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Matthew Lesser (State Rep)	12/21/2012	Renewables, NG, Virtual net metering,	General support. Support for NG expansion. CT could prohibit importation of toxic fracking waste into state like NJ. Also adopt a moratorium on fracking until DEEP/DPH can consider impacts on public health. New incentives for construction of net zero homes	
CT Department of Agriculture	12/14/2012	EE, financing, net metering, anaerobic digester & agri-waste	1) Financial, need to expand funding options for on-farm energy projects and provide a net metering policy friendly to agricultural producers.2) Anaerobic digesters are underutilized and challenged by net metering and REC policies in CT. 3) Need to develop regulatory and policy framework around wider use of feedstock - animal manure, agri-forest residues and urban wood waste as fuels in energy and CHP projects.	p. 2-3
City of New Haven/RB	11/19/2012	Conservation, building labeling, financing, water EE	Generally supportive of conservation, building labeling and C-Pace. Need to change statutes regarding property tax exemptions for all Class I sources for commercial and industrial uses. Urges creation of stormwater utilities to help customers with water runoff and to create a dedicated revenue stream to accelerate stormwater separation cycles.	pp. 1-2
CT Conference of Municipalities	12/14/2012	EE, Financing, Elec,	Expansion of the C-PACE program to other areas, such as low-income areas, should be examined and considered. Local officials will be a key component in the effort to encourage participation. For example, while the enactment of property tax exemptions for clean energy projects encourages participation, local officials should be afforded the opportunity to adopt it as a local option.	p.1
Clean Energy Finance And Investment Authority (CEFIA)	12/17/2012	All sectors	General support + specific support for their EE programs. Specific recommendation: DEEP, CEFIA and key stakeholders should explore options with municipalities for property tax relief for clean energy projects administered or supported by the state. CEFIA supports a legislative proposal to enable municipalities to exempt commercial clean energy projects from property tax assessments.	
Office of Consumer Counsel	12/21/2012	Cost-effective EE	There is no statutory requirement/mandate for "all cost-effective EE" but DEEP is free to recommend it. Any increase in ratepayer funding should be subject to rigorous analysis. OCC does not understand why DEEP requests that ratepayer funding increase "so significantly and then remain flat for the ten-year planning horizon." IRP and CES are inconsistent - project decrease in ratepayer funding within text but no decrease reflected within the numbers.	
Office of Consumer Counsel	12/21/2012	Ramp Up/Down of Ratepayer Funding for EE	During the tech meetings (T. p 713) a "ramp up then ramp down" was advocated - OCC would like a clear timeframe for this. Ramp up should not be advocated without timeline for ramp down. If C&LM cost goes up to $0.37/kWh, bills are likely to increase - CES does not address this.	

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Office of Consumer Counsel	12/21/2012	Cost-effective EE	Cost-benefit analysis for EE not in same manner for review of C&LM programs or IRP - OCC remains confused about approach. Specific comments about Figure 3 on Page 12 of CES on OCC's page 10. Concerned about lack of planning about diminishing C&LM program savings as a result of changing federal lighting standards. DEEP has not identified programmatic changes needed to capture potential outside of lighting. Any measurement of improved operation & maintenance/behavioral changes is speculative.	
Office of Consumer Counsel	12/21/2012	On-bill Financing	OCC disagrees that "on-bill" financed customers should be allowed to be shut off. No data provided to demonstrate any significant issues with loan repayment with current on-bill financing.	
Office of Consumer Counsel	12/21/2012	Oil Funding	OCC agrees that oil funding is needed to achieve EE goals for oil customers. If no oil funding solution is achievable, OCC suggests that oil heat customers be allowed to participate for non-heating fuel related measures only (i.e. lighting & appliances).	
Office of Consumer Counsel	12/21/2012	Decoupling	OCC concerned about further decoupling - thinks companies have sufficient existing incentives for EE. "All but C&LP are already being fully compensated for lost revenues from C&LM" - and C&LP can't request a CAM until 2014.	
Energy Efficiency Board	1/17/2013	CES Strategic Goals	EEB supports the strategic goals of CES and the key role assigned to State's EE programs to help achieve these goals. Given the multi-decade horizon for CES, final CES should broaden its perspective on CT's strategic energy goals.	p. 4
Energy Efficiency Board	1/17/2013	EE/Sustainability	EEB's program vision for Connecticut Energy Efficiency Fund (CEEF) for reaching all cost-effective energy efficiency and sustainability includes: (1) efficiency programs that achieve deep and meaningful savings goals (30-50%+) for all customers; (2) high performance buildings, systems and industrial processes that achieve deep energy savings; (3) comprehensive residential and business energy solutions that integrate program service delivery; (4) innovative financing strategies; (5) initiatives to make sustainable energy management an integral part of household and business practices; and (6) market transformation through development of natural markets for energy efficiency and sustainability products and services.	pp. 4-5
Energy Efficiency Board	1/17/2013	EE	CEEF programs are the only State authorized programs that expressly target deep energy efficiency goals and offer programs to achieve these savings through market activities and market transformation. As a result, CEEF programs are the primary engine for achieving CT's all cost-effective energy efficiency goal under legislative action and the IRP, and, therefore, are the primary engine for achieving the CES deeper efficiency goals as well.	p. 5

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Energy Efficiency Board	1/17/2013	EE Financing	Financing is an important strategy for promoting and achieving energy efficiency while moderating ratepayer costs. Financing products need to be well-designed and meet key criteria in order to be effective at increasing customer participation and reducing program and ratepayer costs.	p. 5
Energy Efficiency Board	1/17/2013	EE Financing	To guide the CES and its implementation, relative to the development of financing products, EEB recommends that: (1) the financing process must be convenient from a customer perspective and streamlined from a programmatic perspective; (2) the product must be attractive and economical from a customer perspective; (3) the product should be economical from a program perspective; (4) the product (or mix of products) must meet the needs of targeted market segments.	pp. 5-6
Energy Efficiency Board	1/17/2013	Market Barriers	There are a number of well-documented market barriers and failures, in addition to capital constraints, that limit CT residents, businesses and manufacturers from realizing full potential benefits of EE. CEEF programs are best positioned to directly address these market barriers. CEEF programs have been designed and upgraded to better address market barriers in conjunction with financing strategies. EEB suggests that complementary program strategies are also critical to ensure capturing all cost-effective EE.	pp. 6-7
Energy Efficiency Board	1/17/2013	Efficiency Codes & Standards	CES should establish that primary strategic goal of high efficiency codes/standards is to ensure that the resulting buildings and equipment are actually performing at high efficiency levels on a sustainable basis. The CEEF programs have a critical role in realizing those ends.	p. 7
Energy Efficiency Board	1/17/2013	Zero Net Energy Buildings	CES does not discuss zero net energy buildings. CES should articulate a Zero Net Energy goal and strategy for new commercial and residential buildings, given the CES's long-term planning horizon.	p. 7
Energy Efficiency Board	1/17/2013	Alternative Conversion Options	CES should provide a broader set of conversion options. Analysis performed EEB's consultants shows that there are other heating system and fuel choices that afford similar (and for some "off main" scenarios, even greater) savings to consumers. These other options better address the large "Segment C" of homes and businesses identified in CES that will not have access to natural gas even after main extensions.	pp. 9-10

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Energy Efficiency Board	1/17/2013	Conversion Opportunities	CES should better leverage fuel conversion events to promote EE improvements in homes. Consumers making a fuel and/or heating system conversion choice represent a unique opportunity to bundle efficiency improvements. CES should put forward a mix of both incentives and requirements to ensure that efficiency opportunities are realized (to the extent practical and appropriate) at the time of a fuel or heating system conversion.	p. 10
Energy Efficiency Board	1/17/2013	Conversion Opportunities	Participation in HES and the installation of ENERGY STAR heating/hot water equipment should be required for any fuel or heating/hot water system conversion supported with state or ratepayer funds.	pp. 10-11
Energy Efficiency Board	1/17/2013	Conversion Opportunities	CES should more fully acknowledge and address options for domestic hot water fuel and equipment conversions and efficiency opportunities.	p. 11
Energy Efficiency Board	1/17/2013	Retrofit Activities	The CES's discuss of current retrofit activities in CT is not entirely reflective of current and planned program efforts. Some of recommendations should be revised to better reflect this information. Alternatively, discussion of existing home retrofit activities could "pull back" somewhat from the more detailed tactical recommendations and provide broader strategic direction.	p. 11
Energy Efficiency Board	1/17/2013	HES Program	Draft CES did not adequately acknowledge recent improvements in the HES program and the further enhancements planned for 2013.	p. 11
Energy Efficiency Board	1/17/2013	Building Labeling	A Building Labeling System should be developed and implemented to better utilize market forces to promote EE. Inclusion of home ratings in Multiple Listing Service (MLS) listings will increase the recognition and importance that both current and future homeowners place on efficiency.	pp. 12-13
Energy Efficiency Board	1/17/2013	Commercial Building EE	Commercial building efficiency deserves further treatment in CES that includes a more strategic, longer-term vision for non-residential buildings and facilities.	p. 14
Energy Efficiency Board	1/17/2013	CEEF Programs	The EEB has worked with the Companies and other stakeholders over past several years to restructure the C&I programs with new strategies and best practices in support of State Legislative and Administrative goals for EE and economic development in CT; Therefore, EEB consultants suggest that the CEEF programs are consistent with and supportive of the CES while also pushing beyond CES recommendations to higher performance levels toward State strategic goals.	p. 14
Energy Efficiency Board	1/17/2013	C&I EE	CES provides discussion concerning deep efficiency for residential buildings but provides limited references to C&I buildings and facilities. CES should make explicit reference to a deep efficiency and reference advanced design guides for renovations and building retrofits and part of the path toward net zero energy buildings.	p. 15

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Energy Efficiency Board	1/17/2013	Strategic Energy Management practices	CES should set as a strategic goal the adoption of Strategic Energy Management practices by all business, agencies and non-profits.	p. 15
Energy Efficiency Board	1/17/2013	Regional/National Strategic Alliances/Initiatives	As a long-term strategic document, the CES should make reference to regional and national strategic alliances/initiatives that are targeting deep EE and sustainability in buildings.	p. 16
Energy Efficiency Board	1/17/2013	Business Sustainability	CES's strategic goals for building efficiency should make reference to business sustainability.	p. 17
Public Utilities Regulatory Authority (PURA)	1/24/2013	EE Expansion Costs	Relative to the substantial increases in EE spending contemplated by draft CES, PURA recognizes that recent budgetary constraints make less feasible the use of governmental funding. PURA assumes that the more expensive options that would either involve taxpayer funds or result in unacceptably high rates will not proceed.	p. 2
AARP	12/14/2012	Rate impacts, EE financing, decoupling, TOU, NG	Generally recommends 1) a specific set of proposed steps for implementation of each policy proposal; 2) an economic analysis to evaluate the cost to ratepayers of each policy proposal, and of all the proposals in total; 3) proposed metrics to measure, quantitatively, progress towards achieving each key policy proposal relative to what otherwise would occur under a continuation of current policies.	p. 3
Carpenters Labor Management Program/Jim Lohr	12/14/2012	Jobs	General support - increase jobs for construction industry. Concerned that jobs go to Connecticut residents.	

