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January 6, 2021

Connecticut Department of Energy & Environmental Protection  
Office of Climate Planning  
79 Elm Street  
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Via email: [deep.climatechange@ct.gov](mailto:deep.climatechange@ct.gov)

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 Governor's Council on Climate Change (GC3) Draft Phase 1 Report on Near-Term Actions. We are also submitting comments through the survey tool.

Thanks to Governor Lamont for reconvening the GC3 through Executive Order 3 and the many organizations and advocates who participated and spent countless hours developing recommendations. We particularly applaud the emphasis on centering equity and environmental justice to ensure that planning, decision-making and implementation is just and equitable.

In our previous comments on the draft working group reports, we urged bold and immediate action to achieve the 45% reduction in greenhouse gas emissions from 2001 levels by 2030 and an 80% reduction by 2050 called for by Connecticut statute. While we support many recommendations in this report as important strategies to achieve greenhouse gas reductions, our state needs to establish a goal of **100% zero-emission electricity, transportation and buildings that centers distributed equity and creates good jobs**. This recommendation would tie together the various sectors and set a clear and bold direction for the state. Connecticut would join with other states and cities that have committed to a just and equitable transition to clean and renewable energy. We continue to urge the inclusion of such a goal in this document.

A key area of concern is the absence of strategies to address a major environmental issue facing the state - the continued approval of fossil fuel infrastructure by DEEP and other decision making bodies like the Connecticut Siting Council. Governor Lamont's goal of zero carbon electricity by 2040 cannot be achieved if DEEP continues to approve fossil fuel generation. In 2020 alone, DEEP tentatively approved permits and certifications that will allow a 650 MW fossil gas power plant to be constructed in Killingly and 375 MW to be constructed in Middletown. These approvals are inconsistent with the climate goals of the state and our energy needs. Connecticut has produced more electricity than it needs since 2009. The excess power is sent to other states.<sup>1</sup> And, over the last 10 years fossil gas generation has more than doubled.

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<sup>1</sup> U.S. EIA, Connecticut Electricity Profile, 2018, Table 10, Supply and disposition of electricity, 1990 through 2018

To address the Killingly and Middletown power plants specifically, the GC3 should make a recommendation to **suspend any further approvals of these unnecessary and destructive dirty power plants from moving forward**. To address future fossil fuel infrastructure proposals, the draft report should include the Cross-Sector working group recommendation to **require regulatory programs and state decision-making take into account their impact on meeting Connecticut's GHG emissions-reduction goals, and that they account for health and social cost impacts, including co-benefits of non-CO2 pollutants**. Notably, neighboring New York has enacted the Climate Leadership and Protection Act that includes a provision (Section 7(2))<sup>2</sup> that requires all state agency decision-making to ensure consistency with the state's climate commitments. This recommendation is a critical near-term action that was inexplicably left out of this draft report.

We want to make specific note of two recommendations that we strongly support:

**Recommendation 9c - Develop a strategic plan for transitioning from fossil fuels to renewable thermal technology.**

Sierra Club supports this planning to create an orderly, just and equitable transition from fossil fuels to zero emission all-electric heat pumps. Other states have also recognized the need to do this transition planning including California, New York, Colorado and Massachusetts.

This strategic plan should set end dates for expansion of the gas grid and new gas installations on the existing grid; it should also incorporate recommendations on how to retire the system to fully transition off fossil gas by 2050 or sooner with interim targets that align with the GWSA; it should anticipate environmental justice and labor impacts, and identify steps to mitigate those impacts. Analyses from other states suggest that with careful planning there will be benefits to retirement of the gas system beyond greenhouse gas reductions. While labor impacts specific to Connecticut need to be assessed, a 2019 study in California indicated that retirement of the gas system will create over 100,000 full-time equivalent jobs in the state, even after accounting for losses in the fossil fuel industry.<sup>3</sup>

It should be noted that we have grave concerns about strategies centered around so-called "renewable natural gas" and other fossil gas alternatives, which lack the demonstrated emissions, availability, and cost benefits of electric heat pumps. California has recognized the insufficiency of biogas as a long-term solution to the state's climate goals.

**Recommendation 7c - Improve the ability of efficiency programs to overcome health, safety, and legal issues that are barriers to efficiency upgrades.** We recommend<sup>4</sup> that DEEP improves the ability to overcome barriers by integrating the various programs for homes, especially low-income programs, into a comprehensive approach through the CL & M Home Energy Solutions and Home Energy Solutions Income-Eligible programs. An integrated, comprehensive program would couple energy efficiency retrofits with removal of health and safety barriers, and replacement of fossil fuel

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<sup>2</sup> <https://legislation.nysenate.gov/pdf/bills/2019/S6599>

<sup>3</sup> Betony Jones, et al., California Building Decarbonization: Workforce Needs and Recommendations, November 2019.

<sup>4</sup> [https://66f28e57-02e8-44f5-8613-feb302092242.usrfiles.com/ugd/66f28e\\_7cbac376d92142fb918518beac823206.pdf](https://66f28e57-02e8-44f5-8613-feb302092242.usrfiles.com/ugd/66f28e_7cbac376d92142fb918518beac823206.pdf)

burning equipment and appliances with high efficiency electric alternatives. A comprehensive program that combines energy efficiency and weatherization with these measures will address equity issues while aligning with the climate goals of the state. Connecticut should maximize the use of WAP and LIHEAP funds for this purpose.

Thank you for consideration of our comments.

Sincerely,

A handwritten signature in blue ink that reads "Samantha Dynowski". The signature is written in a cursive, flowing style.

Samantha Dynowski, State Director  
Sierra Club Connecticut