



February 16, 2021

**VIA ELECTRONIC MAIL**

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

**RE: Volkswagen Diesel Emission Mitigation Program and Electric Vehicle Supply Equipment Program**

To Whom It May Concern:

On behalf of its 40,000 members and supporters in Connecticut, Sierra Club respectfully submits the following comments in response to the Department of Energy and Environmental Protection's (DEEP's) January 22, 2021 Notice of Request for Written Comments relating to the third round of funding under the Volkswagen (VW) Diesel Emission Mitigation Program and the first round of funding under the VW Electric Vehicle Supply Equipment (EVSE) Program.

Sierra Club applauds DEEP's initiation of a third round of Vehicle Program funding and commencement of the EVSE Program and emphasizes that VW funds should be used to encourage transportation electrification in Connecticut. Connecticut's greenhouse gas (GHG) emission reduction mandates under the Global Warming Solutions Act (GWSA) require a 45 percent reduction in greenhouse gas emissions by 2030 and an 80 percent reduction by 2050. Connecticut's most recent GHG inventory highlights the necessity of reducing emissions from the transportation sector, which accounts for 38 percent of Connecticut's GHG emissions, to achieve these targets.<sup>1</sup> The Governor's Council on Climate Change (GC3) calculated that 30 percent of buses and trucks would need to be zero-emission to achieve the GWSA's target of 45 percent reduction in emissions by 2030 in the transportation sector.<sup>2</sup> Further, Connecticut is a signatory to the Multi-State Medium- and Heavy-Duty Zero Emission Vehicle MOU (MHD ZEV MOU)<sup>3</sup> which directs that at least 30 percent of new medium- and heavy-duty sales be zero emission vehicles by 2030. DEEP should ensure the Vehicle Program funds are used for electric replacements to assist the state in meeting these targets.

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<sup>1</sup> DEEP, 2017 GHG Inventory, [https://portal.ct.gov//media/DEEP/climatechange/2017\\_GHG\\_Inventory/2017\\_GHG\\_Inventory.pdf](https://portal.ct.gov//media/DEEP/climatechange/2017_GHG_Inventory/2017_GHG_Inventory.pdf).

<sup>2</sup> Building a Low Carbon Future for Connecticut: Recommendations from the Governor's Council on Climate Change, <https://portal.ct.gov//media/DEEP/climatechange/publications/BuildingaLowCarbonFutureforCTGC3Recommendationspdf.pdf>, p. 28.

<sup>3</sup> Multi-State Medium- and Heavy-Duty Zero Emission Vehicle Memorandum of Understanding, <https://portal.ct.gov/-/media/DEEP/air/mobile/EVConnecticut/2020-07-14---Mulit-State-MHD-ZEV-MOU.pdf>.

Transportation electrification will also help alleviate transportation pollution that currently jeopardizes the health and wellbeing of Connecticut's residents. Poor air quality is contributing to a health crisis disproportionately impacting Black, Brown and low-income communities with acute and chronic respiratory problems such as asthma, Chronic Obstructive Pulmonary Disease, and other lung diseases. The American Lung Association calculates that a widespread transition to zero-emission transportation in the United States could produce emissions reductions by 2050 that could add up to \$72 billion in avoided health harms, saving approximately 6,300 lives and avoiding more than 93,000 asthma attacks and 416,000 lost workdays annually due to significant reductions in transportation-related pollution. In Connecticut, that would mean over \$637 million in avoided health harms, 55 lives saved, and 726 asthma attacks and 3,479 lost workdays avoided.

### ***Vehicle Program***

Given the climate and public health benefits of transportation electrification and Connecticut's aggressive climate goals, Sierra Club urges DEEP to limit the third round of Vehicle Program exclusively to electric vehicles. An all-electric third round of funding would help Connecticut meet its commitments under the GWSA and the MHD ZEV MOU and would help alleviate harmful pollution from the transportation sector. DEEP notes that it seeks to maximize the number of electrification proposals but is considering making funding available for all project types, while giving electric projects first consideration. While such prioritization of electric projects is helpful, DEEP's goals would be better served if the agency were to simply limit this round of funding exclusively to electric proposals, with any leftover funds allocated to future rounds of funding. The two prior rounds of Vehicle Program funding were dominated by proposals to replace old diesel vehicles with updated diesel vehicles—a disappointing result for a program that can make a meaningful difference for the deployment of EVs in Connecticut. DEEP should ensure this third round of funding does not result in the same outcome by limiting proposals to electric replacements. Limiting eligibility to electric replacements would also send an important signal to entities developing proposals that their proposals *must* focus on electrification.

### ***EVSE Program***

Sierra Club supports DEEP's proposal to allocate \$2 million of EVSE Program funds to direct current fast charging (DCFC) infrastructure. A focus on DCFC is merited as DCFC is a key strategy for increasing driver comfort with purchasing EVs and reducing range anxiety but has proven to be a hard-to-reach sector, with utility programs failing to meet deployment targets for DCFC and potential site hosts citing the upfront cost of EVSE equipment as a primary barrier to deployment of DC fast chargers.<sup>4</sup> Sierra Club urges DEEP to reconsider the \$500,000 reserved for a hydrogen refueling station and redirect that money to DCFC infrastructure, as

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<sup>4</sup> See e.g. Massachusetts D.P.U. 15-122, Eversource Grid Modernization Plan 2019 Annual Report, April 1, 2020. In Massachusetts, Eversource found that in the first two years of its Make Ready Program in 2018-2019, through which no upfront incentives were offered, deployment of DCFC and of Level 2 infrastructure at multi-unit dwellings was largely unsuccessful. Of 125 sites installed in the first two years of the program, only 6 sites were located at multi-unit dwellings and only a single DCFC site was built. The company reported that the upfront cost of EVSE, as well as the burden of demand charges, were the two primary barriers to site host interest in installing DCFC infrastructure.

there are too few hydrogen fuel cell cars to warrant such an investment. DEEP should focus on supporting DCFC projects not only in transit corridors but also in areas with a high density of multi-unit dwellings (MUDs) to support neighborhood charging for MUD residents. DEEP should also aim to coordinate deployment of the VW funds with the utility programs being developed in Docket No. 17-12-03RE04.

Sierra Club supports DEEP's prioritization of projects in environmental justice (EJ) communities and communities that have historically borne a disproportionate share of the adverse impacts of air pollution. To that end, DEEP should prioritize project proposals from EJ community members in this round of funding. Prior to future rounds of funding, DEEP should initiate a stakeholder process to engage with EJ communities to better understand their transportation needs and should earmark a percentage of available funding to be directed to those communities. DEEP should also incorporate lessons learned from the LMI Customer Electrified Mobility Study that will be undertaken in Docket No. 17-12-03RE04 to inform priorities in future rounds of funding.

Respectfully submitted,

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