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Clean Water Action/Roger Smith	12/21/2012	EE, funding, HES, Renewables, NG	General support for EE. Need contribution from heating oil customers to EEF or alternatively contributions from oil/propane customers on their electric bills. Shift HES contractor incentives, provide small business support and overhaul marketing for deeper savings. Marketing should shift to community outreach. Require CEEF-approved contractors to deliver a percentage of comprehensive jobs (including HVAC or insulation improvements). Revise CCAP to recommend strategies and inform CES.	
CT Coalition for Environmental Justice/Nortbert Kovacs	12/18/2012	EE incentives	Increase EE incentives to reward businesses, manufacturers, homeowners to reduce energy use or increase EE.	
Connecticut Fund for the Environment	12/20/2012	Disclosures at time of sale or rental, benchmarking, GHG/GWSA, oil heating surcharge, building energy labeling, decoupling	General support for EE. Final CES should include proposals to create partnerships to motivate building owners to take action and require disclosure of energy use at the time of sale or rental and benchmarking of EE in key categories of buildings. CES needs to take GHG impacts and GWSA targets into account in all sectors - especially for long-range planning. Support an oil heating surcharge for EE programs. It may be time to move beyond the total resource cost test. NG expansion may undercut EE investment. Recommendations 12 & 13 do not include a measure to address owner-operated commercial buildings. Need mandatory commercial benchmarking and mandatory disclosure to potential tenants, buyers or lessees AND disclosure in an online public database. Final CES should recommend beyond a voluntary residential labeling program - unlikely to be successful without a firm requirement. Need more work in multifamily housing and mid-sized commercial buildings to overcome barriers. New residential energy efficiency financing programs, both buy-downs to a 0% interest rate and on-bill financing, would help encourage homeowners to invest in energy efficiency measures. NSTAR merger prevents CL&P from asking for revenue decoupling until 2015. (continued)	

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Connecticut Fund for the Environment (continue)	12/20/2012	Technical Corrections	CFE provided two technical corrections: Figures 5 and 6, on pages 15 and 16 respectively, in the Energy Efficiency Strategy chapter both state that their sources are "U.S. EIA, State Energy Data System; and U.S. EIA, Annual Energy Outlook 2012." As the appendix makes clear, projections from Annual Energy Outlook 2012 only extend to 2035. The projections for 2050 are based on extrapolations from the Annual Energy Outlook 2012 done by DEEP and its consultants. In the final CES, the equivalent of these figures should be labeled to indicate that they are additionally based on such a projection. More generally, the final CES should label figures clearly to indicate what data comes from which sources and when DEEP or its consultants performed additional calculations from that data. Lastly, Appendix A, when describing several different projections, states that "2036–2050 is linearly extrapolated from the 2012–2035 sector compound annual growth rates." This phrase should be clarified. Linear extrapolation and extrapolation using compound annual growth rates are distinct methods and can lead to significantly different results.	
CT Industrial Energy Consumers/JK	12/14/2012	CL&M self-directed programs, decoupling, NG	Absent approval of a self-directed pilot program, the number of viable large scale C&I projects will continue to decline despite the DEEP's best intentions. Accordingly, CIEC respectfully requests that the DEEP affirmatively include the development and implementation of a self-directed program as a policy goal in the Draft CES.	p. 2
ConnPIRG	12/14/2012	EE, Biomass, Resiliency, NG, Transp.	Recommends an overall review of existing programs, considering everything from program administration to consumer incentives to community outreach partnerships by comparing our programs to best practices in other states.	p.1
Connecticut State Council of Machinists/John Harrity	3 (12/11/12)	Canadian hydro, CT-manufactured renewables, financing, natural gas expansion, EE & its financing	Increase HES participation among residents through long-term financing. Develop a conservation "bank" initially funded through the utilities that establishes a self-replenishing fund available to homeowners with long-term repayments - total repayment in the event of a property sale. More favorable funding = more participants = more jobs.	

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CT Working Families/LF	12/14/2012	EE, Green jobs, grass root efforts for EE, self-funding EE programs	We encourage further creation of green training programs that expand supports to 1) the new generation of the workforce through Connecticut schools and colleges, 2) the retraining of unemployed or to-be unemployed, yet certified tradespeople, and qualified workers in areas with high unemployment. We support attempts to create relationships between community-based organizations, faith groups, non-profits, business and homeowners as a way to encourage EE & jobs. Should cont. move away from rate-payer surcharges, greater taxes on workers and small businesses, or unreliable pots of money from the Federal government or other entities. This will require seed funding, but the goal should be self-sufficiency	pp. 1-2
ConnPIRG, Clean Water Action, CT Citizens Action Group, Environment CT, Sierra Club CT Chapter, National Sierra Club, RENEW, Working Families Organization, Conservation Law Foundation, Inter-Religious Eco-Justice Network, 350 CT	12/21/2012	EE, GHG, renewables, transportation, microgrids	General support for EE. Final CES must address GHG commitments in GWSA. RPS should be maintained as is and should not expand definition of Class I to waste-to-energy and Canadian hydro. State can make use of long-term REC and power purchase agreements to build renewable projects in CT and New England at stable prices.	

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Conservation Law Foundation (CLF)/NJP	12/21/2012		Supports all cost-effective mandate - DPUC interpreted said mandate overly narrowly in past. General support for EE. CES acknowledges KEMA EE potential study but does not advance key findings of study like high-efficiency furnaces and boilers. High efficiency appliances could be a requirement of NG conversion opportunities. State should adopt an EE standard for NG and adopt decoupling mandate for natural gas utilities. Need to develop incentives for efficient oil heat boilers and furnaces. Final CES should meaningfully advance 2005 CCAP and GWSA plan/mandates. CES overlooks smart metering and other intelligent efficiency measures.	
The Desai Grp.	12/17/2012	DR & peak supply management	We would need to consolidate the currently disjointed Energy Efficiency and DR audits into a singular system evaluation and provisioning process and consider offering incentives and financing dedicated to these efficacious, integrated EE-Auto DR solutions within our conservation programs.	p. 2
ECCoLoV/EarthCharterConnecticut/ MH	12/15/2012	EE, Renewables, NG	Support the plan's proposals on energy efficiency but concerned that it doesn't emphasize energy-use reductions sufficiently while promoting an over-reliance on natural gas and including proposals that weaken the state's renewable energy requirements. Opposes the plan's suggestion to weaken the RPS by allowing existing trash incinerators and environmentally-damaging hydropower projects in Canada to qualify. This will prevent wind and solar power projects from getting built locally, depriving Connecticut of the reliability and environmental benefits.	p. 1
Enviro Energy Connections/Henry Link, PE	12/10/2012	oil customer EE funding, energy performance ratings for buildings, HES	Need oil customer energy efficiency surcharge. DEEP should establish energy performance ratings for buildings. Need to increase funding and publicity for HES for all customers.	

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Environment Connecticut	12/21/2012	Improve EE funding and Admin.	Need oil funding, create 3rd party administrator for EE programs and need clear goals and benchmarks .	p. 1-2
Environment Northeast	12/21/2012		Agrees with the ramp up of CT's investment in EE for all fuels including heating oil. Must ramp up and remain stable to maximize the benefits. Funding has been inconsistent due to funds raids to cover budget shortfalls, inefficient agency review process that delay annual funding decisions well into the calendar year at issue and inflexible annual budgeting processes that lessen the ability of EE programs to meet cyclical customer demand in particular program areas. Agree thus, to go to 3 yr. planning cycle. Final CES should make note of the importance of this step.	
Environment Northeast	12/21/2012		The additional innovation of the 2013 CAM on electricity sales is crucial. Final CES should acknowledge the compelling need for a CAM, echo the recommendation for increased ratepayer funding found in the IRP, and note the use of similar rate mechanisms in other states like MA.	
Environment Northeast	12/21/2012		ENE recommends DEEP propose new legislation in 2013 to address critical heating oil gap in EE programs. Legislation should include: A minimum of $7.5 million of funding for oil EE via an oil surcharge. It should begin at 1.5 cents per gallon and then ramp up over time to 3.5 cents, with an equivalent per BTU charge for propane.	
Environment Northeast	12/21/2012		Direct PURA to employ a cost-effectiveness test that includes all fuels to evaluate multi-fuel programs. An all-fuels program administrator cost test (PACT) would be well suited to this.	
Environment Northeast	12/21/2012		Modify 11-80 to allow EE funds to be used for oil EE contingent upon concurrent passage of a heating oil assessment and limiting annual electric efficiency fund contributions to oil efficiency to no greater than proceeds form the heating oil assessment. ENE modeled these benefits in its report, "Energy Efficiency: Engine of Economic Growth." Study found that over 15 years, CT would see an increase in economic activity of $40 billion (in 2008 dollars) as consumers spend energy bill savings in the wider economy. Also, would result in 125,900 GWh and avoided GHG emissions equivalent to 9.7% of 2005 total emissions. CT's EE programs have been the single most effective climate policy enacted by the state over the last decade.	

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Environment Northeast	12/21/2012		Recommendations Regarding the Role of Leverage Private Capital in EE programs. CES proposes a shift from ratepayer funds to leveraged private capital for EE programs. ENE has serious concerns with this. The current EE rate charges are tiny. Ratepayer funding for EE provides positive net returns in the form of real energy savings, lower bills, more household spending power and lower overall energy costs. ENE believes that additional financing options that supplement and tie in with successful rebate and incentive programs could allow more efficiency to be captured and maybe with lower program costs. If those cost improvements do not materialize, all cost effective EE must still be implemented and funded because it will lower the total energy costs for businesses and consumers.	
Environment Northeast	1(12/21/12)		CES should be modified to address ten significant market failures that EE programs seek to correct. They are: split incentives, lack of individual cost information, uncertainty of savings, inadequate information regarding efficient option, bounded rationality, elevated hurdle rates, liquidity constraints, transaction costs, availability issues and low priority of energy issues. Incentives and rebates are necessary to overcome these market barriers. High-quality financing options can address some market failures but many others barriers still exist and must be addressed. Private financing should only be a supplement to ratepayer funds. Three Major Tools are Needed: Technical assistance and energy audits, rebates and incentives and financing all in concert with CT efforts to improve energy codes and standards. A shift to finance only model will set back CT efforts and final CES should back away from this.	
Environment Northeast	12/21/2012		ENE likes CES Recommendations 4-10 and 12 but wants more info in final about how they will be implemented.	
Environment Northeast	12/21/2012		Recommendation 2 CES should acknowledge that CTs programs are among the best in the nation. Since weatherization of housing stock is in the interest of many CT goals, ENE suggests that the cost effectiveness tests be supplemented by an all fuels program administrator cost test and a participant cost test (PCT) should also be used for gauging whether a program is in a consumer's best interest. The PCT was used in other places in the CES but not EE. This approach should be adopted in the final CES.	

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Environment Northeast	12/21/2012		Recommendation No. 3: Scrutiny should be given to any new financial products to ensure that the welfare of CT's consumers is well-served esp. seniors and low income. CT should develop a low or no interest rate loan modeled after MA HEAT loan which is successful. ENE does NOT see the need for shut off authority as default rate for these loans is low.	
Environment Northeast	12/21/2012		Recommendation No. 11: ENE supports it but requests that DEEP adopt a written proposal made by ENE and coalition in 2012 to begin a special, focused enforcement effort to improve energy codes and compliance in CTs building stock by through a program administered by the utilities. 1)determine CT's energy code compliance rates 2)achieve full compliance with the 2009 model energy code by December 2017 and 3)develop and publish a strategic compliance plan 4)develop a funding mechanism for ongoing code work support and implementation and 5) adopt the 2012 IECC by July 1, 2013.	
Environment Northeast	12/21/2012		Recommendation No. 13: DEEP should offer legislation this session that 1) launch a mandatory statewide commercial benchmarking program and 2) launch a rating and labeling program for residential buildings at a later date giving stakeholders and DEEP time to learn form the commercial experience. Other jurisdictions have taken this approach and focused on commercial benchmarking first. ENE believes there would be less resistance form the real estate industry with this approach.	

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Environment Northeast	12/21/2012	Cost-benefit analysis for all fuels, GHG, C&LM multi-year plan, oil funding for C&LM programs, legislation	DEEP should perform a cost-benefit analysis for all fuel and non-fuel options in each sector - "for example, all passenger transport options potentially available in the transportation sector." Include environmental benefits (GHG emissions/avoided emissions) to seek apples-to-apples comparison across sectors. Statute governing CES calls for such an approach. Comparative cost-benefit necessary to satisfy governing law.	
Environment Northeast	12/21/2012		CES needs to better identify long-range planning issues that present significant negative risk to CT, such as: resilience of electric grid in extreme weather events, likelihood of regional or federal carbon pricing, operating license of Millstone, possibility of over-investing in NG. Statute calls for such long-range risk assessment.	
Environment Northeast	12/21/2012		CES needs to sync with long-range GWSA targets. DEEP should attempt to estimate potential GHG emissions reductions for each sector over time and compare to 2020 and 2050 targets - only done for Transportation. CES should also analyze life-cycle GHG emissions of fuels. CES should clarify which proposals are formal recommendations for policy action.	
Environment Northeast	12/21/2012		General support for EE. CES needs to address first-ever multi-year C&LM plan and how it helps achieve goals, as well as CAM.	
Environment Northeast	12/21/2012		Agree with oil funding needed for C&LM programs - ENE recommends DEEP propose legislation that: has a minimum of $7.5m of funding - 1.5 cent per gallon surcharge ramped up to 3.5 cents per gallon over time with equivalent per BTU charge for propane.	
Environment Northeast	12/21/2012		Direct PURA to employ cost-effectiveness test for all fuels - an all-fuels program administrator cost test (PACT).	
Environment Northeast	12/21/2012		Modify Sec. 132 of PA 11-80 to allow EE funds to be used for oil efficiency 1) contingent upon passage of heating oil assessment 2) limiting annual EE fund contributions to oil efficiency to no grater than proceeds from such assessment.	

