

State Utilities

Ref	Checklist Item	Measurement Criteria	Comments	Points
H.1	Pricing Externalities			
H.1.1	What is the state’s statutory approach for incorporating environmental externalities into their utilities’ decision-making procedures?	<p>Mitigation Score:</p> <p>4 – The state has implemented all four statutory approaches listed to the right for reflecting the environmental and social costs of generating dirty power.</p> <p>3 – The state has implemented three of the four statutory approaches listed to the right for reflecting the environmental and social costs of generating dirty power.</p> <p>2 – The state has implemented two of the four statutory approaches listed to the right for reflecting the environmental and social costs of generating dirty power.</p> <p>1 – The state has implemented one of the four statutory approaches listed to the right for reflecting the environmental and social costs of generating dirty power.</p> <p>0 – The state has implemented none of the four statutory approaches listed to the right.</p> <p>Equity Score:</p> <p>2 – The state has enacted both of criteria ‘c’ and ‘d’ listed to the right.</p>	<p>Burning fossil fuels inflicts social and environmental costs—including property damage, health impacts, and crop losses—that are not reflected in conventional economic assessments of the electricity sector.¹ States have several statutory approaches at their disposal for internalizing these “hidden” costs into electricity planning processes. These range from merely granting PUCs the regulatory discretion to set reasonable rates to explicitly setting a quantified, monetary value of environmental and social externalities (often tethered to the federal Social Cost of Carbon metric). While regulators can read broad authority to consider environmental externalities into even the most generic regulatory statute, explicit directives to consider environmental costs provide stable authority to implement stronger mitigation policies. The four levels of statutory authority enabling regulators to consider the “hidden” costs of dirty power are (from weakest to strongest):</p> <ol style="list-style-type: none"> The state grants its PUC typical regulatory authority to ensure utility rates are fair and reasonable.² The state statutorily directs its PUC to consider public welfare in its electricity planning processes.³ [PH 1.1] The state statutorily directs its PUC to assess the environmental externalities of dirty power in its 	<p>Mitigation Score: 2/4 Equity Score: 0/2 Public Health Score: 1/3</p> <ol style="list-style-type: none"> Conn. Gen. Stat. §16-19(a) authorizes PURA to adjust rates that are “unreasonably discriminatory or more or less than just, reasonable and adequate”. Conn. Gen. Stat §16-19(a) authorizes PURA to adjust rates “to enable such company [utilities] to provide properly for the public convenience, necessity, and welfare”. Connecticut has not enacted an environmental costs statute. Connecticut has not adopted a quantified value for appraising the externalized costs of dirty power generation. <p>State Highlight: New York</p> <p>New York law provides all four types of authority listed to the left for internalizing the hidden costs of dirty power into electricity planning procedures.⁶ New York’s Public Service Commission (PSC) uses the Social Cost of Carbon metric developed by the federal Interagency Working Group on the Social Cost of Greenhouse Gases (IWG) to analyze the costs and benefits of renewable energy procurements and of its resource</p>

		<p>1 – The state has enacted either criterion ‘c’ or criterion ‘d’ listed to the right.</p> <p>0 – The state has enacted neither criterion ‘c’ nor criterion ‘d’ listed to the right.</p> <p><u>Public Health Score:</u></p> <p>3 – The state has enacted all three of criteria ‘b’, ‘c’, and ‘d’ listed to the right.</p> <p>2—The state has enacted two of criteria ‘b’, ‘c’, and ‘d’ listed to the right.</p> <p>1— The state has enacted one of criteria ‘b’, ‘c’, or ‘d’ listed to the right.</p> <p>0 —The state has enacted none of criteria ‘b’, ‘c’, or ‘d’ listed to the right.</p>	<p>electricity planning processes.⁴ [PH 1.1, 1.3] [EQ 4.1]</p> <p>d. The state has adopted a quantified monetary value for appraising the externalized costs of dirty power.⁵ [PH 1.1, 1.3] [EQ 4.1]</p>	<p>compensation schemes for RECs and DERs⁷. Because it participates in RGGI, NY PSC values the marginal social costs of CO₂ emissions as the difference between the IWG’s SCC value and the projected CO₂ trading price under RGGI⁸. The example of New York illustrates how a comprehensive effort to internalize the hidden costs of dirty power can bolster the momentum of green energy programs by accurately reflecting the benefits of transitioning to clean energy resources.</p>
<p>H.1.2</p>	<p>Does the state permit or direct its regulatory authority to internalize the externalized costs of carbon-intensive energy in long-term resource planning?</p>	<p><u>Mitigation Score:</u></p> <p>Total Mitigation Score = List A Score + List B Score</p> <p><u>List A:</u></p> <p>2 – The state <i>directs</i> its PUC to incorporate the externalities of dirty power generation into long-term resource planning.</p> <p>1 – The state <i>permits</i> its PUC to incorporate the externalities of dirty</p>	<p>Most states require that their electric utilities undertake transparent public procedures to secure sufficient power resources to meet residents’ long-term demand. The final product of these procedures, often called an Integrated Resource Plan (IRP), reflects an electric utility’s efforts to balance its duty to supply affordable energy with state procurement prerogatives and stakeholder input. Incorporating the climate, environmental, and societal damages of carbon-intensive energy into IRP procedures helps uncover the often-observed costs of dirty power borne by people and the environment.</p>	<p><u>Mitigation Score: 4/5</u> <u>Equity Score: 0/1</u> <u>Public Health Score: 0/1</u></p> <p><u>Mitigation Score: 4/5</u></p> <p>Conn. Gen. Stat. §16a-3a governs DEEP’s preparation, in consultation with the electric utilities, of a biennial IRP for procurement of power resources.</p> <p><u>List A: 2/2</u></p>

