



August 12, 2020

**VIA ELECTRONIC MAIL**

Connecticut Dept. of Energy and Env'tl. Protection  
79 Elm Street  
Hartford, CT 06106  
Email: DEEP.mobilesources@ct.gov

**RE: Comments on Connecticut Hydrogen and Electric Automobile Purchase Rebate (CHEAPR) Program Design**

To Whom It May Concern:

On behalf of its more than 11,000 members in Connecticut, the Sierra Club respectfully submits the following comments in response to the Department of Energy and Environmental Protection's (DEEP) request for public comment on certain aspects of the Connecticut Hydrogen and Electric Automobile Purchase Rebate (CHEAPR) program.

The Sierra Club applauds DEEP's efforts to increase electric vehicle (EV) adoption in Connecticut. Based on the analysis included in the Governor's Council on Climate Change (GC3) final recommendations, the state will need to deploy 500,000 light-duty electric vehicles by 2030 in order to ensure the transportation sector is on track to achieve its share of the state's 45% by 2030 greenhouse gas (GHG) reduction target.<sup>1</sup> Incentivizing adoption of EVs through the CHEAPR program is perhaps the most critical step DEEP can take to achieve the necessary level of EV deployment. A 2019 Synapse study examining transportation electrification in New York found that rebates, which reduce the upfront cost of EVs relative to internal combustion engine (ICE) vehicles, had the largest effect on EV sales of all interventions modeled.<sup>2</sup>

The Sierra Club commends the inclusion of a used EV rebate available to low- and middle-income (LMI) consumers. Equitable access to clean transportation for LMI communities must be a central tenet of any transportation electrification plan, as these communities have been disproportionately burdened by transportation emissions resulting from more polluting and health-harming vehicles and heavy traffic. Providing the used EV rebate exclusively to LMI consumers will facilitate more equitable EV ownership and is an important step in supporting LMI communities and increasing access to the benefits of clean transportation.

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<sup>1</sup> Governor's Council on Climate Change, Building a Low Carbon Future for Connecticut, December 18, 2018, p. 28.

<sup>2</sup> Transforming Transportation in New York: Roadmaps to a Transportation Climate Target for 2035, Synapse Energy Economics, September 2019, p. 9.

The Sierra Club supports the addition of a rebate for e-bikes to the CHEAPR program and proposes that the rebate be limited to LMI consumers. Car ownership rates are lower in LMI and underserved communities in Connecticut. E-bikes provide a more affordable option for LMI consumers to access the benefits of electrified transportation and are more likely to serve as a primary method of transportation for LMI commuters. Given the limited funding available for the CHEAPR program, DEEP should seek additional funding both to extend the life of the program overall and to expand the rebate offerings to include e-bikes.

DEEP should consider reducing the fuel cell electric vehicle (FCEV) rebate to the same amount as the maximum battery electric vehicle (BEV) rebate, as there is no unique environmental benefit to FCEVs that makes them preferable to BEVs. If BEVs above a cost of \$42,000 are excluded from the CHEAPR program because consumers buying vehicles in this price range presumably have sufficient ability to pay, it seems unnecessary to provide an outsize incentive for FCEVs at that price point.

Sierra Club also inquires as to the reasoning for inclusion of a tiered rebate that differentiates between BEVs with a range greater than 200 miles and those with a range of less than 200 miles. If DEEP has determined that range is an accurate proxy for determining whether EVs are a consumer's primary mode of transportation or a secondary vehicle, which would be driven less frequently, then such a distinction might be appropriate. If range is not a proxy for secondary vehicles then DEEP should consider providing the same incentive for all BEVs, as any mile driven in a BEV provides emissions reduction benefits.

Finally, the Sierra Club urges DEEP to consider raising the rebate amount for BEVs to \$2,500. The CHEAPR program historically offered more robust rebates of up to \$3,000 in 2015-2018, and up to \$2,000 in 2018-2019. Connecticut would fall well behind neighboring states in offering a rebate of \$1,500 for BEVs: New Jersey offers a rebate of up to \$5,000,<sup>3</sup> Massachusetts offers a rebate of \$2,500,<sup>4</sup> New York offers a rebate of up to \$2,000,<sup>5</sup> Vermont offers a base incentive of \$2,500,<sup>6</sup> Maine offers a base incentive of \$2,000,<sup>7</sup> and Delaware offers a rebate of \$2,500.<sup>8</sup> At the very least, Connecticut should aim to offer a rebate on par with those offered by neighboring states, especially given modeling that shows reductions in purchase price of EVs are the most effective tool available to accelerate EV deployment.<sup>9</sup>

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<sup>3</sup> New Jersey Board of Public Utilities, Charge Up New Jersey, <https://chargeup.njcleanenergy.com/> (last visited Aug. 12, 2020).

<sup>4</sup> Massachusetts Dept. of Energy Resources, MOR-EV: Massachusetts Offers Rebates for Electrified Vehicles, [https://mor-ev.org/sites/default/files/docs/MOR-EV\\_Program\\_Overview.pdf](https://mor-ev.org/sites/default/files/docs/MOR-EV_Program_Overview.pdf).

<sup>5</sup> NYSERDA, Drive Clean Rebate for Electric Cars, <https://www.nyseda.ny.gov/All-Programs/Programs/Drive-Clean-Rebate/How-it-Works> (last visited Aug. 12, 2020).

<sup>6</sup> Vermont Agency of Transportation, Drive Electric Vermont, <https://www.driveelectricvt.com/why-go-electric/purchase-incentives>, (last visited Aug. 12, 2020).

<sup>7</sup> Efficiency Maine, Electric Vehicle Rebate Eligibility, <https://www.efficiencymaine.com/ev/rebate-eligibility/> (last visited Aug. 12, 2020).

<sup>8</sup> Delaware Department of Natural Resources and Environmental Control, The Delaware Clean Vehicle Rebate Program, <https://dnrec.alpha.delaware.gov/climate-coastal-energy/clean-transportation/vehicle-rebates/> (last visited Aug. 12, 2020).

<sup>9</sup> Transforming Transportation in New York: Roadmaps to a Transportation Climate Target for 2035, Synapse Energy Economics, September 2019, p. 9.

Respectfully submitted,

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