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Environment Northeast	12/21/2012	ratepayer funding for C&LM programs, HES, use different cost tests, building codes, commercial and residential benchmarking/labeling	No timeline for shift from ratepayer funding to leveraged private capital for EE programs. ENE believes current funding is effective and not a burden on ratepayers. High-quality financing options can address some market failures - private financing can supplement ratepayer funds, not replace them. HES modifications should be based on comparative analysis of program savings and those in other states.	
Environment Northeast	12/21/2012		In addition to PACT, an participant cost test (PCT) should also be used to gauge programs - it was used in other sectors but not for efficiency. Reiterates previous recommendation from coalition members on building codes: - a special focused enforcement effort should: (1) determine Connecticut's energy code compliance rates; (2) achieve full compliance with the 2009 model energy code by December 2017; (3) develop and publish a strategic compliance plan; (4) develop a funding mechanism for ongoing code work support and implementation; and (5) adopt the 2012 IECC by July 1, 2013. DEEP should propose legislation that would launch a mandatory statewide commercial benchmarking program and launch mandatory rating and labeling program for residential buildings at a later date (learn from commercial program before implementing residential program). These efforts should occur in parallel to research and vetting of residential labeling system.	
Home Builders & Remodelers of CT Assoc.	12/14/2012	Buildings, Codes, EE marketing and NG	1) Adoption of the 2012 IECC and a six-year building code cycle to create reasonable, measured progress toward policy goals; 2) Suggestion by other stakeholders of adopting a "stretch code" or allowing municipal option adoption of building code provisions; 3) Energy audits, benchmarking and home labeling issues; 4) Appraisal industry issues relative to accurately appraising green buildings;5) General comments about natural gas and other energy sources; and 6) Transit oriented development.	p.3
Home Performance Alliance of CT	11/28/2012	HES program and marketing	Disagrees that HES program over-rewards vendors and need greater public awareness of programs and savings. Raised issues about the impact that cancellations have on the program. A significant statewide marketing campaign should be undertaken to brand Home Performance and the importance of the whole-building approach.	p.1

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Institute for Sustainable Energy	12/11/2012	Barriers to participation, improved building codes	Change terms of utilities' contracts to make them compatible with state contracts such that state universities can participate in efficiency programs. Allow UConn and Board of Regents to participate in LBE ESPC. Leverage EEF incentives and CPACE to target multifamily properties. Encourage above code standards. Amend law to allow higher than code efficiency for affordable housing using sustainable TOD neighborhoods. Promote PA11-80's tax credit for LEED buildings. Outreach to architects, builders, building assessors, public about building code. Increase promotion of CT Green LEAF Schools program.	p. 2 ,3
Interreligious Eco-Justice Network/TE	12/14/2012	EE, marketing, oil funding, GHG, biomass, NG, HQ	Recommends 1) increased training for workers and more effective marketing to promote the programs 2)using non-profits and word-of-mouth strategies, rather than ineffective media ads 3) very interested in participating in the SBEA program.	p. 1
Legal Assistance Resource Center of Connecticut, Inc./Raphael Podolsky	12/14/2012	On-bill financing, renters, on-bill shutoff	Strongly against shutoff as enforcement mechanism for on-bill financing. Termination is an extraordinarily powerful remedy - already enforceable through collections lawsuits and liens. Unclear how on-bill financing would apply to renters, as landlords own furnace - conflict with landlord-tenant laws. Does on-bill financing allow landlord to transfer cost of facility that provides heat to tenant? Other assumptions in support of utility shutoff are incorrect: that lenders will not engage in on-bill financing unless guaranteed right to terminate service, on-bill financing will routinely produce a net-cost reduction on the bill, most on-bill finance programs actually involve business customers - unclear how this will transfer to residential customers.	

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Stakeholders	**Date Filed**	**Main Topic**	**Specific Issue**	**Page Cite**
Legrand	12/14/2012	Financing, incentives, microgrids, building labeling and code	State Financing and Funding Programs - Ensure transparency in state-funded financing opportunities and grant programs; Inform all participants of their bid status in a timely manner; Publicize non-proprietary characteristics of winning bids; Communicate how the winning bids fulfill the operational and policy goals of the financing programs; Make the scorecard for project proposals and the scores of the winning proposals transparent. Expand microgrids to higher ed and public schools. State should host an annual High Performance Building Stakeholder conference to engage all building industry participants and state should conduct a pilot program to build or retrofit one or more state buildings to the standard of ASHRAE 189.1. • Encourage legislation to establish a 3 year code cycle and create consistency with Connecticut building and energy code adoption process. Expand the HES program to include low-cost energy saving devices, such as dimmers, switches, and occupancy sensors.	
Megacommunities/Joan Carty	11/5/2012		Non-Utility Model to deliver efficiency. Model the ramp-up of consumer demand, capital requirements and workforce capacity to reach the state's weatherization goals through an iterative and stakeholder-driven process.	
Megacommunities/Joan Carty	11/5/2012		Engage a stakeholder group to work with the EEB to evaluate the best ways to allocate customer acquisition costs between public dollars and private dollars. Implement a robust contractor- and consumer-friendly HPwES program that greatly increases the number of participating contractors, especially those who are already doing work across the state.	

Efficiency Sector Comments				
Stakeholders	**Date Filed**	**Main Topic**	**Specific Issue**	**Page Cite**
Megacommunities/Joan Carty	11/5/2012		Expand beyond the current HES vendors and tap into the broader marketplace of contractors. To drive consumer demand through HPwES, the customer and contractor cost disparities between HES and HPwES must be addressed, aligning the allocation of ratepayer incentive dollars with contractor and customer incentives to encourage deeper energy savings.	
Megacommunities/Joan Carty	11/5/2012		Restructure HES to align contractor and customer incentives to the state weatherization goal to go deeper with energy savings. Invest in marketing materials that are co-branded with EnergizeCT that contractors can tailor for their own use, and educate consumers about professional standards of the home performance industry. Invest in building contractor capacity for sales, marketing, back office administration, and expansion.	
Megacommunities/Joan Carty	11/5/2012		Partner with DECD's Small Business Express Program, Workforce Development Boards and other existing programs to provide training, assistance, loans, etc. to contractors.	
Megacommunities/Joan Carty	11/5/2012		Perform a customer segmentation study on the demographic/psychographic profile of who has done HES, who got recommendations, who moved forward, etc. to better understand HES vs. HPwES customer segments. Engage a specialty marketing firm to develop consumer-friendly marketing materials, including "packages" of improvements. Ensure the latest marketing best practices are used including multi-touch/multi-platform/multi-channel approaches, use of trusted sources, testimonials, etc.	

Efficiency Sector Comments				
Stakeholders	**Date Filed**	**Main Topic**	**Specific Issue**	**Page Cite**
Megacommunities/Joan Carty (continued)	11/5/2012		Implement a stakeholder process to define a customer engagement platform and its requirements and potential implementation paths. Include energy efficiency program administrators, DEEP, contractors, and other 3rd parties. Outsource community-based outreach to nonprofits and community partners better positioned to serve target market segments. Coordinate program intake and delivery with social services and health and safety programs.	
Megacommunities/Joan Carty (continued)	11/5/2012		Empower building owners to market their energy efficiency via a home energy rating labeling system. Provide significantly enhanced support to contractors so that they can better promote financing options to consumers, especially since financing is most successful when integrated with program intake and delivery. Encourage participation in the financing program from a greatly expanded set of contractors.	
Megacommunities/Joan Carty (continued)	11/5/2012		Implement a pilot program with local credit unions, community development financial institutions and community banks and provide limited credit enhancement.	
Megacommunities/Joan Carty (continued)	11/5/2012		Collect and analyze performance data on existing and future loan programs, including underwriting characteristics, loan performance data, and actual energy savings performance data.	
Megacommunities/Joan Carty (continued)	11/5/2012		Pursue a sustainable interest rate (i.e. between 4 to 6 percent) that is competitive with the market and that minimizes use of ratepayer and/or public sector capital, reserving the use of lower interest rates for low-income households or as special offers to catalyze a market.	
Megacommunities/Joan Carty (continued)	11/5/2012		Consider implementing an on-bill repayment program or improve existing on-bill offerings for specific customer segments to attract private capital investment at reasonable interest rates to customers.	

Efficiency Sector Comments				
Stakeholders	**Date Filed**	**Main Topic**	**Specific Issue**	**Page Cite**
Megacommunities/Joan Carty (continued)	11/5/2012		Shut-off authority and staying with the meter provisions should be explored for various customer segments, with consumer protection measures for low-income populations.	
Megacommunities/Joan Carty (continued)	11/5/2012		Such provisions should be incorporated if it can be shown that it is necessary to secure low-cost capital and that the benefits outweigh the potential risks to low-income customers.	
New England Clean Energy Council	12/14/2012	Energy Efficiency and Incentives; Smart Grid, dynamic pricing; RPS; RGG); NG; Transp.	1) CEFIA should explore other models of encouraging third party investment energy efficiency and demand response 2) DEEP should work with the Assembly to consider a heating oil efficiency funding mechanism, such as SBC and/or expanded use of electric SBC funds to serve the thermal efficiency needs of heating oil and/or propane heating customers. 3) analyze and compare the costs (and benefits) of deploying advanced metering that can enable dynamic price signals. 4)Virtual Net Metering- NECEC therefore recommends that expansion of virtual net metering should be based on a percentage of load rather than a dollar value, should be available to private as well as public customers, should provide flexibility with respect to ownership, and should consistently provide for netting at the retail price.5) Class I Renewable Energy Sources should be expanded to include biofuels and can include bio-diesel for transportation, biofuel blended heating oil, and wood pellet heating boilers. Clean energy applications such as biomass-based heating and cooling systems, using wood pellets, bio-diesel (blended with heating oil), or biogas from anaerobic digestion or landfill gas capture projects, as well as solar water heating and geothermal heating and cooling. 6) HQ- Don't consider adding to Cl. I, a Clean Energy Standard (CES) or a separate RPS class may offer an appropriate way to incorporate large hydro into RPS. 7) Renewables- increase them and the decrease costs by expanding long-term contracts to the energy produced in addition to the RECs.8) NG-The benefits and costs of building out mains (Segment B) should be evaluated carefully to ensure that investments are made strategically and benefits are maximized. Again, energy efficiency should be built in as a prerequisite for the investment.	pp. 2. 4. 5. 8

Efficiency Sector Comments				
Stakeholders	**Date Filed**	**Main Topic**	**Specific Issue**	**Page Cite**
Northeast Energy Efficiency Partners	12/14/2012	Building code, labeling, appliance standards	1) NEEP has offered its support to help the state devise a better system for assessing building energy code training and compliance but EDCs haven't responded on whether have funding to do assessment plan. 2) Strongly suggest that DEEP's recommendations on building energy rating/labeling and disclosure go much further than was outlined in the CES.3)DEEP continue to offer and promote the Northeast Collaborative for High Performance Schools (NE-CHPS) protocol for new school construction and require that all public building facilities managers be certified in resource-efficient operations and maintenance practices. 4) DEEP use its authority and not only investigate opportunities for setting new state-based appliance standards, but also weigh in more forcefully with the U.S. DOE to ensure strong new federal standards.	
North Haven Clean Energy Task Force	12/8/2012	Town Task Forces	CES should include language and provisions that involve and provide support for the many (approx. 90?) town and city clean energy task forces and commissions. The task forces/commissions can be an important link in promoting a comprehensive energy strategy. Also, wants funding for task forces to provide small grants to community groups to promote conservation and clean energy sources.	p. 1
Neighbor to Neighbor Energy Challenge (N2N)/Kerry O'Neill, Joana Abreu, Kat Donnelly	12/21/2012	Change cost test used, use community marketing	State should begin using the Modified Total Resource Cost or Societal Cost test instead of Program Administrator Cost Test/Total Resource Cost test. State should mimic N2N model of community-based marketing and a portfolio approach to EE.	
Northeast Energy Efficiency Council - CT Chapter	12/14/2012	HES, OEEB, SBEA, Financing	More detail on innovative private financing mechanisms. Additional licensing of HES contractors is unnecessary. "Feet on the street" to reach small businesses - NEEC-CT can help get word out about SBEA.	
Northeast Utilities/CL&P/Yankee Gas	12/21/2012	EE, RPS	To meet EE goals need regulatory changes: 1) timely program cost recovery, recovery of lost revenues, performance incentives to incent utilities to meet or exceed CES including direct financial incentives. DEEP should endorse its approval of a CAM as part of the final CES. Support CES recommendation to transition to a market-based funding approach, but any reduction in EE rebates needs to be careful. Financing should come in various forms and consider all-in costs of financing.	
Marianne Horn/Board member, PACE (Peoples Action for Clean Energy)	12/9/2012	EE, NG, Renewables	Supports more renewables not NG conversions. Argues that EE programs shouldn't be administered by utilities.	