	<p>power generation into long-term resource planning.</p> <p>0 – The state <i>prohibits</i> its PUC from incorporating the externalities of dirty power generation into long-term resource planning.</p> <p><u>List B:</u></p> <p>3 – The state includes all three categories of externalities listed to the right as considerations to be incorporated into its PUCs’ long-term resource planning.</p> <p>2 – The state includes two of the three categories of externalities listed to the right as considerations to be incorporated into its PUCs’ long-term resource planning.</p> <p>1 – The state includes one of the three categories of externalities listed to the right as considerations to be incorporated into its PUCs’ long-term resource planning.</p> <p>0 – The state includes none of the three categories of externalities listed to the right as considerations to be incorporated into its PUCs’ long-term resource planning.</p> <p><u>Equity Score:</u></p>	<p>Further, properly accounting for such externalities incentivizes utilities to make clean energy sources central features of their long-term resource plans.</p> <p>The most comprehensive state attempts to internalize dirty power’s externalities authorize their PUCs to incorporate the following categories of costs into their resource-planning processes (List B):</p> <ol style="list-style-type: none"> a. Incipient/future damages attributable to climate change b. Non-climate related damages inflicted on the environment & natural resources c. Societal costs (including damage to public health, property, and economic productivity) inflicted by local pollution [PH 1.1, 1.3] <p>Moreover, promoting meaningful stakeholder engagement is crucial for ensuring that IRPs adequately reflect the public interest.⁹ Oregon and Wisconsin have implemented funding mechanisms (“intervenor funds”) to allow under-resourced individuals and organizations to represent their own interests in electric resource planning¹⁰. These mechanisms facilitate the introduction of perspectives not adequately represented by industrial consumers or by the utilities themselves. [EQ 5.1, 5.3]</p>	<p>§16a-3a(d) lists numerous factors that DEEP “shall consider” during its preparation of the biennial IRP, including the environmental impacts (both GHGs and local pollutants) of using various types of fuel.¹¹ Although this directive is rather vague, it does provide statutory authority for DEEP to weigh the climate and environmental benefits of moving away from dirty power.</p> <p><u>List B: 2/3</u></p> <p>§16a-3a(b)(4) instructs DEEP to assess “the impact of current and projected environmental standards, including, but not limited to, those related to greenhouse gas emissions and the federal Clean Air Act goals and how different resources could help achieve those standards and goals”. <i>The statute does not mention the societal costs of dirty power generation as a factor for DEEP to consider in preparing the IRP.</i></p> <p><u>Equity Score: 0/1</u></p> <p>Connecticut has not enacted a funding mechanism to promote the involvement of under-resourced individuals and organizations in its electric resource planning procedures.</p> <p><u>Public Health Score: 0/1</u></p> <p>CT Gen.Stat. §16a-3a does not mention the societal costs of dirty power generation as a factor for DEEP to consider in preparing its biennial IRP.</p>
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<p>H.1.3</p>	<p>Does the state permit or direct its regulatory authority to internalize the externalized costs of dirty power in its resource compensation schemes?</p>	<p><u>Mitigation Score:</u></p> <p>Total Mitigation Score = List A Score + List B Score + List C Score</p> <p><u>List A:</u></p> <p>2 – The state <i>directs</i> its PUC to incorporate the externalities of dirty power generation into its resource compensation schemes.</p> <p>1 – The state <i>permits</i> its PUC to incorporate the externalities of dirty power generation into its resource compensation schemes.</p>	<p>Several states have begun to account for the social and environmental costs of dirty power in setting compensation rates for distributed energy resources (DERs) and for low/zero-emission credit programs (ZECs). By grounding compensation for DERs and ZECs in the wide-ranging benefits of avoided emissions, this method reflects an accurate value of replacing dirty power with zero or low-emission power sources. The most comprehensive state attempts to internalize dirty power’s externalities incorporate the following categories of costs into rate-setting processes (List B):</p> <ul style="list-style-type: none"> a. Incipient/future damages attributable to climate change 	<p style="text-align: right;"><u>Mitigation Score: 4/7</u> <u>Equity Score: 1/2</u> <u>Public Health Score: 1/1</u></p> <p><u>Mitigation Score: 4/7</u></p> <p>Pursuant to Section 6 of Public Act 19-35, DEEP and PURA initiated a joint proceeding to study the value of DERs, with a report due on or before July 1, 2020.^[iii] Although the agencies have partially incorporated the externalities of fossil fuels into the VDER analysis, the Act does not require them to do so.</p>

