

December 3, 2021

Connecticut Department of Energy & Environmental Protection
Bureau of Energy & Technology Policy
10 Franklin Square
New Britain, CT 06051
Via email: DEEP.EnergyBureau@ct.gov

Re: Comments on the 2022-24 Conservation and Load Management Plan

Thank you for the opportunity to provide written comments regarding the 2022-2024 Conservation and Load Management (C & LM) Plan. The undersigned organizations urge DEEP to end incentives for gas equipment in the C & LM Plan. This request applies to all aspects of the C & LM Plan including residential, commercial, new construction, and retail programs. In light of the increasingly urgent need to reduce greenhouse gas emissions as quickly as possible, and DEEP's own conclusion that Connecticut is not on track to meet its 2030 or 2050 emissions reduction targets required under the Global Warming Solutions Act,¹ continuing gas incentives in the C & LM Plan is counterproductive and insupportable.

Two hundred and thirty two individuals and organizations submitted public comments to the Energy Efficiency Board (EEB), with 95% of those requesting in some way that incentives for gas equipment such as gas hot water heaters, boilers, and furnaces be eliminated in the final plan. These comments are available in the public record. Despite these requests for the removal of gas incentives, the utility companies and the EEB did not address this request in their official response to comments. The C & LM Plan does nothing to end incentives for gas in any programs, nor does it plan a phase down of gas subsidies.

Nineteen organizations also made this request directly to Commissioner Dykes in [a letter dated August 27, 2021](#) and sent by email. As noted in the letter, the Commissioner of DEEP has the final authority under Conn. Gen. Stat. § 16-245m(d)(1) to approve, modify, or reject the draft C & LM Plan, and we urge the Commissioner to remove all gas incentives from the 2022-2024 C & LM Plan.

The rising price of fossil gas also makes this an important moment to end gas incentives. The transition from gas to clean energy in homes can lock in more affordable and stable energy bills, along with climate and health benefits.

Notably, Massachusetts just made significant changes to their [three-year energy efficiency plan](#) in response to criticism that the draft plan was inadequate to meet the state's decarbonization targets. The updated plan includes increased measures to electrify the buildings sector, allocating \$800 million towards residential electrification. It also calls for the installation of 54,000 residential heat pumps, including 6,650 income-eligible projects, and 34.1 million square

¹ CT DEEP, *2018 Connecticut Greenhouse Gas Emissions Inventory*, at 2, https://portal.ct.gov/-/media/DEEP/climatechange/GHG_Emissions_Inventory_2018.pdf.

feet in the commercial and industrial (C&I) sector, and commits to all-electric new construction in the residential and C&I sectors.

The Maryland Commission on Climate Change recently published a [Buildings Energy Transition Plan](#) to achieve net-zero emissions from the building sector by 2045 that, among other items, will sunset financial subsidies for fossil fuel appliances within EmPOWER (the state energy efficiency program), and will encourage fuel-switching and beneficial electrification through EmPOWER beginning in 2024. The plan also aims for 50 percent of residential heating systems, cooling systems, and water heater sales to be heat pumps by 2025, and 95 percent by 2030.

The C & LM Plan is the best tool the state has to decarbonize the building sector by incentivizing electrification efforts. It can drive the market towards electrification, but not as currently drafted. Continuing gas incentives locks in decades more emissions and postpones the building electrification needed to address the climate crisis and meet Connecticut's climate goals. We urge the Commissioner to end gas incentives in the 2022 - 2024 C & LM Plan.

Sincerely,

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Susan Eastwood, Chair
Arthur Helmus, Legislative Chair
Sierra Club Connecticut

Tom Swan Executive Director
Connecticut Citizen Action Group (CCAG)

Alicia Dolce, Executive Director
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