

December 21, 2017

The Honorable Rob Klee, Commissioner  
CT Department of Energy and Environmental Protection  
79 Elm Street, Hartford, CT 06106-5127

**Re: Connecticut Draft Comprehensive Energy Strategy and urgent need to accelerate expansion of EV infrastructure and incentives through recommendations in the Comprehensive Energy Strategy**

Dear Commissioner Klee:

We, the undersigned legislators, write to urge the Department of Energy and the Environment to fast-track recommendations in the Draft Comprehensive Energy Strategy (CES) that will accelerate the transition to electric vehicles (EVs). While we applaud DEEP's efforts in the Draft CES, we believe our state can and should do more to support the market for clean vehicles without delay. We call on DEEP to make final and specific recommendations in the final CES on long term funding for Connecticut's successful EV incentive program, expand EV charging infrastructure, define a clear role for electric companies in supporting EVs, and fund clean transportation efforts by limiting, pricing, and reducing carbon pollution from transportation.

**Background**

The update to Connecticut's CES comes at a crucial time. Connecticut's counties received failing grades from the American Lung Association for the number of high ozone days in 2016<sup>1</sup>, and transportation fuels are a major contributor of the pollution that causes smog problems. Transportation is now the largest source of carbon pollution in Connecticut, accounting for 43% of climate-disrupting emissions<sup>2</sup>. We need to quickly transition away from dirty fossil fuels to improve our health and environment.

Connecticut's Global Warming Solutions Act (GWSA) committed the state to cut its climate-disrupting pollution by 80% from 2001 levels by 2050. The pathway to achieve Connecticut's important climate protection goals is now being mapped by the Governor's Climate Change Council (GC3). According to analysis done for the GC3, Connecticut's economy is predicted to gain \$17 billion in cumulative net benefits by 2050 if the Legislature's climate protection goals are met, particularly due to switching to nearly all electric vehicles<sup>3</sup>. A switch to EVs presents a critical opportunity to grow our economy, create jobs, slash pollution, reduce oil dependence, and improve public health. Sales of electric cars are growing, but we need more EV-friendly policies to encourage a faster transition to an electrified transportation system.

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<sup>1</sup> American Lung Association, *State of the Air 2016*, page 64, <http://www.lung.org/assets/documents/healthy-air/state-of-the-air/sota-2016-full.pdf> .

<sup>2</sup> U.S. Energy Information Administration. *2014 State Carbon Dioxide Emissions*, <https://www.eia.gov/environment/emissions/state/> .

<sup>3</sup> M.J. Bradley & Associates, *Electric Vehicle Cost-Benefit Analysis: Plug-in Electric Vehicle Cost-Benefit Analysis; Connecticut* (Dec. 2016), available at [http://mjbradley.com/sites/default/files/PA\\_PEV\\_CB\\_Analysis\\_FINAL.pdf](http://mjbradley.com/sites/default/files/PA_PEV_CB_Analysis_FINAL.pdf) .

**We urge DEEP to reconsider the need for an EV Roadmap.** Many components of the proposed EV Roadmap can and should be implemented immediately and do not require a separate and lengthy review process.

**We urge DEEP to include final and specific recommendations on long term funding/institutionalization of CHEAPR in the final CES.** Consumer incentives, such as tax credits and rebates, are essential to encourage the adoption of EVs because the higher sales price is often a barrier to purchase. Connecticut currently offers one of the best rebates and other incentives for the purchase of EVs but no long-term stable funding for this CHEAPR program has been established. We believe that the CES should recommend

1. that Connecticut institutionalize its rebate program (CHEAPR) and expand its funding,
2. that Connecticut initiate a program geared toward low-income residents offering larger rebates and rebates for used cars, and
3. that Connecticut explore and support new funding sources for CHEAPR, such as limiting and pricing carbon pollution from transportation fuels.

**We urge DEEP to include specific recommendations to increase access to charging infrastructure in the final CES.** Another barrier to EV adoption is limited access to charging infrastructure, leading to “range anxiety.” CES recommendations should include increasing EV charging infrastructure, especially expanding access to fast charging stations along highways and expanding charging infrastructure in multi-family and commercial buildings. EV-ready building codes should be modernized and enforced. The CES should also recommend that the full 15% of VW settlement funds allowed for light-duty charging infrastructure (8.4 million) be used for that purpose, and that the other 85% be used towards electrification of other eligible transportation categories.

**We urge DEEP to direct PURA to take reasonable steps to advance installation of charging infrastructure and ensure increased demand is cost-effectively integrated into the electric grid.** Utilities in Massachusetts and New York have submitted proposals to accelerate EV charging infrastructure. The final CES should direct PURA to open a docket to determine a role for the state’s utilities in supporting EV charging infrastructure, establish a process to submit proposals from electric companies to accelerate EV charging infrastructure in their service territories, and implement strategies such as improved rate design to most cost-effectively manage increased demand for electricity from EV charging.

**We urge DEEP to recommend a cap and invest program pricing carbon from motor fuels to fund clean transportation efforts.** The successful and popular Regional Greenhouse Gas Initiative (RGGI) established a market for carbon pollution from power plants in 9 states, including Connecticut. Under RGGI, the region has seen a 40% decline in GHG from power plants and raised billions in revenue for investment in clean energy<sup>4</sup>. We urge DEEP to build on the success of RGGI and apply lessons learned from the program to support a regional market-based climate policy for reducing pollution from transportation fuels. This program could raise revenue for clean transportation infrastructure, with a focus on communities most impacted by climate-disrupting pollution, and would offset declining gas tax revenue due to improved vehicle fuel economy.

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<sup>4</sup> See Analysis Group, The Economic Impacts of the Regional Greenhouse Gas Initiative on Nine Northeast and Mid-Atlantic States: Review of RGGI’s Second-year Compliance Period (2012-2014) (July 14, 2015).

We thank DEEP for efforts to map out a Comprehensive Energy Strategy to reach Connecticut's climate goals, and urge you to consider these recommendations for the final CES.

Sincerely,

Tim Ackert  
State Representative, District 8

Pat Boyd  
State Representative, District 50



Beth Bye  
State Senator, District S05



Michael C. D'Agostino  
State Representative, District 91



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(See attached letter)



Geraldo Reyes  
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CC: Tracy Babbidge, Bureau Chief, Energy and Technology Policy, DEEP  
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