	<p>0 – The state <i>prohibits</i> its PUC from incorporating the externalities of dirty power generation into its resource compensation schemes.</p> <p><u>List B:</u></p> <p>3 – The state includes all three categories of externalities listed to the right as considerations to be incorporated into resource compensation schemes.</p> <p>2 – The state includes two of the three categories of externalities listed to the right as considerations to be incorporated into resource compensation schemes.</p> <p>1 – The state includes one of the three categories of externalities listed to the right as considerations to be incorporated into resource compensation schemes.</p> <p>0 – The state includes none of the three categories of externalities listed to the right as considerations to be incorporated into resource compensation schemes.</p> <p><u>List C:</u></p> <p>2 – The state accounts for the externalized costs of dirty power generation in setting compensation rates for <i>both</i> distributed energy resource programs and low/zero-emission credit programs.</p>	<p>b. Non-climate related damages inflicted on the environment & natural resources</p> <p>c. Societal costs (including damage to public health, property, and economic productivity) inflicted by local pollution [PH 1.1, 1.3]</p> <p>Although marginalized communities disproportionately suffer the costs of dirty power, they remain excluded from the full benefits of clean energy.¹² EJ advocates are innovating ways to expand development of DERs in marginalized communities and low-to-moderate income (LMI) households. New York EJ organizations have proposed an additional financial incentive (“EJ adder”) of 6 cents/kWh to compensation rates for DER projects that meet New York’s environmental justice goals.¹³ [EQ 1.1, 2.1, 3.1, 4.2] Genuine efforts made by the state to meaningfully include EJ advocates in its decision-making processes must be the central component of a good-faith attempt to integrate equity concerns into resource compensation plans.¹⁴ [EQ 5.1, 5.3]</p> <p>Public Health Spotlight:</p> <p>State regulatory authorities consider numerous factors in analyzing the benefits of low/zero-emission energy sources. For society at large, relevant factors include the public health and environmental benefits of avoided local pollution as well as the climate-related benefit of avoided GHG emissions.¹⁵ The states furthest ahead on this trend consider societal and</p>	<p><u>List A Score: 1/2</u></p> <p>While the Act is silent about incorporating the externalities of fossil fuels into the VDER process, this issue appears to have been at least partially reflected in the docket proceeding. A letter from fourteen General Assembly members calls on DEEP/PURA to include “greenhouse gas emissions, air pollution, and overall health care costs”^[iii] in its VDER methodology; and PURA’s PowerPoint slides from a 9/20/19 technical meeting explicitly name “avoided VOCs [volatile organic compounds] and particulates”^[iv] as health benefits to be quantified in its rate-setting process.</p> <p><u>List B Score: 2/3</u></p> <p>Act 19-35 is silent about the categories of costs that DEEP and PURA may consider in setting a value of DERs. The docket shows that DEEP/PURA the agencies are incorporating both the value of avoided greenhouse gas emissions and avoided public health costs into the VDER process. There is no evidence that non-climate related damages to natural resources are being considered.</p> <p><u>List C Score: 1/2</u></p> <p>The VDER docket, as noted above, shows that PURA is considering accounting for the externalities of fossil fuels in establishing incentive levels for clean distributed energy resources.</p>
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H.2 Renewable Portfolios				
H.2.1	Does the state have well-designed Renewable Portfolio Standards (RPS)?	<p><u>Mitigation Score:</u></p> <p>6 – The state has an RPS program with all six of the elements listed to the right.</p> <p>5 – The state has an RPS program with five of the six elements listed to the right.</p> <p>4 – The state has an RPS program with four of the six elements listed to the right.</p> <p>3 – The state has an RPS program with three of the six elements listed to the right.</p> <p>2 – The state has an RPS program with two of the six elements listed to the right.</p> <p>1 – The state has an RPS program with one of the six elements listed to the right.</p> <p>0 – The state does not have any RPS.</p>	<p>RPS are a crucial part of pushing for grid scale adoption of renewable energy. They mandate that a certain percent of power bought/generated by utilities (depending on utility structure) be from state designated renewable sources.</p> <p>Listed below are the elements of a well-designed RPS program.</p> <ol style="list-style-type: none"> a. Eligible resources clearly outlined and categorized¹⁹ b. A compliance entity or entities²⁰ c. A regulatory entity or entities²¹ d. Penalties for noncompliance²² e. Cost caps for consumer protection²³ f. A system to avoid double counting renewable energy²⁴ 	<p style="text-align: right;"><u>Mitigation Score: 5/6</u> <u>Equity Score: N/A</u> <u>Public Health Score: N/A</u></p> <ol style="list-style-type: none"> a. Connecticut has three classes of renewable energy sources as defined in Conn Gen Stat §16-1²⁵ b. The Public Utilities Regulatory Authority acts as the compliance entity c. The Public Utilities Regulatory Authority over sees the Connecticut RPS program²⁶ d. Conn Gen Stat §16-244(c) mandates an Alternative Compliance Payment of 5.5 cent per kilo watt hour charge on renewable portfolio standards not met²⁷ e. Compliance payments must be used to offset ratepayer costs, but there are no cost caps associated with the RPS. f. Conn Gen Stat §16-1 section 20 bars renewable energy sources counted in other states’ RPS