Efficiency Sector Comments				
Stakeholders	**Date Filed**	**Main Topic**	**Specific Issue**	**Page Cite**
PMC Property Group, Inc.	12/21/2012	private funding, EE deeper measures, submetering	Private lenders including PMC stand ready to invest in capital costs for EE technologies in residential buildings. Docket #12-08-16 Mitsubishi thermal refrigerant allocation system under investigation for violating submetering - EE-conscious folks will end up subsidizing people who do not conserve. Deeper EE gains can only be realized with submetering changes.	
Roundtable on Climate and Energy/Sent by Martha Kelly	12/14/2012	EE, NG, Renewables	General support for EE and raising RPS target. Oppose Canadian hydro and waste-to-energy as Class I. Oppose NG expansion, question NG expansion jobs numbers. Urge next draft to spell out "additional measures" needed to hit GWSA targets	
Martha Kelly/Sent with Roundtable on Climate and Energy	12/14/2012	EE, NG	Opposes NG expansion - wants same funds devoted to renewables and specific projects like the Hartford Landfill solar installation. No consideration of environmental/public health concerns of fracking as well as not enough consideration of climate impact. Trash-to-energy should not be considered a Class I source. Strategy missed principles of green chemistry.	
Sierra Club/Joshua Berman, Mardin Mador, John Blake	12/21/2012	building code, benchmarking	Support for all cost-effective EE, deeper measures under HES, on-bill financing. To the extent that approval from PURA is required to enable on-bill financing, the Sierra Club strongly encourages PURA to approve the measures necessary to enable this beneficial financing tool. Specific recommendations: (1) Connecticut should adopt the 2012 IECC (the most current code) in 2013; (2) The State should expeditiously appoint a Building Inspector and ensure that all state officials charged with implementation and enforcement of building codes are in place; (3) The State should commission a study of the compliance rate for Connecticut's building stock and, based on the results of this study, take steps to ensure widespread compliance; (4) The State should vigorously enforce building codes and require that public buildings, including schools, be brought into compliance as quickly as possible; and (5) The State promote education and training programs so that owners, building officials, code officers and others understand the importance to our energy goals of code compliance.	

Efficiency Sector Comments				
Stakeholders	**Date Filed**	**Main Topic**	**Specific Issue**	**Page Cite**
Toxic Actions Center/ JL	12/14/2012		General support	
UIL Holdings (CNG, SCG and UI Company)	12/21/2012	HES, peak demand, decoupling	CES unfairly characterizes HES as merely lighting and weather stripping and calls for program metrics and a vendor scorecard that already exist. On-bill financing is already in place - ignored by CES. A singular focus on deeper HES measures will diminish rest of program as most deeper measures are not cost-effective and "significant cost-effective savings now completed through core HES services would no longer be completed." Do not "revamp" HES but ask EEB to evolve HES to include deeper savings. Do not make changes that would eliminate current cost-effective savings measures. Agree with need for building labeling/increased marketing but disagree with car salesman characterization. Too much focus is given to peak demand reduction. UIL is optimistic CNG and SCG "use per customer" decoupling proposed in last respective rate cases will be revisited by PURA with renewed interest. Careful examination of sources of funding for health and safety issues during weatherization is warranted.	
Wilton Energy Commission/Bruce Hampson	12/12/2012	HES	Increase HES funding. Have a predictable HES subsidy that is equal among oil and natural gas customers. Increase HES visibility.	
??	12/14/2012	Ground Source Heat Pumps	Numbers used for Ground Source Heat Pumps is incorrect. The CES references an EIA study that shows total installed costs for ENERGY STAR GSHPs TO BE $8,000-$9,000 for homes. In SWA's experience in Connecticut, a more realistic value is closer to $30,000 for homes of average size (approx. 2,000 sq. ft.). Also, disagrees with GSHPs as renewable energy systems. From a basic engineering and thermodynamic perspective, this proposal has no merit. One technology that is largely dismissed in the CES document is air source heat pumps (ASHPs).	
Comments of 12 Connecticut Residents Concerning EE and NG	12/21/2012	EE funding, install measures and apply other EE standards at the time of NG conversion	Fully fund CEEF in 2013 and ensure all residents can participate. DEEP should require homes seeking financing for gas conversion to install high-EE equipment and meet weatherization standard. Insulation and other improvements should be financed during the same time as natural gas conversion.	

Efficiency Sector Comments				
Stakeholders	**Date Filed**	**Main Topic**	**Specific Issue**	**Page Cite**
Lynne Bennett	12/14/2012	Low-Income Residential	Advocates more residential applications in low-income neighborhoods from the CT Innovation Fund. She believes most installations have been given to corporations and suburban homes. This is unfair to low-income ratepayers.	p. 1
Lynne Bennett	12/14/2012	Low-Income Residential	Low-income housing is in many cases poorly built and inefficient. She believes financial assistance should be linked to their utility consumption so they can exercise some personal conservation choices.	p. 1
Anne Eglinton	12/14/2012	EE and Renewables	Supports broader, deeper EE, reform of HES and other EE programs. Also opposes NG expansion, any reliance on HQ or dirty biomass and lack of plan for in-state renewables.	
Daniel Fischer	12/14/2012	EE, NG, Trash-to-energy	General support for EE. Against NG expansion. Against Canadian hydro. Replace Millstone Nuclear with renewables. Against "false solutions" of "carbon trading and clean coal." CES lacks climate targets and will not meet GWSA goals. Transition to more renewables across the board with an eventual target of 100%.	
Robert Frommer	12/1/2012	Plan does not meet its stated goals, a more appropriate analysis would use Net energy	Missing from consideration in the Draft are measures to minimize the demand for energy in solid waste, food, manufacturing, information, healthcare, education, home heating oil, energy storage, and nuclear power.	p. 2
Martha Kelly	12/14/2012	Renewables, NG	General support. Need greater interest/support for renewables and not NG expansion.	p. 1
Mitch Kennedy	12/21/2012	biogas, specific Industry comments	No mention of using local bio-gas/methane from landfills, sewage treatment plants or farms.	
Lisa Koehl	12/13/2012	EE and Transp.	Supports maximizing support for energy efficiency and renewables.	p. 1
BJ Lambert	12/13/2012		General support	

Efficiency Sector Comments				
Stakeholders	**Date Filed**	**Main Topic**	**Specific Issue**	**Page Cite**
Diane Lauricella	12/21/2012	Building codes, benchmarking, municipal regulations, NG	Minimum energy assessment benchmarks for every structure in every town. State and local governments must help create greater monetary incentives that are accompanied by strategic marketing and education that identify real savings. Current HES program is too slow and inconsistent. Need minimal standard benchmark for rental units. Local governments should include energy policy amendments in their local Master Plans of Conservation and Development. Mandate local energy task forces. Opposes heavy reliance on NG.	
Diane Lauricella	12/21/2012	Building codes, benchmarking, municipal regulations, NG	Minimum energy assessment benchmarks for every structure in every town. State and local governments must help create greater monetary incentives that are accompanied by strategic marketing and education that identify real savings. Current HES program is too slow and inconsistent. Need minimal standard benchmark for rental units. Local governments should include energy policy amendments in their local Master Plans of Conservation and Development. Mandate local energy task forces. Opposes heavy reliance on NG.	
John Liseo	11/26/2012	geothermal	Geothermal heat pumps are largely left out of the CES.	
Kevin Oshea	12/14/2012	EE, Transp., NG	(Wants to be hired as a consultant on Transp. Issues) NEED intelligent Signals that are sensitive to traffic flows and time of day!! Traffic circles vastly improve traffic flow and reduce pollution. Car Pooling and HOV lanes should be considered. Also re. NG- argues to consider LNG terminal on land, in a depressed city like Bridgeport or other area, might make sense.	
Lena Pavel	12/19/2012	Education, Building Code	Mass media should educate on solar and wind. All new construction and renovation should meet high EE standards. Against fracking.	
Kathy Peterson	12/13/2012	General	General support	
John Stewart	11/20/2012	HES	Increase HES funding. General support.	
Kim Stoner	12/12/2012	Marketing EE, financing and Transp.	More effective marketing of Home Energy Solutions Expand energy efficiency efforts to condominiums, multi-family housing, small businesses and residences using oil heat. Put economic development money toward investments in retro-fitting for energy efficiency.	
John Thatcher IV	11/14/2012	Building code, HES	Make LEED certified buildings standard for all new building construction. Advertise energy audits as a tax break to businesses and free to all home sales. Require automatic lighting.	
Joseph Wasserman	12/12/2012	Renewables, NG	Opposes NG expansion, wants more renewables and disagrees with the use of Trash incineration. It needs to be taken out of the plan totally.	

Industry Sector Comments				
Stakeholders	**Date Filed**	**Main Topic**	**Specific Issue**	**Page Cite**
Clean Energy Finance And Investment Authority (CEFIA)	12/17/2012	All sectors	General support + specific support for Clean Energy Business Solutions (their program) and Advanced Innovation Hub	
Energy Efficiency Board	1/17/2013	EE	EEB supports strategic goals of CES for manufacturing but suggest a broader strategic perspective for the role of CES and CEEF-funded EE programs.	p. 18
Energy Efficiency Board	1/17/2013	EE	EEB has worked with the Companies and other stakeholders over past several years to restructure the C&I programs with new strategies and best practices in support of State Legislative and Administrative goals for EE and economic development in CT.	p. 18
Energy Efficiency Board	1/17/2013	CEEF EE	Draft CES does not accurately represent the achievement of the CEEF C&I programs nor acknowledge the EEB's collaborative efforts toward continuous improvement for those programs.	p. 19
Energy Efficiency Board	1/17/2013	System Optimization and Strategic Energy Management	The most effective path for achieving the CES goals for manufacturing process is by building on the current CEEF program foundation through system optimization and strategic energy management for industry.	pp. 20-21
Energy Efficiency Board	1/17/2013	Water Conservation	While supporting the CES's priority for water conservation in the manufacturing sector, EEB suggests that this strategic goal should be expanded to encompass sustainability for manufacturing.	p. 21
Energy Efficiency Board	1/17/2013	Regional/National Strategic Alliances/Initiatives	As a long-term strategic document, the CES should make reference to regional and national strategic alliances/initiatives that are targeting deep energy efficiency and sustainability in manufacturing.	
Class III CHP Organization ("C3CO")/SB	12/21/2012	RPS, RECs	Supports C&LM funding remove C&LM projects from Class III. Supports promotion of CHP but notes a significant barrier is revenue uncertainty in the Class III program due to the oversupply of Class III credits and that, in addition to limiting the Class III market to CHP resources, as recommended by the draft Strategy, the 1 cent per kilowatt-hour price floor must be preserved.	pp. 3, 5, 7,8,

Industry Sector Comments				
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Clean Water Action/AH	12/14/2012	EE funding, PRIME, safety	General support. With respect to PRIME program believes should be expanded and also hopes that this could serve as a model for helping Connecticut industries to shift to safer chemical alternatives in the workplace and in manufacturing of safer products.	p.1
CT Water Works Association/BG	12/14/2012	EE, water conservation, WICA & Elec.	Allow recovery in rates for the installation of meters and equipment to promote water conservation which will allow more timely price signals; and Support programs at the utility level that offer customers incentives, rebates or retrofits for more water efficient fixtures and appliances. Expand WICA eligible projects to include the purchase of EE equipment or investments in renewables and capital improvements necessary to achieve compliance with stream flow regulations.	p. 2,3.
Environment Northeast	12/21/2012	Make industrial programs available to businesses, fuel switching, water conservation	Tailored industrial programs should be made available to commercial buildings as well because of small size of industrial sector and similar market segments. Support for fuel switching so long as it is cost-effective, lower carbon fuels are not more cost-effective and high efficiency measures are implemented concurrently. Water conservation would be a welcome innovation.	
Malkin Holdings Inc./AM	12/19/2012	COGEN	COGEN should be the cornerstone of the CES. The existing tariff structure places significant and artificial limitations on project developers and is an insurmountable obstacle to capital sources needed to develop new projects in CT.	

