

DATE

Commissioner Rob Klee
Deputy Commissioner Mary Sotos
CT Department of Energy and Environmental Protection
79 Elm St.
Hartford, CT 0610

Dear Commissioner Klee and Deputy Commissioner Sotos:

The undersigned organizations respectfully submit this letter in response to the draft Comprehensive Energy Strategy (CES) issued on July 26, 2017. We appreciate the draft CES's recognition of the importance in continued investment in clean energy resources, grid-modernization, increasing energy efficiency in buildings and transportation, and accelerating progress to decarbonize the energy sector. We recognize that the CES is a supporting policy for the state's long-term comprehensive climate strategy, now under development by the Governor's Council on Climate Change (GC3). However, we are seriously concerned that neither the specific proposals nor the underlying assumptions contained in the CES will get us to the carbon reduction goals that Connecticut has embraced, and some of the draft recommendations will actually slow the deployment of in-state renewables rather than foster growth that would benefit both our environment and economy.

To ensure Connecticut meets its science-based targets for reducing greenhouse gas (GHG) emissions and transitions to a clean, healthy renewable energy economy, the final CES must adopt the following fundamental policies and strategies:

- 1) **Speed clean energy deployment and emissions reductions through a more ambitious Renewable Portfolio Standard (RPS).** Even with the beneficial goal of phasing down biomass and landfill gas, the proposal to increase the Class I RPS to 30% by 2030 will not ramp up true renewables like solar and wind fast enough to meet our short and long-term emissions-reduction goals without continued reliance on aging and expensive energy sources like nuclear.
- 2) **Support rather than hinder local solar growth.** More rooftop solar is vital to help reduce our in-state GHG emissions, create a resilient and affordable electric grid, and strengthen our local economy. We strongly oppose any cap to the behind-the-meter solar market, which would stifle rather than support Connecticut's green economy.
- 3) **Ensure the true value of renewable resources is considered when assessing costs and benefits of power generation alternatives.** The CES must ensure that all ratepayer benefits from distributed energy resources are properly accounted for – including distribution services and cost avoidance, market price suppression, and health, reliability, security and resiliency benefits. A transparent, public process, with engagement from all stakeholders, including experts in this area, is critical to ensure the benefits of solar, as

well as other distributed energy resources like microgrids and battery storage, are fairly calculated and incorporated into a cost-benefit analysis regarding renewable programs.

- 4) **Expand access to solar through the timely promulgation of a statewide, shared solar program.** The draft CES fails to acknowledge the benefits of a full statewide community solar program, and suggests policies that may hinder participation in shared solar. The final CES must promote shared solar as a mechanism to equitably distribute the benefits from solar across Connecticut. Accordingly, the final CES should specify that a full-scale shared renewables program will be in place within the three-year period covered by this CES.
- 5) **Increase energy efficiency savings targets.** While the draft CES recognizes the many benefits of energy efficiency (the cheapest, cleanest electricity resource), it only suggests incremental policy recommendations for continuing Connecticut's current programs at current savings levels. The final CES should include specific proposals for DEEP to work with the Energy Efficiency Board to achieve all cost-effective energy efficiency, including proposed legislative changes that would require energy efficiency funding to follow higher established savings levels.
- 6) **Speed up the timeline for adopting specific policies (the EV Roadmap) to accelerate the adoption of Electric Vehicles (EVs).** Connecticut needs bold and swift action to meet its commitment under the State Zero Emission Vehicle Programs Memorandum of Understanding to putting approximately 155,000 EVs on the road by 2025. To cut GHG emissions from the transportation sector and build a clean energy future, the final CES should include concrete policy proposals so we can take immediate steps to meet these urgent goals. For example, we must establish policies now that will make EVs affordable (through stronger incentives) and appealing for all Connecticut consumers (by building out our state's EV charging infrastructure and educating consumers about EVs). The final CES should require the Public Utilities Regulatory Authority to work with our utilities to ensure that new EV electric load is incorporated in a safe, reliable, and efficient manner, supported by scaled-up solar photovoltaics, and other critical steps are taken to modernize the electric system and enable smart EV integration.
- 7) **Firmly reject new natural gas infrastructure.** Expanded natural gas infrastructure is incompatible with the state's short and long-term GHG reduction goals. Despite flattening electricity sales, the draft CES still attributes grid reliability concerns in the winter months to pipeline capacity constraints, implying that new natural gas infrastructure may be needed, and asserts that natural gas is an important component and step towards achieving our energy and emissions goals. New interstate gas pipelines would cost consumers billions of dollars to build, operate and maintain, with no proven net benefits and high risk of substantial stranded costs. The final CES should explicitly endorse alternative strategies – including aggressive energy-efficiency measures, removal of barriers to scaling up renewables and deployment of targeted distributed energy resources – as superior options to investing in pipelines.

- 8) Create a Specific Plan to Convert Fossil-Fuel Based Heating to Efficient Electricity.** As recognized by the GC3, electrifying heating through deployment of renewable thermal technologies like heat pumps is a critical component to meeting our GHG-reduction targets. Yet the draft CES recommends focusing only on switching customers currently using traditional electric resistance heat to heat pumps due to current market conditions (low fuel prices). The final CES should go further and recommend specific policies to promote renewable thermal technology development and deployment in all buildings, and encourage utilities to prioritize heat pump conversions over converting customers to gas heating.

The next three years are a critical time for strategic, innovative energy policy and climate action in Connecticut. The state has committed itself to the goals of the Paris Accord through the United States Climate Alliance. In this period of federal rollbacks on climate and energy leadership, Connecticut needs to step up with decisive actions to promote our full transition to a clean energy economy. The final CES needs to chart a critical path forward, year by year, of scaled-up renewable energy and reduced dependence on fossil fuel sources. We hope you will take the necessary steps outlined above to create a more ambitious, transparent energy strategy.

Sincerely,

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Connecticut Fund for the Environment

Sean Garren
Vote Solar

Melissa Everett
Clean Water Action

John Humphries
CT Roundtable on Climate & Jobs

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