		Equity Score: N/A		from being counted towards Connecticut’s RPS ²⁸
		Public Health Score: N/A		
H.3	Grid Resilience			
H.3.1	Has the state implemented grid resilience or climate adaptation measures that carry mitigation co-benefits?	<p>Mitigation Score:</p> <p>5 – The state has implemented substantial policies in all five grid resilience areas listed to the right.</p> <p>4 – The state has implemented substantial policies in four of the five grid resilience areas listed to the right.</p> <p>3 – The state has implemented substantial policies in three of the five grid resilience areas listed to the right.</p> <p>2 – The state has implemented substantial policies in two of the five grid resilience areas listed to the right.</p> <p>1 – The state has implemented substantial policies in one of the five grid resilience areas listed to the right.</p> <p>0 – The state has not implemented substantial policies in any of the five grid resilience areas listed to the right.</p> <p>Equity Score: N/A</p> <p>Public Health Score: N/A</p>	<p>Extreme weather poses a recurring hazard to the electric grid. Many states have begun reinforcing their electrical infrastructure to withstand the increasingly frequent and intense weather events sparked by climate change. Some of these measures carry mitigation co-benefits. In particular, grid resilience measures which decrease overall energy demand—either through increased efficiency or decentralized generation—can help reduce greenhouse gas emissions. Examples of resilience projects that carry mitigation co-benefits include²⁹:</p> <ul style="list-style-type: none"> a. Microgrids³⁰ b. Smart meters/alternative metering infrastructure (AMI)³¹ c. Distributed energy resources³² d. Energy storage/batteries³³ e. Energy efficiency measures³⁴ 	<p>Mitigation Score: 5/5</p> <p>Equity Score: N/A</p> <p>Public Health Score: N/A</p> <ul style="list-style-type: none"> a. Pursuant to Public Act 12-148, §7, DEEP created a Microgrid Program in 2013 to supply grant money for microgrid installation at critical facilities³⁵. The program has gone through four rounds of applications and awards, with more than \$30 million disbursed to applicant facilities.³⁶ Public Act 16-196 (2016) extended the grant program and expanded its scope³⁷. b. Through the Connecticut Municipal Electric Energy Cooperative (CMEEC), municipal utilities deployed 38,598 smart meters in Groton, Jewett City, Norwich, and South Norwalk in the early 2010s³⁸. PURA’s Equitable Modern Grid Framework (2019) is developing a program to expand the availability of AMI throughout the rest of the state.³⁹ c. Connecticut has invested heavily in distributed energy resources, especially in solar projects through the Connecticut Green Bank.⁴⁰ DEEP/PURA issued an interim decision on how to value

				<p>DERs in setting rates for feed-in tariffs, but no final decision has been issued.⁴¹</p> <p>d. Connecticut has established a statewide goal of deploying 1,000 megawatts of energy storage by year- end 2030.⁴² However, PURA’s Equitable Modern Grid Framework calls for the following steps in the near future: (1) soliciting energy storage proposals/designs from experts and other states; (2) condensing these suggestions into a draft report; and (3) convening technical meetings/public hearings to comment on the draft report⁴³. [See Dockets No. 17-12-03RE03 and 17-12-03RE07].</p> <p>e. Public Act 18-50, §9 directs PURA to reduce statewide energy consumption by 1.6 million MMBtu annually between 2020 and 2025⁴⁴. Connecticut continues to provide millions of dollars in loans to make residential and commercial spaces more energy efficient⁴⁵. The 2019-2021 Conservation & Load Management Plan calls for a \$726 million investment in making Connecticut more energy efficient⁴⁶.</p>
H.4	Emissions Trading			
H.4.1	Does the state participate in a tradeable emissions scheme designed	<p><u>Mitigation Score:</u></p> <p>1 – The state participates in a tradeable emissions scheme designed to reduce</p>	The Regional Greenhouse Gas Initiative (RGGI) is a “cap-and-invest” scheme composed of nine New England and Mid-Atlantic states. RGGI regulates fossil-fueled power plants with a capacity of at	<p><u>Mitigation Score: 1/1</u></p> <p><u>Equity Score: N/A</u></p> <p><u>Public Health Score: 1/1</u></p> <p><u>Mitigation Score: 1/1</u></p>