Industry Sector Comments				
Stakeholders	**Date Filed**	**Main Topic**	**Specific Issue**	**Page Cite**
Northeast Clean Heat & Power Initiative/TB	12/14/2012	CHP, DG tariff	Disagrees with CHP numbers- There is no citation for how the $2,000/kW avg. CHP system cost was derived. The note specifies "industrial" CHP, but as a generic cost estimate, this figure seems low, especially for commercial CHP. We believe that this "multi-facility" potential would greatly benefit from the option for meter aggregation, given the current structure of CT electric utilities' DG tariffs. In fact, NOT allowing meter aggregation for such sites is a potentially project-killing hindrance to multi-facility CHP. We ask that DEEP consider a bonus of additional $50/kW for prime movers meeting a "low emissions" threshold (e.g. fuel cells, microturbines, biogas engines/turbines, etc.).The structure of current DG tariffs must change from monthly max. demand charge(s) to at least daily "as-used" demand charge(s), so that CHP customers are not liable to lose entirety of demand savings for as little as a single 30-minute CHP outage in a billing period.	
Northeast Clean Heat and Power Initiative (NECHPI)	12/6/2012	CHP	p. 58- There is no citation for how the $2,000 kW average CHP system cost was derived. The note specifies "industrial" CHP but as a generic cost estimate, this figure seems low, particularly for commercial CHP.	
Northeast Clean Heat and Power Initiative (NECHPI)	12/6/2012	CHP	Also p. 58- Sentence begins, "The legislature also authorized grants and low interest loans ...." This does not mention that initial grants that created boom were up to $450/kW (notably in SW CT). Current gains are lower, at rates of $350/kW for <5MW (CEFIA) and $200 /kW for <1MW at DEEP.	
Northeast Clean Heat and Power Initiative (NECHPI)	12/6/2012	RPS/CHP	p. 59 Sentence begins "The 2012 IRP recommends that Class III renewable credits be limited to CHP.... They agree with limiting Class III RECs to CHP and considering Class I RECs for all prime movers meeting low emissions threshold (not just fuel cells but micro turbines, etc.).	

Industry Sector Comments				
Stakeholders	**Date Filed**	**Main Topic**	**Specific Issue**	**Page Cite**
Northeast Clean Heat and Power Initiative (NECHPI)	12/6/2012	CHP	p. 60 Sentence begins, "Beyond that identified..... They believe that this multi-facility potential would greatly benefit form the option for meter aggregation, given the current structure of CT electric utilities' DG tariffs. In fact, not allowing meter aggregation for such sites is a potentially project-killing hindrance to multi-facility CHP.	
Northeast Clean Heat and Power Initiative (NECHPI)	12/6/2012	CHP	p.61 Sentence begins, "To more fully capture the economic CHP potential,....." They agree with larger grant allowances for projects > 1MW and propose a return to at least the 2005-2008level of $450/kW. They ask that DEEP consider a bonus of additional $50/kW for prime movers meeting a "low emissions" threshold. p. 63- Sentence begins, "DEEP recommends that in order to more fully capture the economic CHP potential... " Same comments as previous.	
Rivers Alliance of Connecticut	11/25/2012	RPS/Hydro	With respect to Industrial Cooling Water the recommendations are: 1) Develop a comprehensive approach to industrial permitting that deals with water use and discharge early in the process. 2) Develop protective standards for upland water sources.	
Rivers Alliance of Connecticut	11/25/2012	RPS/Hydro	Conservation recommendations: 1) Implement the Draft's 3 recommendations for achieving conservation of drinking water and wastewater. Raise the surcharge margin in WICA. Require electric and gas utilities to include water conservation in their conservation plans. 2) Require public water utilities to meet the same conservation and efficiency standards as privately owned utilities. 3) Develop statewide, competitive rewards and awards for water conservation, similar to programs at UCONN Storrs.	

Industry Sector Comments				
Stakeholders	**Date Filed**	**Main Topic**	**Specific Issue**	**Page Cite**
Santa Energy Corp./TS	12/12/2012	NG, Propane	Argues numbers for C&I conversions to NG are incorrect, that for industry most of this conversion to NG has already taken place. In 2010 according to US DOE/EIA statistics natural gas comprised 77% of the Gas/Oil market in the commercial sector and 95% of the industrial sector. As a result the savings described for the commercial and industrial markets are vastly overstated. The strategy does not address the role of propane in the future energy portfolio other than to imply that it will be replaced by natural gas.	pp.1,2,3
UIL Holdings/UI/SCG/CNG	12/21/2012	CHP, ratepayer funding	DEEP should investigate potential for CHP to identify most successful places for heat utilization. DEEP should launch an investigation of public subsidies to ensure ratepayer funds produce adequate stream of benefits that accrue to all users to offset program costs. Potential for rebates to exceed expected payback - Department review would prevent this.	
Steven Winter Associates	12/14/2012	Ground Heat Source Pumps	Numbers used for Ground Source Heat Pumps is incorrect. The CES references an EIA study that shows total installed costs for ENERGY STAR GSHPs TO BE $8,000-$9,000 for homes. In SWA's experience in Connecticut, a more realistic value is closer to $30,000 for homes of average size (approx. 2,000 sq. ft.). Also, disagrees with GSHPs as renewable energy systems. From a basic engineering and thermodynamic perspective, this proposal has no merit. One technology that is largely dismissed in the CES document is air source heat pumps (ASHPs).	

Industry Sector Comments				
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Peter Tavino	11/14/2012	NG, Ground Source Heat Pumps	Believes more support is needed to ground source heat pumps. Addicting Connecticut users to a different fossil fuel only makes eventual conversion to ground source that much more difficult Urges DEEP to follow the State Health Dept. model to update policy and regulation by bringing in an advisory committee with ground source representatives from the private sector, who long to be heard beyond these public comment procedures.	
Mitch Kennedy	12/21/2012	Ground Heat Source Pumps, fuel switching, CHP, building codes	Page 59: Industry sector & GS Heat Pumps - Industry requires high Btu throughput. GSHP is inadequate substitute - Conversion to Bio-diesel inputs with locally grown and processed fuels would have multiple benefits - save agricultural land, increase a nascent sustainable industry, and decrease reliance on out-of-state resources and markets. Specific Appendix Comments: APPENDIX A, Page A-9: Fuel Switching - Broad generalizations in the Fuel switching category - as ground source het pumps - reference source is from 2007 - technology has advanced considerably since then and questions the accuracy of the larger estimates being made. CHP - Short shrift - no studies of potential market penetration into industrial sectors and offsets. Capital costs born by whom? Reference unclear - if this is the EPA Catalog of CHP its from 2008 - again old tech. Expanded Efficiency - Assumption that "code" will dictate consumer purchase oaf a improved efficiency furnace is faulty - it is not currently true. No building codes exists that specifies a specific level of efficiency. Page A-11: CHP - Benefits - Electricity rates overstated - large users (most appropriate CHP applications pay much less than $0.15 / kWh.) Also cogen is properly sized by heat load not electrical demand - so overall savings will also be smaller.	

Electricity Sector Comments				
Stakeholders	**Date Filed**	**Main Topic**	**Specific Issue**	**Page Cite**
Matthew Lesser, 100th District Representative, Connecticut General Assembly	12/21/2012	RPS	Applauds plan for its commitment to clean, renewable sources of energy and for proposing a possible expansion of the RPS requirements. Hopes that efforts to broaden the definition of Class I renewables be viewed with extreme caution. Doing so at this point would inject uncertainty into the marketplace and raise the possibility of diluting home grown green power with massive out-of-state alternatives.	p. 1
Matthew Lesser, 100th District Representative, Connecticut General Assembly	12/21/2012	Virtual Net Metering	Virtual net metering needs to be expanded.	p. 1
Clean Energy Finance And Investment Authority (CEFIA)	12/14/2012	Residential Financing	CEFIA has been working on a number of residential financing programs that will increase investments in renewable energy. Through collaborations with DEEP on repurposing ARRA-SEP funds and other programs, and partnerships with CEEF and other key stakeholders, more private capital investment will be attracted and deployed in Connecticut to increase renewable energy.	p. 6

Electricity Sector Comments				
Stakeholders	**Date Filed**	**Main Topic**	**Specific Issue**	**Page Cite**
Clean Energy Finance And Investment Authority (CEFIA)	12/14/2012	Residential Financing	The following is a list of residential financing programs that CEFIA is developing that support investments in renewable energy: 1) Solar PV Loans – through the use of ARRA-SEP funds, CEFIA is working in partnership with Sun gage and other investor(s) to provide up to $5.0 million in financial assistance to homeowners who seek to own solar PV systems. This pilot program will provide households with the necessary low-cost, long-term capital needed to deploy rooftop solar PV that they will own. This pilot program is expected to be launched in the first quarter of 2013; 2) Solar PV and Thermal Hot Water Leases – based on the success of the original pilot program,67 through the use of ARRA-SEP funds, CEFIA is working with tax equity, debt providers, and others to provide approximately $50 million in financial assistance to homeowners who seek to install solar PV and/or solar thermal hot water systems. This program provides households with a no upfront cost solution to installing rooftop solar PV and thermal hot water systems that is intended to lower their monthly energy costs through a lease payment. This program is expected to be launched in the first quarter of 2013; 3) Loan Competition -- CEFIA has used the Brattle Group to analyze the merits of using long term low cost financing to expand more quickly distributed solar installation in Connecticut. Based on the economic model developed by Brattle, we have tentatively concluded that we should provide up to ten million dollars of long term low cost financing to distributed solar projects in 2013. We will allocate the money pursuant to a RFP process.	p. 6

Electricity Sector Comments				
Stakeholders	**Date Filed**	**Main Topic**	**Specific Issue**	**Page Cite**
Clean Energy Finance And Investment Authority (CEFIA)	12/14/2012	Microgrids	CEFIA, through its predecessor the Connecticut Clean Energy Fund, has supported a number of fuel cell projects in the past that have served to provide high reliable power and heat during times of natural disasters or grid disruption. Installations of fuel cells at manufacturing plants have enabled businesses to operate while others can't because of grid failures. The deployment of fuel cells at local high schools has served to provide local shelters for people seeking refuge during natural disasters. The use of fuel cells in grocery stores across CT have allowed people to access the necessary food and water essentials during hurricanes, snow storms, and hot weather which have shown to be disruptive to the reliability of the electric grid. Given its experience with tax equity funds in the residential solar PV sector, CEFIA would like to investigate the potential for establishing similar fund for fuel cell deployment in important microgrid applications. CEFIA's Board of Directors has identified a need for continued support of deployment of high reliable clean energy sources such as fuel cells, and has established a placeholder budget for microgrids for Fiscal Year 2014.	p. 7
Clean Energy Finance And Investment Authority (CEFIA)	12/14/2012	Microgrids	CEFIA seeks to expand upon the value proposition of clean and renewable distributed generation to Connecticut businesses and residents. Many customers in the residential and small-commercial PV-market purchase solar-PV systems under the incorrect assumption that they will provide backup power and operate autonomously when the grid is down. Indeed, this is not currently the case. Through its financing programs, CEFIA intends to pilot a program that enables small residential and commercial solar-PV installations to remain operational and serve as a back-up power source when the grid is disrupted. This pilot will require collaboration between solution providers, installers, the utilities and DEEP.	p. 7

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Stakeholders	**Date Filed**	**Main Topic**	**Specific Issue**	**Page Cite**
Clean Energy Finance And Investment Authority (CEFIA)	12/14/2012	Munis/Soft Costs/Solar	In order to continue to drive down the costs of clean energy deployment in CT, it is necessary to identify and take advantage of opportunities to reduce soft or non-hardware costs along with hardware costs. Development/implementation of streamlined and standardized processes and fees at the local jurisdiction and at the state level will allow installers to offer (and consumers to access) more affordable clean energy sources. For example, reduction of soft costs for rooftop solar PV and small hydropower will help enable increased deployment of these technologies.	p. 7
Clean Energy Finance And Investment Authority (CEFIA)	12/14/2012	Munis/Soft Costs/Solar	CEFIA won a U.S. Department of Energy, SunShot Initiative, Rooftop Solar Challenge grant to reduce non-hardware costs associated with rooftop solar PV. Non-hardware costs represent between 30 to 50% of the cost of a rooftop solar PV system, and include costs such as customer acquisition costs (being addressed through the Solarize Program) and permitting, inspection and interconnection costs and fees.	p. 7
Clean Energy Finance And Investment Authority (CEFIA)	12/14/2012	RPS/Hydro	Small-scale hydropower remains a relatively untapped source of local renewable energy. DEEP and legislature should support initiatives that streamline local, state and federal permitting requirements and processes. DEEP and legislature should consider development of appropriate processes that would enable site access and development of publically owned dams by private small-hydro developers. Such initiatives would help to expand CT's locally generated renewable energy options as well as provide potential revenue sources for DEEP through lease or off-take agreements.	p. 8

