



**Connecticut Fund for the Environment**  
**Comments on the Draft Comprehensive Energy Strategy**  
**Executive Summary**

*As a part of legislation reforming Connecticut's energy policy in 2011, the Department of Energy and Environmental Policy ("DEEP") prepared a draft Comprehensive Energy Strategy ("CES") to assess and plan for all energy needs in the State of Connecticut. The final CES will serve as a guide for the legislature, DEEP, and the Public Utility Regulatory Authority ("PURA"). In October, the draft CES was released to the public. Several public hearings and technical meetings were held on the strategy to provide further information and obtain public comment. Below are the highlights from our comments on the draft CES.*

The draft CES contains numerous policies that will allow Connecticut to reduce greenhouse gas ("GHG") emissions, clean our air, and revitalize our economy. This state has been a leader on many energy issues and the final CES is an important opportunity to continue this tradition.

First and foremost, we strongly support the focus of the draft CES on achieving all cost-effective energy efficiency for all fuels and generally striving for broader and deeper energy efficiency investment. It is abundantly clear from the draft CES that energy efficiency investment is the most economically and environmentally effective energy policy to pursue in the short- and medium-term. To fully capture the opportunities that are available, the final CES should include additional proposals to:

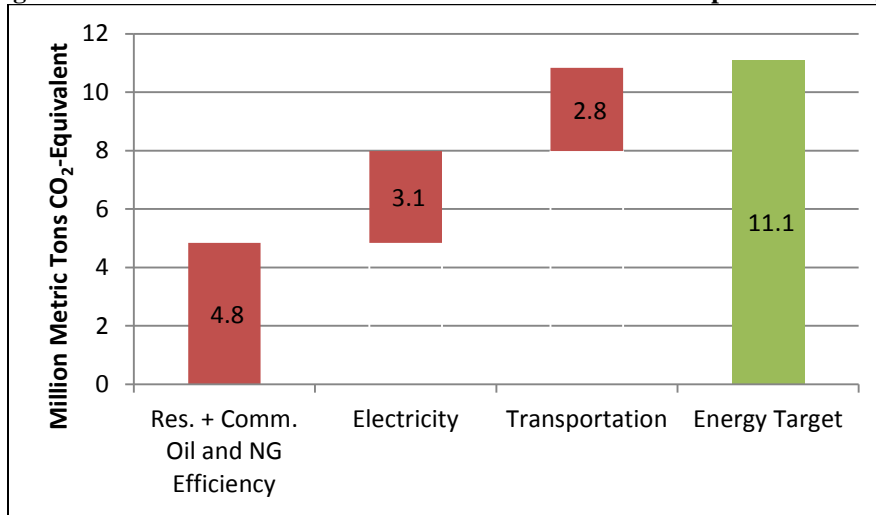
- Create partnerships to motivate building owners to take action; and
- Require disclosure of energy use at the time of sale or rental and benchmarking of energy efficiency in key categories of buildings.

Secondly, Connecticut has begun to feel the effects of climate change directly with three unusually strong and damaging storms in under 15 months. Our changing climate has been definitively linked with GHG emissions and the State of Connecticut recognized this in 2008 with the passage of the Global Warming Solutions Act. The major policy proposals in the draft CES provide a solid framework for achieving our medium-term GHG emissions reduction goals. Based upon the mandated levels for 2020 and 2050, it is possible to estimate the proper levels of GHG emissions for 2030 and 2040. In particular, the following three policies in combination may be nearly sufficient to reach our 2030 GHG goals:

- All cost-effective energy efficiency for natural gas and heating oil in residential and commercial buildings;
- Replacing the 2010 levels of coal and oil generation with energy efficiency and renewable energy; and
- The transportation policies proposed in the draft CES.

Figure ES-1 provides estimates of the GHG emissions reductions possible from these three policies.

**Figure ES-1. Potential GHG Reductions from Policies and Comparison to Target**



Further analysis should be performed to determine if these GHG reductions for 2030 are feasible with the policies proposed in the draft CES. Based upon such an analysis, we hope that DEEP will assemble a group of policies to achieve our GHG emissions goal for 2030.

Thirdly, it is important to continue implementing strategies in the electric sector to make generation cleaner and more reliable. We support the many programs on this front in the draft CES, including the Zero Emissions and Low Emissions Renewable Energy Credit program and the several programs initiated by the Clean Energy Finance and Investment Authority. We do not believe that amending the state’s Renewable Portfolio Standard to include large Canadian hydropower projects would be a productive step.

The proposed expansion of natural gas must be designed consistently with our short-term and long-term environmental and economic goals. We agree that conversion from heating oil to natural gas can reduce GHG emissions and local pollutants. Conversion of buildings already on natural gas mains is a sensible step to take. However, any planning process to invest in new infrastructure must include a full evaluation of the relevant economic and environmental risks, particularly when compared to other strategies such as energy efficiency.

Lastly, the final CES should include a more robust set of transportation recommendations. Specifically, we believe there should be policies to:

- Fully fund and expand transit routes and service frequency;
- Promote transit-oriented development and smart growth; and
- Reduce congestion and raise transportation funds through strategies like congestion pricing.

We applaud the hard work and leadership of DEEP in constructing the draft CES. Reaching the future envisioned by this strategy will require the sustained focus and determination of all of Connecticut’s citizens.