<p>to reduce GHG emissions from the electricity sector?</p>	<p>GHG emissions from the electricity sector.</p> <p>0 – The state does not participate in a tradeable emissions scheme designed to reduce GHG emissions from the electricity sector.</p> <p><u>Equity Score:</u></p> <p>1 – The state participates in a tradeable emissions scheme that alleviates the environmental burdens on marginalized groups.</p> <p>0 – The state does not participate in a tradeable emissions scheme that alleviates the environmental burdens on marginalized groups.</p> <p><u>Public Health Score:</u></p> <p>1 – The state participates in a tradeable emissions scheme that reduces air pollutants associated with public health risks.</p> <p>0 – The state does not participate in a tradeable emissions scheme that reduces air pollutants associated with public health risks.</p>	<p>least 25 megawatts. To comply with RGGI, regulated entities must hold one “allowance” for every ton of CO₂ emitted over a three-year control period (interim requirements also exist at the one and two-year marks). These allowances are sold at quarterly auctions and may be held by the purchaser or re-sold between regulated entities on a monitored secondary market. Allocating allowances via auction generates hundreds of millions of dollars in revenue for member states, who typically invest the proceeds into green programs.</p> <p>Since 2008, CO₂ emissions overall⁴⁷ and those from regulated power plants specifically⁴⁸ have fallen substantially (35% and 47%, respectively) despite RGGI states outpacing the rest of the country in economic growth⁴⁹. Further, RGGI is credited as a significant boon to public health and economic productivity by improving air quality across the region⁵⁰.</p>	<p>Connecticut participates in the Regional Greenhouse Gas Initiative.</p> <p><u>Equity Score:</u> RGGI has been incredibly successful in cutting emissions and increasing health benefits. Additionally, the proceeds generated have provided significant investment in programs that increase energy efficiency and save people money. However, is unclear if such cap-and-trade programs do or do not have a disproportionate impact on local, overburdened communities.⁵¹</p> <p><u>Public Health Score: 1/1</u></p> <p>While the Regional Greenhouse Gas Initiative (RGGI) in which Connecticut participates regulates emissions of greenhouse gases, rather than criteria or hazardous pollutants, those other pollutants are co-emitted from the regulated facilities and the RGGI program has resulted in the reduction of pollutants that directly impact human health. The health benefits realized in the first six years of RGGI’s operation have been estimated at more than \$6 billion.⁵²</p>
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<p>H.4.2</p>	<p>How does the state solicit and integrate stakeholder input into its decision-making around emissions trading?</p>	<p><u>Mitigation Score:</u></p> <p>5 – The state consults with all five groups listed in criteria ‘a’ through ‘e’ to the right.</p> <p>4 – The state consults with four of the five groups listed in criteria ‘a’ through ‘e’ to the right.</p> <p>3 – The state consults with three of the five groups listed in criteria ‘a’ through ‘e’ to the right.</p> <p>2 – The state consults with two of the five groups listed in criteria ‘a’ through ‘e’ to the right.</p> <p>1 – The state consults with one of the five groups listed in criteria ‘a’ through ‘e’ to the right.</p> <p>0 – The state consults with none of the five groups listed in criteria ‘a’ through ‘e’ to the right.</p> <p><u>Equity Score:</u></p> <p>6 – The state has implemented input procedures that encompass all six of the green and turquoise-colored criteria listed to the right.</p> <p>5 – The state has implemented input procedures that encompass five of the six green or turquoise-colored criteria to the right.</p>	<p>Although RGGI harmonizes its member states’ emissions trading schemes, only the states themselves have sovereign authority to enact or alter policy. State agencies are also the primary intermediaries between affected communities and the policymakers who shape RGGI. It is therefore imperative for states to solicit meaningful feedback about emissions trading policy from its citizenry. States should consult with⁵³:</p> <ul style="list-style-type: none"> a. Public health experts [PH 1.1] b. Environmental justice advocates [EQ 5.1, 5.3] [PH 1.1, 4.1] c. Environmental organizations [PH 1.1, 4.1] d. Industry/business groups e. Electric utilities <p>To maximize public input, states should plan community meetings as inclusively as possible. Best practices to meaningfully solicit community feedback include⁵⁴:</p> <ul style="list-style-type: none"> f. Soliciting feedback from community leaders about meeting plans & outcomes [EQ 5.1, 5.3] g. Holding meetings in places easily accessible by public transit [EQ 5.1] h. Scheduling meetings outside of normal working hours [EQ 5.1] i. Providing linguistically appropriate information and/or interpretation services [EQ 5.1] j. Developing a transparent system for responding to 	<p style="text-align: right;"><u>Mitigation Score: 3/5</u> <u>Equity Score: 1/6</u> <u>Public Health Score: 1/3</u></p> <p><u>Mitigation Score:</u></p> <p>Connecticut shares very little information about its stakeholder input procedures. DEEP’s RGGI portal contains (1) a report describing two public hearings held in 2013 to solicit feedback about the newly proposed RGGI Model Rule⁵⁵ and (2) comments from various stakeholders about RGGI’s inception in 2008⁵⁶. As far as these sources show:</p> <ul style="list-style-type: none"> a. No input was gathered from public health experts. b. No input was gathered from environmental justice/energy equity advocates. c. Environmental organizations participated and offered their input. d. Business interests participated and offered their input. e. Electric utilities participated and offered their input. <p><u>Equity Score: 1/6</u></p> <p>Connecticut provides little publicly accessible information describing its efforts to solicit community feedback on RGGI. From the available information, it appears that⁵⁷:</p> <ul style="list-style-type: none"> f. There is no evidence that Connecticut solicits feedback from