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Stakeholders	**Date Filed**	**Main Topic**	**Specific Issue**	**Page Cite**
Clean Energy Finance And Investment Authority (CEFIA)	12/14/2012	RPS/Solar	Local jurisdiction and state level changes to reduce (and potentially cap) permitting fees would encourage deployment of solar PV, as would adoption of guidelines and practices to streamline permitting practices and processes. Related to this, EDCs should be tasked by PURA to review interconnection processes for rooftop solar PV, eliminating any unnecessary requirements and costs. Specific, detailed policy recommendations for reducing soft costs will be provided through CT's SunRise Rooftop Solar Challenge Project in March 2013.	p. 8
Clean Energy Finance And Investment Authority (CEFIA)	12/14/2012	RPS/Geothermal	In an effort to achieve the 2020 RPS goal at the lowest cost while creating local jobs, CEFIA encourages the inclusion of thermal energy production from in-state sources as an eligible Class I resource within the RPS. Thermal resources would provide another opportunity for CT to support policy allowing for locally developed and deployed energy projects to help achieve the goal of energy supply diversification and energy system resiliency. Recognizing solar thermal as a Class I resource is a start. Other states (like Maryland, New Hampshire, North Carolina and Wisconsin) have begun to classify thermal energy technologies as part of their RPS requirements. Moreover, some thermal technologies provide greater energy, economic development (jobs), and environmental benefits than currently eligible RPS renewable energy technologies. These thermal technologies can also offer consumers that are unable to access natural gas, due to an inability to access the infrastructure expansion, a renewable choice versus other fossil fuel resources.	p. 8

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Stakeholders	**Date Filed**	**Main Topic**	**Specific Issue**	**Page Cite**
Clean Energy Finance And Investment Authority (CEFIA)	12/14/2012	Reliability/Security	Long-Term Contracts for Grid Reliability and Diversification of Domestic RPS Resources – Section 71 of PA 07-242 "An Act Concerning Electricity and Energy Efficiency," allows the electric distribution companies (EDC) to engage in long-term contracts for no more than fifteen (15) years for Class I, II and III renewable energy sources. Department of Public Utility Control (DPUC) Docket No. 07-06-61 "DPUC Examination of Electric Distribution Company Contracts for Renewable Energy Certificates," establishes a process for the implementation of Section 71 of PA 07-242 allowing, but not requiring, the EDCs to procure long-term contracts between 4 to 10 years for Class I resources only. CEFIA recommends that for technologies that provide grid reliability benefits (i.e. fuel cells, solar PV with battery back-up, CHP, etc.) during times of a natural disaster, or for projects that diversify the state's capacity to meet our RPS goals with domestic resources that the PURA: 1) Allow Class III resources, in particular CHP, to have access to long-term REC procurement to provide grid reliability benefits during grid outages; 2) Extend the length of the regulatory established contract period from 10 years to the statutorily allowed fifteen years; and 3)Outside of the ZREC-LREC policy, require that the utilities solicit projects for long-term Class I resources that provide grid reliability benefits, or that diversify the state's capacity to meet our RPS goals with domestic resources, to receive long-term contracts at a REC price that reduces the IRP projected long-term cost burdens on ratepayers at a cost not to exceed the alternative compliance payment.	pp. 8-9

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Stakeholders	**Date Filed**	**Main Topic**	**Specific Issue**	**Page Cite**
Clean Energy Finance And Investment Authority (CEFIA)	12/14/2012	Virtual Net Metering	Virtual Net Metering – CEFIA suggests a modification to the existing Virtual Net Metering (VNM) law which limits VNM to municipalities and further limits its use to clean energy projects that are owned by the municipality. Most municipalities opt to lease or deploy a clean energy project through a third-party ownership model as to achieve tax credit and other benefits and value that would otherwise not be realized by a municipal project. Given the merger between Northeast Utilities and N-Star, consideration should be given to standardize net metering policies between Connecticut and Massachusetts, taking the best practices from each state and creating a uniform policy approach across the border on net metering. An area of opportunity for Connecticut would be to consider allowing neighborhood net metering—which Massachusetts has enacted—which would allow residents, businesses and municipalities to invest in and benefit from the most efficient distributed generation sites.	p. 9
Clean Energy Finance And Investment Authority (CEFIA)	12/14/2012	RGGI	RGGI Allowance Proceed Regulations –CEFIA would like to suggest an amendment to the RGGI regulations that apply to CEFIA. The current regulations limit CEFIA's use of RGGI proceeds to Class I resources defined in C.G.S. 16-1(26). CEFIA would like the ability to support other clean energy resources and projects captured within the definition of C.G.S. 16-245n. C.G.S. 16-245n captures all of the resources referenced in 16-1(26) as well as thermal energy, energy efficiency financing, and alternative fuel vehicles and associated infrastructure. The inclusion of C.G.S. 16-245n would allow CEFIA to make investments in projects that further support the state's energy and environmental goals, as well as local economic development. For example, the use of RGGI allowance revenues for thermal technologies can deliver higher greenhouse gas reductions and job creation benefits (see Table 1 - "Job and Emission Benefits from the Deployment of Various Clean Energy Strategies).	p. 9
Connecticut Siting Council	12/14/2012	Reliability/Security	Given that generation is an integral component to electric system, it needs to be added to transmission security segment; resiliency of BOTH generation and transmission is critical to a secure, stable and reliable electric system.	p. 1

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Stakeholders	**Date Filed**	**Main Topic**	**Specific Issue**	**Page Cite**
Connecticut Siting Council	12/14/2012	Reliability/Security	Strategies need to be developed to address potential calamity; a program to relocate or "harden" facilities susceptible to flooding and/or storm surges should be implemented.	p. 1
Connecticut Siting Council	12/14/2012	Reliability/Security/ Undergrounding	On draft CES's statement that cost of putting power lines underground averages about $11M/mile, CSC wants the $11M qualified for transmission or distribution.	p. 1
Connecticut Siting Council	12/14/2012	Infrastructure	On page 96, the draft CES reads, "In addition, Connecticut's siting policies can dramatically impact the cost and options for building transmission. Those policies should promote--and not deter--the construction of appropriate infrastructure." CSC finds these statements to be broad in scope and the conclusions to be generalized, and CES does not expound further on what policies, specific costs or options are referenced. CSC suggests that these two sentences be stricken from CES, or a description of solutions be offered instead.	p. 2
Connecticut Siting Council	12/14/2012	Munis/Soft Costs/Solar	On page 103, the draft CES proposes that the State and munis work together to streamline permitting, siting, and other requirements to help reduce soft costs involved in solar PV installations. While stating that most if not all roof-top PV installations were not reviewed by CSC, CSC recognizes that fragmented rules governing permitting, siting and other requirements do exist and need clarification; and therefore, CSC stands ready to streamline the process.	pp. 2-3
Connecticut Siting Council	12/14/2012	Reliability/Security	On the CSC reference in 1st paragraph of recommendation #11, CSC reports that it is preparing a draft study on feasibility of requiring backup power for telecom towers/antennas, for submission to PURA in 1/13. CSC suggests that this paragraph be clarified by listing recommendations outlined in Two Storm Panel Commission Report and/or resulting legislative directives.	p. 3

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Stakeholders	**Date Filed**	**Main Topic**	**Specific Issue**	**Page Cite**
Office of Consumer Counsel	12/21/2012	Decoupling/Rates	Given anticipated storm recovery costs, infrastructure hardening measures, the fact that natural gas prices have already fallen far, and that those low prices will now be enjoyed by all retail customers, etc., the all-in electricity price may well have already ebbed as of 2013. Thus, while additional programs, projects, and approaches may nevertheless be worthwhile, at this stage it is probably no longer true that programs that add costs can be achieved while keeping electricity costs at or below current levels.	p. 3
Office of Consumer Counsel	12/21/2012	Decoupling/Rates	OCC has not seen evidence that electric utility returns on capital have been a cause of under-investment or have led to other negative consequences. The sufficiency of rates of return on capital is a complicated and multi-faceted financial issue based on such matters as financial formulae, market conditions and interest rates, proxy groups of similar utilities, and other information. Although a national survey like the RRA study may be of note, it is no substitute for a rate case on this issue. The final CES should remove references to the sufficiency of utility rates of return.	p. 3
Office of Consumer Counsel	12/21/2012	Procurements	Regarding a statement made on page 73, "that the regional wholesale market, operated by ISO NE, procures needed generation using an auction market that induced investment in new generation capacity and which provides high reliability," OCC states the reality is that the set of regional electricity markets (including the electric energy market, the FCM, and the Locational Forward Reserve Market) have not actually been successful of late in bringing new generation capacity to fruition, in part because of financing difficulties. There is, as yet, no evidence that the short-term price signals offered through ISO-NE markets will lead to adequate financing and development of power plants when and where needed. There is even less evidence that they will do so at a reasonable price. The referenced sentence should therefore be revised to reflect that reality.	pp. 27-28

Electricity Sector Comments				
Stakeholders	**Date Filed**	**Main Topic**	**Specific Issue**	**Page Cite**
Office of Consumer Counsel	12/21/2012	Smart Grid/Metering/TOU	CES discusses demand response promotion (pp. 83-84), advanced metering opportunities (84), and the potential benefits of dynamic pricing (85-86). Depending on the cost-benefit analyses, OCC may support any of these in a case-by-case basis, and the CES is right to consider such projects. However, one must proceed with caution in this area to avoid overpayments or working at cross-purposes. Generally speaking, OCC anticipates that the closer that we move toward dynamic pricing over time, the less we will need to have programs and subsidies to promote demand response. Dynamic rates would cause the economic value of reducing power usage to already be reflected in the energy price, and then we could discern the price elasticity of usage and plan the system accordingly. In at least some circumstances, 'paying' a customer to reduce electricity usage through a demand response program, while the dynamic rates were encouraging the same non-use of power, would lead to overpayments. Of course, as reflected by the existence of the FCM, energy is not always the whole picture, so there may be some value on the capacity side of continuing some demand response programs under fully dynamic rates. The larger point is that the interaction between dynamic pricing/advanced metering goals and demand response goals needs to be tracked. The existence of the CES process (as well as IRP) will encourage such tracking.	p. 29

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Stakeholders	**Date Filed**	**Main Topic**	**Specific Issue**	**Page Cite**
Office of Consumer Counsel	12/21/2012	Smart Grid/ Metering/TOU	OCC notes that there are interesting interactions between advanced metering/dynamic pricing and retail choice. They go into these interesting aspects in detail. They conclude, that looking way down the road, one possible means of solving this problem is for the state to adopt, as part of an advanced metering infrastructure build-out, a requirement that all retail offerings (including standard service) contain at least a base level of 'dynamism,' so that there are choices of flatter and more volatile rates but not an option that is so flat as to strand the advanced metering infrastructure investment. In sum, OCC perceives that there is a general tendency, although not necessarily reflected in the Draft, to assume that all modern approaches like demand response, advanced metering/dynamic pricing, and retail choice mesh together well and are mutually enabling. That is not so; the interactions are complicated and at times conflicting. So, for example, it may not be prudent to pursue the large cost of advanced metering infrastructure, unless we have a decent handle on how many customers, including those exercising retail choice options, will experience dynamic rates. The cost/benefit analysis for the advanced metering infrastructure cannot be done properly without that information.	pp. 30-31

