



October 29, 2019

Commissioner Katie Dykes
Department of Energy and Environmental Protection
79 Elm St
Hartford, CT 06106

Dear Commissioner Dykes,

Thank you for the opportunity to provide public comment on Governor Lamont's Executive Order No. 3 to strengthen Connecticut's commitment to a decarbonized electric grid and support our state's efforts to combat climate change. We at the Connecticut League of Conservation Voters (CTLCV) are excited to see the administration setting bold goals in the face of the looming threat of our climate crisis.

Governor's Council on Climate Change

As part of Executive Order No. 3, Gov. Lamont indicated he would expand and strengthen the Governor's Council on Climate Change (GC3). The original GC3 was instrumental in setting Connecticut's carbon reduction goals, but that is not to say it is beyond improvement. Advocates including CTLCV were quick to indicate that many important voices were not included on the GC3. We hope to see that rectified here.

CTLCV strongly recommends that the GC3 be composed of a diverse group of stakeholders, including, but not limited to local and statewide lawmakers, community leaders, climate scientists, economists, labor representatives, and business leaders. In particular, the GC3 should include representatives from marginalized and disenfranchised communities. These groups often face the brunt of pollution and climate change, but they are often left out of decision-making processes aimed at addressing these issues. If the GC3 is to truly offer guidance on addressing the impact of climate change, it must first have a full accounting of those impacts from communities that would feel them most potently.

Decarbonizing Our Electric Grid

CTLCV also applauds the Executive Order's directive to decarbonize our state's electric grid. That is a laudable goal, and one we hope to see reflect Governor Lamont's pledge to transition our state to 100% clean energy.

There are many pathways to a zero-carbon future, but the clearest is a commitment to clean energy. Connecticut's recent procurement of 2,000 MW of offshore wind energy is a fine start, representing roughly a third of our state's energy needs. However, we must be prepared to meet our Renewable Portfolio Standards goals of 40% clean energy by 2030. We should also plan for the potential decommissioning of the Millstone Nuclear Power Plant in the next ten years. Millstone represents a third of our energy needs, and is currently the largest provider of zero-carbon electricity in the state. If Connecticut does not put a plan in place now, we could be forced to turn to fossil fuels like fracked gas to meet our energy needs. That is not in keeping with Executive Order No. 3 or our previous commitments.

CTLCV strongly opposes investments in fossil fuels—such as the new fracked gas power plant planned in Killingly. This power plant would not be in keeping with the Governor's zero-carbon proposal, nor would it help us lower carbon emissions. While we recognize the need for reliable energy even when the

wind is not blowing or the sun is not shining, CTLCV urges Connecticut to invest instead in energy efficiency and battery storage. By both decreasing the amount of energy we use and investing in new ways to store electricity, we can ensure reliability even during peak times without turning to fossil fuels.

These investments in energy efficiency should include equal access to programs, regardless of heating fuel type. Connecticut should also seek to expand access to energy efficiency programs by considering ways to implement automatic enrollment. For instance, households eligible for SNAP, WIC, or HUSKY benefits could be automatically enrolled in our energy efficiency programs. Not only would this reduce the draw on our electric grid, it could reduce the cost of electricity for the roughly 400,000 households struggling to pay their energy bills.

CTLCV also encourages Connecticut to increase its clean, renewable energy procurements. Massachusetts, Rhode Island, and other New England states have begun construction on their own offshore wind facilities. We could look for ways to partner with the other states of ISO New England to issue a joint procurement of offshore wind, thus driving costs down while ensuring we can all meet our energy needs.

Additionally, Connecticut should increase its investments in solar energy, particularly shared solar programs for those who live in apartments, condos, or other facilities where traditional rooftop solar panels would not be feasible. Currently, our community solar program is burdened by overly restrictive rules such as preventing unused energy from rolling over to subsequent years. There are also restrictive caps on the amount of solar energy participants can procure. Connecticut should loosen the reins on community solar to allow this program to expand, giving more households the chance to tap into clean energy and potentially lower their costs.

Investments in clean energy are certainly important, but further funding for resiliency and carbon sequestration are equally critical, but funds for land conservation are often the first to be raided in times of budget shortfalls. Forests and open space act as critical carbon sinks. Connecticut should stop diverting funds from programs like the Community Investment Act to ensure we can protect our forests from development.

Furthermore, we must ensure our towns and communities—particularly on our vulnerable coastlines—have the resources they need to make necessary upgrades and improve natural buffers. Hurricanes and superstorms have ravaged Connecticut in the past. Climate change ensures these storms will hit again, and the damage could be catastrophic. It is much more cost-effective to invest in resiliency now rather than major repairs in the wake of a superstorm.

Connecticut must also think of the broader picture. To fight climate change and build a zero-carbon future, we must be prepared to take bold action. There are a myriad of goals we could set and programs we could expand, including:

- Setting strict energy efficiency standards for buildings to reduce emissions, lower their draw on the electric grid, and reduce energy costs for us all;
- Informing households about energy efficiency upgrades and best practices;
- Creating a Residential Property Assessed Clean Energy (R-PACE) program to assist low-income households with financing energy efficient improvements;
- Increasing our Renewable Portfolio Standard to 100% clean energy by 2050 or sooner;
- Electrifying a greater percentage of our mass transit—including school buses;
- Banning new fracked gas, coal, oil, or other fossil fuel infrastructure development;

- Repealing the Pipeline Tax to prevent utility companies from turning to ratepayers to finance fossil fuel expansions;
- Expanding “mini-grids” and “smart grids” to decentralize our power distribution structure;
- Educating the public on sustainable farming practices like crop rotation and soil management to better preserve lands that act as natural carbon sinks;
- Mandating community and stakeholder involvement in the planning and implementing of resiliency measures;
- Monitoring state agencies for compliance with Lead by Example programs and holding them accountable should they fall short.

There is no shortage of steps to take to build the zero-carbon future Gov. Lamont outlined in Executive Order No. 3. If the will is there, Connecticut could cement our standing as a national leader in the clean energy future. We could make investments that will not only help us turn back the clock on climate change, but also create green collar jobs and lower our massively high electric rates.

Thank you again for the opportunity to submit these comments. We at CTLCV look forward to working with you and the entire Lamont Administration in the days to come.

Sincerely,



Amanda Schoen

Deputy Director
CTLCV