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	<p>4 – The state has implemented input procedures that encompass four of the six green or turquoise-colored criteria to the right.</p> <p>3 – The state has implemented input procedures that encompass three of the six green or turquoise-colored criteria to the right.</p> <p>2 – The state has implemented input procedures that encompass two of the six green or turquoise-colored criteria to the right.</p> <p>1 – The state has implemented input procedures that encompass one of the six green or turquoise-colored criteria to the right.</p> <p>0 – The state has implemented input procedures that encompass none of the six green or turquoise-colored criteria to the right.</p> <p><u>Public Health Score:</u></p> <p>3 – The state has implemented input procedures that encompass all of criteria ‘a’, ‘b’, and ‘c’ listed to the right.</p> <p>2 – The state has implemented input procedures that encompass two of criteria ‘a’, ‘b’, and ‘c’ listed to the right.</p> <p>1 – The state has implemented input procedures that encompass one of</p>	<p>stakeholder comments/concerns [EQ 5.2, 5.3]</p>	<p>community leaders about meeting plans or outcomes.</p> <ul style="list-style-type: none"> g. There is no evidence that Connecticut plans meetings around accessibility. h. Both public hearings in 2013 were conducted in the morning or early afternoon and lasted for less than an hour each. i. There is no evidence that Connecticut prioritizes linguistic accessibility in its public meetings. j. DEEP’s report on the RGGI public hearings summarizes and methodically responds to every stakeholder’s concerns.⁵⁸ <p><u>Public Health Score:</u></p> <p>While is no publicly accessible information indicating that Connecticut consults with public health experts or environmental justice advocates, environmental non-profits are routinely consulted and included to help shape RGGI policy.</p>
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		<p>criteria ‘a’ ,‘b’, or ‘c’ listed to the right.</p> <p>0 – The state has implemented input procedures that do not encompass any of criteria ‘a’, ‘b’, or ‘c’ listed to the right.</p>		
H.4.3	<p>How does the state reinvest the revenue gathered from allowance auctions?</p>	<p><u>Mitigation Score:</u></p> <p>2 – The state’s policy encompasses both criteria ‘a’ and ‘b’ listed to the right.</p> <p>1 – The state’s policy encompasses either criterion ‘a’ or ‘b’ listed to the right.</p> <p>0 – The state’s policy encompasses neither criterion ‘a’ nor ‘b’ listed to the right.</p> <p><u>Equity Score:</u></p> <p>5 – The state’s policy encompasses all five green or turquoise-colored criteria listed to the right.</p> <p>4 – The state’s policy encompasses four of the five green or turquoise-colored criteria listed to the right.</p> <p>3 – The state’s policy encompasses three of the five green or turquoise-colored criteria listed to the right.</p> <p>2 – The state’s policy encompasses two of the five green or turquoise-colored criteria listed to the right.</p>	<p>RGGI allowance auctions provide member states with millions of dollars in annual revenue. Most states invest the bulk of these proceeds on efforts to decarbonize their economies, especially through energy efficiency and renewable energy programs. However, a few states have used RGGI windfalls to make up for budget deficits in other areas.</p> <p>a. The state invests most of its RGGI revenue in decarbonization and/or climate mitigation programs⁵⁹.</p> <p>b. The state does not draw from its RGGI revenue to cover budget shortfalls in other areas⁶⁰.</p> <p><i>As noted in column H.4.1 above, RGGI tends to concentrate air pollution in already overburdened communities. EJ advocates and state agencies have proposed several ways to reinvest RGGI funds to mitigate this cumulative environmental burden. The most common of these proposals include:</i></p> <p>c. <i>Conduct proximity & cumulative-impact analyses to evaluate air pollution in EJ communities⁶¹ [EQ 1.1, 4.1 4.2] [PH. 1.1, 1.3]</i></p> <p>d. <i>Provide direct bill-pay assistance for low-income residents⁶² [EQ 2.1]</i></p>	<p><u>Mitigation Score: 1/2</u> <u>Equity Score: 0/5</u> <u>Public Health Score: 0/3</u></p> <p>a. Between 2008 and 2017, Connecticut received \$187 million in proceeds from RGGI auctions⁶⁶. 64.3% of this money was invested in energy efficiency programs, while 28.3% was spent on clean energy projects⁶⁷. 6.7% was reserved for DEEP’s administration costs.</p> <p>b. In 2017, the Connecticut legislature transferred 52% of its RGGI revenue (~\$13.5 million) to the state’s general fund to resolve budget deficits in other areas⁶⁸.</p> <p>c. <i>There is no evidence that Connecticut intends to conduct proximity or cumulative-impact analyses to evaluate RGGI’s effect on its EJ communities.</i></p> <p>d. <i>Connecticut does not spend its RGGI proceeds on direct bill-pay assistance for low-income residents⁶⁹.</i></p> <p>e. <i>R.C.S.A. §22a-174-31 enacts RGGI policy into Connecticut law. This section does not authorize DEEP to direct RGGI funds into</i></p>