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Stakeholders	**Date Filed**	**Main Topic**	**Specific Issue**	**Page Cite**
Office of Consumer Counsel	12/21/2012	RPS/Wind	On page 90 of draft CES, "...the best wind resources can now compete with natural gas generation." OCC is not certain that this statement is true even on a per kWh basis. Natural gas generation can come in base load, intermediate, and peaking varieties. More generally, wind and other intermittent resources should generally not be treated as comparable to natural gas or other fossil fuel generation. ISO-NE, with support from FERC, will continue to insist that CT and NE have ample capacity that can be summoned to operate in certain MW amounts, in certain locations, within a short or at least defined time frame. Wind and solar cannot presently meet those demands (as recognized on page 96, stating that, "some renewable power technologies..."), so wind and solar generation do not generally replace fossil fuel generation capacity; they add to it. In short, the comparison of wind and solar plants to natural gas plants is not meaningful for planning purposes given current technology.	pp. 31-32
The Berkshire-Litchfield Environmental Council	12/13/2012	Other Electricity Sector Comments	Reliance on the leveraging of private capital through 'innovative financing via the Green Bank is not without risks. This public/private financial "partnering" is vague and has no well-established ethical parameters between corporate interests v. environmental protection/integrity. The entire concept is fraught with potential conflicts when business interests are so closely co-mingled with matching taxpayer funding. The Green Bank is a new wrinkle in blurring the line between public and private interests.	pp. 4-5
The Berkshire-Litchfield Environmental Council	12/13/2012	Smart Grid/Metering/TOU	Given "overwhelming resistance" in at least 18 states regarding smart metering, as well as a re-examination of the intelligence of the entire smart grid concept by think-tanks and key agencies at federal level, BLEC is "bewildered" about draft CES's placement of the adoption of the 'smart' grid, advanced 'smart' metering, and time-of-use pricing as a cornerstone in Electric chapter.	p. 6
The Berkshire-Litchfield Environmental Council	12/13/2012	Smart Grid/Metering/TOU	Draft CES does not mention health concerns relative to radiofrequency radiation (RF). State should not commence in direction of smart grid/metering in light of health concerns. To do so not only endangers public health, it also puts the State in line for litigation.	p. 18

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Stakeholders	**Date Filed**	**Main Topic**	**Specific Issue**	**Page Cite**
The Berkshire-Litchfield Environmental Council	12/13/2012	Smart Grid/Metering/TOU	Privacy is of enormous concern with smart grid/metering, and constitutional issues are on the table. This alone is reason to halt the deployment until such time as questions are settled.	p. 19
The Berkshire-Litchfield Environmental Council	12/13/2012	Reliability/Security/Cyber	The smart grid/metering creates security vulnerabilities that never existed with the old hardened utility grid in large part due to new IT connectivity. The smart grid as currently designed cannot be made safe from cyber attack, according to may experts, and it is more vulnerable to solar storms than older utility grid.	p. 20
The Berkshire-Litchfield Environmental Council	12/13/2012	Smart Grid/Metering/TOU	Smart meters have started thousands of fires due, in part, to poor training of temp installers, but also to defective meter manufacture. There are reports of appliances acting erratically after smart meters are installed. In addition, smart meters are not UL listed for safety. Also, there are billing errors galore after smart meters have been installed (there is a class action suit in CA because of rampart problems there).	p. 24
The Berkshire-Litchfield Environmental Council	12/13/2012	Smart Grid/Metering/TOU	No one has shown significant energy savings with either near-real-time energy use knowledge on the part of consumers or tiered pricing. Many people/businesses simply cannot change when or how they use energy. Tiered pricing automatically penalizes the elderly, the self-employed, the infirmed, the unemployed, stay-at-home parents with young children and anyone else who functions on a normal daylight schedule.	p. 26
The Berkshire-Litchfield Environmental Council	12/13/2012	RPS/Wind	Relative to wind generation, CES should specifically reference and require that the US Fish & Wildlife Service's recommendations for wind energy development through its "2012 Wind Energy Guidelines" be strictly followed. Without doing so, the wind developer, their consultants, and the State could be in violation of federal laws protecting the environment.	p. 33
The Berkshire-Litchfield Environmental Council	12/13/2012	RPS/Wind	DEEP should require safer, lower turbine designs such as vertical-axis wind turbines, especially for interior land sites. The CES should require industrial, bladed turbine setbacks of at least 1.24 miles. CT Siting Council's setback of 1.1 times the height of the wind turbine is nowhere near enough.	p. 33

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Stakeholders	**Date Filed**	**Main Topic**	**Specific Issue**	**Page Cite**
The Berkshire-Litchfield Environmental Council	12/13/2012	RPS/Wind	CES should include provisions to reduce shadow flicker, ice throw, infrasound, dirty electricity, and to require additional/better environmental review near protected lands.	p. 34
The Berkshire-Litchfield Environmental Council	12/13/2012	RPS/Wind	There should be a time limit imposed on when wind facilities must be built after site approval, after which the approval is automatically rescinded.	p. 34
The Berkshire-Litchfield Environmental Council	12/13/2012	RPS/Biomass	Disappointed CES does not mention potential for wood as clean fuel for energy generation. The technology has come a long way toward incorporation of small-scale facilities that "run so clean no one knows they are present."	p. 34
Bike/Walk Connecticut	12/18/2012	RPS	CT should focus on investing state funds in efforts that will keep our money here creating jobs, and not leaving the state to buy more fossil fuels.	p. 1
Bike/Walk Connecticut	12/18/2012	GHG Emissions Reductions	CT should set specific targets for significant reductions in GHG and other pollutants that will help us meet the requirements of PA 11-80.	p. 1
Bristol Resource Recovery Facility Operating Committee	12/14/2012	RPS/WTE	BRRFOC is made up of 14 towns and cities and is charged with safe, environmentally sound and cost-effective disposal of municipal solid waste. It supports the concept of including WTE as a Class I renewable energy source under the CT RPS, provided that revenues derived from sale of RECs serve to reduce costs to municipalities and taxpayers. The municipal tax exemption (electric generation tax) needs to be maintained.	
Brookfield Renewable Energy Group	12/14/2012	RPS	Believes that the ultimate outcome of the RPS re-evaluation will be critical to achieving the Governor's multifaceted objectives.	p. 1
Brookfield Renewable Energy Group	12/14/2012	RPS	Reduced liquidity in RECs is apparent, representing a meaningful cost impact on electricity consumers in MA and CT. Reducing this cost burden means increasing eligible supply in these markets.	p. 2

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Stakeholders	**Date Filed**	**Main Topic**	**Specific Issue**	**Page Cite**
Brookfield Renewable Energy Group	12/14/2012	RPS/Hydro	It is important to note that large-scale hydro imports are often configured as a system-wide resource, from systems that have strong interties with each other, highly emitting jurisdictions. There is no guarantee that this 'system power' has not been originated from fossil-fuel based non-renewables mixed with clean hydropower. Furthermore, if such large-scale import is tagged from Canada to the qualifying resource of its origin, the cost of power plus associated transmission is likely to be prohibitive for CT ratepayers given the cost of developing new large-scale resources. As such, imports of large-scale hydro from Canada cannot be assumed to meet the stated goal of the RPS review to meet the Governor's commitment to cheaper and cleaner power.	p. 2
Brookfield Renewable Energy Group	12/14/2012	RPS/Hydro	Believe strongly that other solutions besides large-scale hydro from Canada exist to deliver more renewable energy to CT and achieve State's objectives. Such solutions will complement the existing plans to develop renewable energy in the region by providing a measured amount of near-term supply to the market and addressing inconsistencies in the current RPS design.	p. 2

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Stakeholders	**Date Filed**	**Main Topic**	**Specific Issue**	**Page Cite**
Brookfield Renewable Energy Group	12/14/2012	RPS	Carefully reducing restrictions on vintage and size for select low-impact renewable resources, particularly in Class I markets, would provide a better balance in ratepayer costs, and environmental and economic benefits of the RPS. This is particularly the case for older vintage, smaller-scale hydro resources, which are important contributors to renewable energy supply in the region and provide a cornerstone for green jobs, yet are not meaningfully recognized in the RPS. This is important to consider for three reasons: (1) it cannot be assumed that these resources will be able to operate continually and efficiently to provide renewable energy to the grid without appropriate revenue streams over time that are commensurate with newer resources that currently qualify for the RPS; (2) a diverse portfolio of renewables is important to ensuring system reliability; and (3) a carefully designed marginal change in eligibility has the ability to provide much needed liquidity to the CT REC market without flooding the market and undermining the basic policy objectives of the RPS. Lastly, it is important to consider that the qualification of older resources can be coupled with third part low-impact certification to ensure a balance of appropriate scale, environmental benefit, and cost.	pp. 2-3

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Stakeholders	**Date Filed**	**Main Topic**	**Specific Issue**	**Page Cite**
Brookfield Renewable Energy Group	12/14/2012	RPS	Enabling imports from non-adjacent areas: enabling imports of qualifying renewable resources from non-adjacent control areas would significantly improve market efficiency without relying on one importing jurisdiction such as Quebec. Indeed such reliance risks substantial additional cost burdens on CT electricity customers over time. In 2009 NEPOOL Board of Review recommended NEPOOL-GIS amend its operating rules to include eligible renewable energy generated in non-adjacent control areas into the New England RE market. REC market efficiency in New England is currently hindered by inefficiencies associated with artificial RPS restrictions and limited renewable energy resources in the region. while it is commendable that Ct continues to work with NESCOE to coordinate competitive procurement of RE in the region, it is also important to consider the impact on CT customers and interests. Enabling imports of RE from non-adjacent control areas takes advantage of basic market fundamentals that reduce the cost of developing RE for all customers, while ensuring that incremental reductions in fossil fuel use result.	p. 3

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Stakeholders	**Date Filed**	**Main Topic**	**Specific Issue**	**Page Cite**
Brookfield Renewable Energy Group	12/14/2012	RPS	Ensuring that renewable energy qualifying for the RPS is tracked to the generating unit of its origin is critical to ensuring the ongoing integrity of the program.	p. 3
Brookfield Renewable Energy Group	12/14/2012	RPS	Improving conditions for long-term contracting of renewable energy would help to encourage a stable platform for development and adoption of renewables. NESCOE's coordinated competitive renewable power procurement work plan was released in Nov 2012, with a goal of issuing solicitation by Dec 2013. While this is an important step toward providing stable and predictable economics for development of new projects, it is important to also consider the ongoing ability of utilities to contract for long-term capacity and renewable energy in accordance with fair market principles. BREG would encourage DEEP to consider a targeted regulatory review to identify and remove disincentives, where they may exist, to state utilities for long-term contracting for renewable energy.	p. 4
Brookfield Renewable Energy Group	12/14/2012	RPS	BREG looks forward to learning more about the RPS review process and would like to reiterate the importance of stakeholder consultation in this process.	p. 4
Class III CHP Organization	11/15/2012	CHP	Generally supports the CES. With respect to recommendations to expand conservation and load management funding, C3CO members have invested in energy efficiency and strongly support increased energy efficiency in the state. C3CO is not opposed to increased funding support for cost-effective energy in the state. However, members are concerned that expanded ratepayer funding of CL&M will have unintended consequences for CT's already saturated Class III market. In their view the CES recommendations in the Industry section to limit the Class III program to just CHP is designed to address in part this concern.	
Class III CHP Organization	11/15/2012	CHP	As DEEP develops the RPS, C3CO offers that in addition to limiting the Class III market to CHP resources, as recommended in the CES, the1%/kWh floor price must also be preserved. The high level of capital investment required for CHP makes CHP developers more sensitive to long-term revenue predictability.	

