



**Connecticut Chapter**  
**P.O. Box 270595**  
**West Hartford, Connecticut 06127**  
connecticut.sierraclub.org

August 27, 2020

Jeffrey R. Gaudiosi, Esq.  
Executive Secretary  
Public Utilities Regulatory Authority  
10 Franklin Square  
New Britain, CT 06051

Re: Docket No. 20-06-22 Application of Yankee Gas Services Company for Approval of a Special Contract

Dear Mr. Gaudiosi,

On behalf of Sierra Club's more than 40,000 members and supporters in Connecticut, thank you for providing this opportunity to comment on the Application of Yankee Gas Services Company dba Eversource for Approval of a Special Contract. We appreciate your consideration of the following items of concern our organization has about this contract:

***Gas expansion is out of alignment with Connecticut's Global Warming Solutions Act (GWSA)***

The scale of the climate crisis is unprecedented, and our response must be as well. In recognition of this, Connecticut lawmakers passed the GWSA to reduce climate-destroying greenhouse gas emissions 45% below 2001 levels by 2030, and 80% by 2050. This contract flies in the face of the GWSA, and proposes to expand gas infrastructure and increase fossil gas combustion in Connecticut.

The dangers of fossil gas to the climate are well documented; fossil gas has been identified as a major driver of the climate crisis.<sup>1</sup> Methane, a dangerous greenhouse gas, is the chief component of fossil gas. It is a short-term pollutant that is 84 times more potent in heating the atmosphere than carbon dioxide in the first 20 years.<sup>2</sup> Increasing its use here in Connecticut fails to align with the GWSA.

***New gas infrastructure and increase of gas is not needed***

Analysis by Synapse Energy Economics shows that the gas plant served by this contract is not needed even considering potential retirement of so-called "at risk" power plants.<sup>3</sup> A study by the

---

<sup>1</sup> Howarth, R. W.: Ideas and perspectives: is shale gas a major driver of recent increase in global atmospheric methane?, Biogeosciences, 16, 3033–3046, <https://doi.org/10.5194/bg-16-3033-2019>, 2019.

<sup>2</sup> Environmental Defense Fund, Methane: The other important greenhouse gas, <https://www.edf.org/climate/methane-other-important-greenhouse-gas> (last visited Jan. 20, 2020).

<sup>3</sup>

[https://portal.ct.gov/-/media/CSC/1\\_Dockets-medialibrary/Docket\\_470B/Prefiled\\_exhibits/grouped/DO470B20190411NAPPSCTestimonyFaganGlickpdf.pdf](https://portal.ct.gov/-/media/CSC/1_Dockets-medialibrary/Docket_470B/Prefiled_exhibits/grouped/DO470B20190411NAPPSCTestimonyFaganGlickpdf.pdf)

Acadia Center concludes that under current plans and laws, New England's reliance on fossil gas to fuel power plants could drop from 45% to approximately 10% of its electricity needs in 2030, making any investment in new gas pipelines or plants unnecessary and therefore costly.<sup>4</sup> Per the requirements of Connecticut General Statutes Section 16-19e(a)(1), PURA must determine that there is a clear public need for the service being proposed or provided. Given that the electric capacity from this plant is not needed at present, and that the state must begin phasing out electricity from fossil fuels to comply with the GWSA and to reach Governor Lamont's 100% carbon-free power by 2040 target, there is no clear public need for this service.

### ***Risk to ratepayers***

In addition to the possibility that ratepayers will end up subsidizing the cost of this project, the contract would increase risk to ratepayers of funding stranded infrastructure and exposure to the price effects of gas. Because this contract increases the use of gas, it increases the exposure of customers to the price effects of gas, which is already an issue due to over reliance on gas in the region.<sup>5</sup> Additionally, implementation of Connecticut's climate and clean energy policies, including the GWSA and Governor Lamont's Executive Order 3, mean that fossil gas infrastructure built today will be squeezed out by renewables, exposing ratepayers to stranded costs.

### ***Holding Connecticut back from real solutions to climate and resiliency***

This contract proposed by Eversource's Yankee Gas will serve to expand and increase a centralized fossil fuel approach to energy at a time when we need to use less fossil fuels and invest in more distributed energy to increase resiliency from weather events driven by climate change.

Thank you for your consideration of our comments, and we look forward to continuing the discussion about meeting Connecticut's climate and clean energy goals.

Sincerely,



Samantha Dynowski, State Director  
Sierra Club Connecticut

---

<sup>4</sup> <https://acadiacenter.org/document/the-declining-role-of-natural-gas-power-in-new-england/>

<sup>5</sup>

[https://portal.ct.gov/-/media/CSC/1\\_Dockets-medialibrary/Docket\\_470B/Prefiled\\_exhibits/grouped/DO470B20190411NAPPSCTestimonyFaganGlickpdf.pdf](https://portal.ct.gov/-/media/CSC/1_Dockets-medialibrary/Docket_470B/Prefiled_exhibits/grouped/DO470B20190411NAPPSCTestimonyFaganGlickpdf.pdf)