	<p>1 – The state’s policy encompasses one of the five green or turquoise-colored criteria listed to the right.</p> <p>0 – The state’s policy encompasses none of the five green or turquoise-colored criteria listed to the right.</p> <p>Public Health Score:</p> <p>3 – The state’s policy encompasses all three of criteria ‘c’, ‘e’, and ‘g’ listed to the right.</p> <p>2 – The state’s policy encompasses two of criteria ‘c’, ‘e’, and ‘g’ listed to the right.</p> <p>1 – The state’s policy encompasses one of criteria ‘c’, ‘e’, and ‘g’ listed to the right.</p> <p>0 – The state’s policy encompasses none of criteria ‘c’, ‘e’, and ‘g’ listed to the right.</p>	<p>e. Direct funds for distributed energy resources to vulnerable communities⁶³ [EQ 3.1, 5.3] [PH. 5.1]</p> <p>f. Provide transition assistance for fossil fuel industry workers⁶⁴ [EQ 1.1, 5.3]</p> <p>g. Incorporate statutory language mandating direct investment of RGGI proceeds in EJ communities⁶⁵ [EQ 1.1, 4.1, 4.2] [PH 1.1, 1.3, 5.1]</p>	<p>distributed energy resources for EJ communities⁷⁰.</p> <p>f. R.C.S.A. §22a-174-31 does not authorize DEEP to spend RGGI funds on transition assistance for fossil fuel workers⁷¹.</p> <p>g. R.C.S.A. §22a-174-31 does not mandate direct investment of RGGI proceeds in EJ communities⁷².</p>
Section H Mitigation Total		25/35 ~71.4%	
Section H Health Total		4/12 ~33.3%	
Section H Equity Total		2/16 ~12.5%	

