robert Darst, Robert Dickinson, Robert Roman, Royal Graves, William Leavy, Adelhaid Koepfer, Elizabeth Coffey, Judy Belaval	Citizen	Written	IRP In General	Decarbonization Strategy	Decarbonization strategy must eliminate in-state fossil fuel and combustion technologies, ensure expanding clean procurement starting in 2021	

Comment No.	Commenter Name	Affiliation	Written/ Oral	Section	Subject	Comment Summary	DEEP Response
57-91	Alicia Dolce, Julie Wagner, Leslie Lee, Pam Ferraro, Denise Wells, Becky Bunnell, Carol Osborn, Jennifer Kleindienst, Maggie Redfern, Maren McNamee, Monica Keady, Rose Nolin, Storm Kutcha, Svetlana Wasserman, Rev. David Roones, Andrew Lopez, Barbara Setlow, Julie Wagner, Hon Pete Govert, Alex Grande, Ed Farman, Steve Coffey, Alex Rodriguez, Charles Weedon, Chris Schweitzer, Fred Louis, Lindsay Suter, Marc Favreau, Robert Darst, Robert Dickinson, Robert Roman, Royal Graves, William Leavy, Adelhaid Koepfer, Elizabeth Coffey, Judy Belaval	Citizen	Written	Strategies	Microgrids	DEEP should include a microgrid strategy.	

Comment No.	Commenter Name	Affiliation	Written/ Oral	Section	Subject	Comment Summary	DEEP Response
57-91	Alicia Dolce, Julie Wagner, Leslie Lee, Pam Ferraro, Denise Wells, Becky Bunnell, Carol Osborn, Jennifer Kleindienst, Maggie Redfern, Maren McNamee, Monica Keady, Rose Nolin, Storm Kutcha, Svetlana Wasserman, Rev. David Roones, Andrew Lopez, Barbara Setlow, Julie Wagner, Hon Pete Govert, Alex Grande, Ed Farman, Steve Coffey, Alex Rodriguez, Charles Weedon, Chris Schweitzer, Fred Louis, Lindsay Suter, Marc Favreau, Robert Darst, Robert Dickinson, Robert Roman, Royal Graves, William Leavy, Adelhaid Koepfer, Elizabeth Coffey, Judy Belaval	Citizen	Written	Objective 3	Affordability	Ensure low-income access to energy efficiency and weatherization programs as well as clean energy investments.	
92	Dr. Patricia Reardon	Citizen	Written	IRP In General	Evs	Electrify public transit vehicles and improve/expand public transit services statewide. Greatly	DEEP appreciates these comments and will take them into account in future energy planning

Comment No.	Commenter Name	Affiliation	Written/ Oral	Section	Subject	Comment Summary	DEEP Response
						expand the number of rapid charging stations statewide for electric vehicles.	processes. DEEP also encourages the commenter to see additions made to Objective 3 that summarize DEEP and its partners' efforts to increase energy equity and accessibility to the state's energy programs, Objective 5 and Strategy 16 that discuss grid security, resiliency, and microgrids. Additionally the commenter should see Strategy 5 for DEEP's near term approach to procuring additional renewable resources.
92	Dr. Patricia Reardon	Citizen	Written	IRP In General	Decarbonization	Expand efforts to make electricity generation cleaner in CT. Increase regulation and fines for entities that polite air, water and soil.	
92	Dr. Patricia Reardon	Citizen	Written	IRP In General	Misc.	Increase low-income, energy-efficient housing that is located in areas accessible to sources of public transit. Promote expansion of greenspace in large tracts to aid wildlife migration/ breeding and regeneration . Regulate fishing to promote stock regeneration. Reward businesses that use biodegradable containers.	
92	Dr. Patricia Reardon	Citizen	Written	Objective 4	Siting	Prioritize retirement of fossil and combustion generation units in CT.	
92	Dr. Patricia Reardon	Citizen	Written	IRP In General	Decarbonization Strategy	Decarbonization strategy must eliminate in-state fossil fuel and combustion technologies, ensure expanding clean procurement starting in 2021	
92	Dr. Patricia Reardon	Citizen	Written	Strategies	Microgrids	DEEP should include a microgrid strategy.	
92	Dr. Patricia Reardon	Citizen	Written	Objective 3	Affordability	Ensure low-income access to energy efficiency and weatherization programs as well as clean energy investments.	
93	David Newton	Citizen	Written	IRP In General	Decarbonization	Urges additional emphasis on the long term benefits of the cleanest available resources of solar, wind, and water power as carbon based fuels are diminished in use.	DEEP appreciates these comments and will take them into account in future energy planning processes. DEEP encourages the commenter to see Objective 5 and

Comment No.	Commenter Name	Affiliation	Written/ Oral	Section	Subject	Comment Summary	DEEP Response
93	David Newton	Citizen	Written	Objective 1	Millstone	No objections to nuclear power if and when proper disposal of residue is finally determined. Supports the systematic addition of solar and wind resources in anticipation of the reduction of nuclear power use.	Strategy 16 for additional discussion on grid security, resiliency, and microgrids.
93	David Newton	Citizen	Written	Strategies	Microgrids	Hopeful that support of micro projects can be supported as they will produce more citizen support for the zero emission future we seek.	