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² Ibid.

³ Ibid.

⁴ Ibid.

⁵ Ibid.

⁶ Ibid.

⁷ Ibid.

⁸ N.Y. Pub. Serv. Communication. (2016). “Order Establishing the Benefit Cost Analysis Framework, Case 14-M-0101”.

<http://documents.dps.ny.gov/public/Common/ViewDoc.aspx?DocRefId=%7BF8C835E1-EDB5-47FF-BD78-73EB5B3B177A%7D>

⁹ United States Environmental Protection Agency. (2015). “EPA Energy and Environment Guide to Action, Chapter 7: Electric Utility Policies”.

https://www.epa.gov/sites/production/files/2017-06/documents/guide_action_chapter7.pdf

¹⁰ Ibid.

¹¹ CT Gen. Stat. § 16a-3a(d)(4) (2013). <https://law.justia.com/codes/connecticut/2013/title-16a/chapter-295/section-16a-3a>

¹² New York Lawyers for the Public Interest. (2018). “Comments of the Aligned Parties on Staff LMI CDG Proposal”. In the Matter of the Value of Distributed Energy Resources (Case 15-E-0751). <http://documents.dps.ny.gov/public/MatterManagement/CaseMaster.aspx?MatterSeq=53799&MNO=17-01278>.

¹³ Ibid.

¹⁴ New York City Environmental Justice Alliance. (2018). “NYC Climate Justice Agenda: Midway to 2030, Building Resiliency and Equity for a Just Transition”.

<https://www.nyc-eja.org/wp-content/uploads/2018/04/NYC-Climate-Justice-Agenda-Final-042018-1.pdf>

¹⁵ Gundlach, J. & Unel, B. (2019). “Getting the Value of Distributed Energy Resources Right: Using a Societal Value Stack”. Institute for Policy Integrity, NYU School of Law.

https://policyintegrity.org/files/publications/Value_of_DER_Report.pdf

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¹⁷ New York City Environmental Justice Alliance. (2018). “NYC Climate Justice Agenda: Midway to 2030, Building Resiliency and Equity for a Just Transition”.

<https://www.nyc-eja.org/wp-content/uploads/2018/04/NYC-Climate-Justice-Agenda-Final-042018-1.pdf>

⁽ⁱⁱ⁾ CT Public Act 19-35, §6 (2019). <https://www.cga.ct.gov/2019/ACT/pa/pdf/2019PA-00035-R00HB-05002-PA.pdf>.

⁽ⁱⁱⁱ⁾ Steinberg et al. (2019). “State of Connecticut General Assembly Letter Re: Docket No. 19-06-29, DEEP and PURA Joint Proceeding on the Value of Distributed Energy Resources”.

[http://www.dpuc.state.ct.us/dockcurr.nsf/8e6fc37a54110e3e852576190052b64d/b96d431abf3cb69e8525849000537b85/\\$FILE/97621316.pdf/VDER_lawmaker%20letter.pdf](http://www.dpuc.state.ct.us/dockcurr.nsf/8e6fc37a54110e3e852576190052b64d/b96d431abf3cb69e8525849000537b85/$FILE/97621316.pdf/VDER_lawmaker%20letter.pdf)

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¹⁹ Glick, M., Heeter, J., & Speer, B. (2019). “International Best Practices for Implementing and Designing Renewable Portfolio Standards (RPS) Policies”. National Renewable Energy Laboratory and Hawaii Natural Energy Institute. <https://www.nrel.gov/docs/fy19osti/72798.pdf>

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²¹ Ibid.

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²⁶ CT Gen. Stat. §16-245a (2013). https://www.cga.ct.gov/current/pub/chap_283.htm#sec_16-245a

²⁷ CT Gen. Stat. §16-244c (2012). https://www.cga.ct.gov/current/pub/chap_283.htm#sec_16-244c

²⁸ CT Gen. Stat. §16-1 (2012). <https://law.justia.com/codes/connecticut/2012/title-16/chapter-277/section-16-1>

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https://www.energy.gov/sites/prod/files/2016/10/f33/Climate%20Change%20and%20the%20Electricity%20Sector%20Guide%20for%20Climate%20Change%20Resilience%20Planning%20September%202016_0.pdf.

³⁰ Ibid.

³¹ Ibid.

³² Ibid.

³³ Ibid.

³⁴ Ibid.

³⁵ CT Public Act 12-148, §7 (2012). <https://www.cga.ct.gov/2012/ACT/Pa/pdf/2012PA-00148-R00SB-00023-PA.pdf>

³⁶ Connecticut Department of Energy and Environmental Protection. (2020). “Microgrid Grant and Loan Program”. <https://portal.ct.gov/DEEP/Energy/Microgrid-Grant-and-Loan/Microgrid-Grant-and-Loan-Program>

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https://smartgrid.gov/project/connecticut_municipal_electric_energy_cooperative_connecticut_municipal_electric_energy.html

³⁹ Public Utilities Regulatory Authority, Docket No. 17-12-03RE02.

⁴⁰ See CT Public Act 15-194 (2015). <https://www.cga.ct.gov/2015/ACT/pa/pdf/2015PA-00194-R00HB-06838-PA.pdf> (establishing the Solar Home Renewable Energy Credit program); Connecticut Green Bank’s “Solar for All” partnership; CT Public Act 18-50 (2018). <https://www.cga.ct.gov/2018/act/pa/pdf/2018PA-00050-R00SB-00009-PA.pdf> (replacing net metering with feed-in tariff to compensate DERs).

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⁴² Public Act 21-53.

⁴³ Ibid.

⁴⁴ CT Public Act 18-50, §9 (2018). <https://www.cga.ct.gov/2018/act/pa/pdf/2018PA-00050-R00SB-00009-PA.pdf>

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⁵² Bruce Ho, “The Regional Greenhouse Gas Initiative is a Model for the Nation,” NRDC (July 14, 2021), <https://www.nrdc.org/resources/regional-greenhouse-gas-initiative-model-nation>.

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