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Class III CHP Organization	11/15/2012	CHP	While the CES suggests that removing ratepayer-funded CL&M projects from the program would help prices to move above the current floor, the fundamentals of supply and demand in the Class III program do not necessarily dictate that result. Even without CL&M projects included in the Class III program, there's a healthy amount of CHP projects eligible to earn Class III credits which could result in prices moving below the floor price.	
Clean Water Action	12/21/2012	RPS/Hydro	We strongly oppose allowing large-scale dam-based Canadian hydro to qualify for incentives by Connecticut ratepayers. It simply sends money from Connecticut our of the country to support environmentally damaging projects that are backed by a foreign government. There are no additional reliability, energy price or environmental benefits from allowing large-scale Canadian hydro to count towards the RPS. It will have the effect of reducing investment in state and in-region in wind projects, fuel cells and other Class I technologies. If CT wishes to procure Canadian energy resources outside the RPS, it should do so through a competitive process that values energy, emissions and transmission costs, rather than picking winners through bilateral deals with companies like Hydro Quebec.	p. 3
Clean Water Action	12/21/2012	Procurements	Connecticut needs to reduce its near-complete reliance on natural gas to generate electricity and subsequent vulnerability to increases in gas prices or supply disruptions. Connecticut should meet its RPS goals, stabilize electricity rates, and spur new projects by soliciting long-term contracts for electricity and RECs with in-region Class I generators.	p. 3
Clean Water Action	12/21/2012	RPS/WTE	We strongly oppose additional subsidies from electric ratepayers to polluting, and increasingly uneconomic trash incinerators. The RPS is intended to support new and clean energy sources, and including existing incinerators in Class I wastes ratepayer money with no additional value. As the state ramps up its nation-leading recycling, producer take back and composting programs, their economics will likely worsen. DEEP should not pick winners on waste and wrongly put incineration before source reduction and recycling.	p. 3

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Stakeholders	**Date Filed**	**Main Topic**	**Specific Issue**	**Page Cite**
Clean Water Action	12/21/2012	GHG Emissions Reductions	Connecticut needs to increase its use of renewable energy to meet our state's climate goals. There is no analysis here of the benefits of increased renewable generation on emissions and the expansion of renewable energy policies beyond the 20% by 2020 RPS to ensure we reach the 2020 and 2050 climate targets. There is no analysis of generation scenarios after the Millstone Units are retired, or for the ability of renewable energy to displace the state's last oil and coal-fired generating facilities.	p. 3
Clean Water Action	12/21/2012	Reliability/Security	The CES should recommend that each town in Connecticut have shelter facilities able to house residents, conduct emergency operations, and meet basic food and medicine needs even in the event of disruptions in electricity, natural gas and gasoline supplies.	p. 3
Clean Water Action	12/21/2012	Microgrids	The existing microgrids program is entirely inadequate (with only $15 million for non-generation infrastructure for the entire state) and possibly unworkable due to existing utility regulatory law and standards. Class III and LREC could be expanded and targeted to support generation for microgrids.	p. 3
Clean Water Action	12/21/2012	Reliability/Security	A portion of investments on new natural gas mains would be better invested to ensure the safety and well-being of Connecticut residents in emergencies and extreme weather events.	p. 3
Clean Water Action	12/21/2012	Reliability/Security	The energy plan is silent on resiliency and reliability for individual residents. As the two 2011 storms and Superstorm Sandy demonstrated, energy policy can literally be life and death for residents. The current situation when a storm hits and the power grid goes down, results in entire communities losing electricity, communications, and as seen in New Jersey, also gasoline or diesel based transportation and emergency generators. At a community level we need some homes need to stay online and able to access radio and TV to get emergency information. We need some homes to have heat and power to help vulnerable neighbors through the crisis.	p. 4

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Stakeholders	**Date Filed**	**Main Topic**	**Specific Issue**	**Page Cite**
Clean Water Action	12/21/2012	Reliability/Security	Connecticut needs revamp its renewable policies to incentivize and help finance residential solar power with in-home back-up systems (or electric vehicles), support renovations and new home construction which combine solar power systems, back-up and ductless heat pump heating. Over time all new homes constructed and renovated should be safe and secure homes.	p. 4
Clean Water Action	12/21/2012	GHG Emissions Reductions	We support DEEP's consideration to push for a lower emissions cap that represents a significant decrease from actual emissions and which will put us on track to 80% reductions by 2050. This cap should be at least 20% below current levels by the year 2020.	p. 5
Clean Water Action	12/21/2012	GHG Emissions Reductions	DEEP should revise the state climate change action plan to recommend strategies to achieve the 2020 and 2050 targets and to inform CES.	p. 5
Connecticut Council of Small Towns	12/13/2012	Performance Contracts	On utilizing energy savings performance contracts, State should: (1) provide technical and legal expertise in negotiating performance contracts; 2) facilitate partnerships with neighboring and non-contiguous communities; and (3) identify/address barriers to participation by small towns that may not have staff resources or technical expertise.	
Connecticut Council of Small Towns	12/13/2012	Virtual Net Metering	CCST supports draft CES's recommendations to expand opportunities for towns to reduce electric costs through the use of virtual net metering.	
Connecticut Council of Small Towns	12/13/2012	Munis/Soft Costs	To help reduce municipal electric bills, State should: (1) eliminate fees on electric bills that drive up costs, including the Competitive Transition Assessment and the energy generation tax; (2) continue to support renewable energy programs to assist towns in using solar, fuel cells and other energy efficient technologies; (3) expand the C&LM program plans of EDCs/LDCs to include specific efficiency programs for water/wastewater utilities.	

Electricity Sector Comments				
Stakeholders	**Date Filed**	**Main Topic**	**Specific Issue**	**Page Cite**
Connecticut Council of Small Towns	12/13/2012	Reliability/Security	To enhance storm preparedness & response, State should: (1) ensure greater grid resilience through tree trimming, hardening of wires and poles; (2) support use of information technologies that allow electric suppliers to track/restore outages more quickly and improve communications with town officials and residents; (3) ensure that electric, telecommunications and gas companies meet performance standards, including deploying sufficient resources to pre-position crews and coordinate out-of-state crews; (4) assist smaller communities in using microgrids to ensure that critical facilities remain in service during outages.	
CT Coalition for Environmental Justice	12/18/2012	RPS/WTE	Trash incineration is not named a Class I renewable. Incineration competes with recycling for material. How can a resource that emits high levels of air toxins, including dioxin belong in a category reserved for truly green energy sources like solar and wind?	p. 1
Connecticut Coalition for Environmental Justice	12/18/2012	RPS/WTE	Strongly opposes trash incineration in the City of Hartford; urges that incineration of waste be phased out and not be considered as a renewable energy source for three reasons: (1) release of dangerous toxins; creates a disincentive to fully move forward with recycling; and incineration leaves highly toxic ash, that when buried in landfills, it eventually seeps into ground water.	p. 1
CT Coalition for Environmental Justice	12/18/2012	RPS	Strong incentives should be offered to property owners to install more solar and wind on their buildings.	p. 1
CT Forest & Park Association	12/14/2012	CHP	There are numerous opportunities to incentivize small-scale CHP facilities that could utilize debris from fallen trees as well as wood chips/pellets as fuel. If DG is one of the goals to provide a more stable, non-fossil fuel based energy profile in CT, this should be considered as a potential part of the mix, or certainly an area worth studying (this is done in VT, for example).	p. 1
Connecticut Fund for the Environment	11/15/2012	General	They support many elements of the CES, deploying renewable energy, efficient CHP, submetering, virtual net metering, microgrids, smart grids, RPS and more.	
Connecticut Fund for the Environment	11/15/2012	RPS/Hydro	There is no great benefit for the RPS to include Canadian hydro, which does not require further subsidization.	

Electricity Sector Comments				
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Connecticut Fund for the Environment	11/15/2012	RGGI	CES provides great changes to RGGI, such as lowering the cap, including emissions from electricity that is imported from other states, and retiring previously unsold allowances. CFE hope the State will put its full weight behind these things.	
Connecticut Fund for the Environment	12/20/2012	GHG Emissions Reductions	Draft CES only occasionally attempts to quantify the GHG emissions reductions from different policies and never fully frames the overall challenge of steadily decreasing our GHG emissions from now until 2050. Ideally, the final CES would contain a comprehensive evaluation of the overall impacts on GHG emissions going forward and would select policies that will cost-effectively reach our GHG reduction goals. More realistically, the final CES should perform a more robust overall framing of GHG issues, and examine the major policy proposals for their impacts on GHG in order to demonstrate the additional scale of our challenge for 2020, 2030, 2040 and 2050. At a minimum, the final CES must not advocate for any policies that are flatly inconsistent with meeting the legally binding 2020 or 2050 targets.	pp. 4-5
Connecticut Fund for the Environment	12/20/2012	GHG Emissions Reductions	Over the past decade, GHG emissions from electric generation facilities in CT have declined substantially. The challenge going forward is to continue this progress.	pp. 11-12
Connecticut Fund for the Environment	12/20/2012	Munis/Soft Costs/Solar/ Submetering/ Virtual Net metering	CES's Electricity chapter contains a great discussion of step that can be taken to decrease the "soft costs" of solar PV installations. Submetering and virtual net metering will make it easier for building owners to capture full value of installing renewable generation. These steps collectively have the potential to allow big progress in the continued development of renewable sources of generation across CT and NE.	p. 12

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Connecticut Fund for the Environment	12/20/2012	RPS/Hydro/WTE	Draft CES contains suggestions of two policies, although not fully articulated, that potentially represent a backwards step: (1) incorporating large Canadian hydropower projects as part of Class I RPS; and diluting the Class I RPS relative to waste-to-energy facilities. The Canadian gov't has already committed to the Canadian hydropower projects and those projects do not need additional incentives from CT ratepayers. If included in Class I RPS targets, the large hydro projects would swamp all other new sources of renewable energy. CT's current waste disposal policies are far from ideal and incineration of waste currently emits local pollutants and GHG.	pp. 12-13
Connecticut Fund for the Environment	12/20/2012	Submetering/Virtual Net Metering	CFE noted that green-building developer Bruce Becker testified at the Hartford tech meeting about the numerous difficulties he has encountered in attempting to receive PURA approval on issues related to his building projects. Based on that experience, CFE believes it will be important for legislation on submetering and virtual net metering to give clear standards and deadlines in order to overcome any reluctance at PURA.	p. 13
Connecticut Geothermal Association	11/27/2012	RPS	CT needs to expand its renewable portfolio, not subsidize the natural gas industry.	p. 1
Connecticut Geothermal Association	11/27/2012	RPS/Geothermal	CT needs to recognize geothermal as a Class I renewable as other states and the federal government do. This would allow the trading of RECs for our clean energy policies in the state. There is no other technology available today that can match geothermal efficiencies.	p. 1
Connecticut Geothermal Association	11/27/2012	RPS/Geothermal	CT needs to set the requirements for our utilities to look at BTUs saved and not kWh used. The Governor's policy itself uses this language. State government should set the policy for utilities to speak with the same language. No other technology can provide speak demand reduction and BTUs saved like geothermal.	p. 1
Connecticut Geothermal Association	11/27/2012	RPS/Geothermal	A shift toward geothermal technology as the heating and cooling choice in CT would prevent the burden of our ratepayers, taxpayers, and the state from funding the extension of natural gas pipelines. The burden of pipeline extensions should be placed on no one other than the utility who will receive the monies from those same extensions.	p. 1

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Stakeholders	**Date Filed**	**Main Topic**	**Specific Issue**	**Page Cite**
Connecticut Geothermal Association	11/27/2012	RPS/Hydro	The state and utilities serving CT should focus more on power plant and transmission line upgrades than trying to monopolize our energy future. We should not support the Canadian Hydro power option. CT needs to look at how our own energy needs affect other states. This is why Canadian Hydro is a bad idea and natural gas from fracking fields is a bad idea.	p. 1
Connecticut State Council of Machinists	12/11/2012	RPS/Hydro	Supports commitment to Canadian hydro project, but questions whether: (1) it is politically feasible to run transmission lines through adjacent states to get to CT; (2) significant power loss occurs from transmission over such distances; and (3) participation in this project would result in CT becoming captive to source, and future rate hikes.	pp. 1-2
Connecticut State Council of Machinists	12/11/2012	General	CT must still find ways to invest in CT-manufactured renewables, including, but not limited to, in-state industry sectors for fuel cells and hydrogen.	p. 1
Connecticut State Council of Machinists	12/11/2012	Other Electricity Sector Comments	Funding, especially for innovative new technologies and start-ups interested in basing in CT, needs to be increased. If budget shortfalls restrain funding, State must do better in marshaling angel investment funds and connecting those funds to innovators.	pp. 1-2
Connecticut State Council of Machinists	12/11/2012	Other Electricity Sector Comments	Some resources of AG's Office should be dedicated to providing limited advice/counsel, on subject of international patenting, to start-ups and innovators (especially those in the energy sector). Patenting is a complex and a costly aspect of introducing new tech; CT would get return on investment if State helped facilitate successful navigation of patenting system.	p. 2

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Stakeholders	**Date Filed**	**Main Topic**	**Specific Issue**	**Page Cite**
CT Thermal-Renewable Energy Coalition	12/21/2012	RPS	A number of states have included or assessing the use of non-electric thermal energy resources as part of their RPS. Applications such as biomass based heating and cooling utilizing wood pellets, biodiesel blended with heating oil, or biogas from anaerobic digestion and landfill gas capture projects, as well as solar water-heating and geothermal heating and cooling are well-recognized for their environmental impacts and significantly lowering GHG emissions. If CT were to adopt a similar provision by incorporating RECs from these applications as Class I Resources under the RPS, the potential benefits beyond the environmental considerations would include: (1) increased support for in-state resources with no new funding required; (2) a reduction in ratepayer expenditures for RPS compliance; and (3) more efficient utilization of fuels that are already eligible under existing RPS guidelines.	pp. 1-2
CT Thermal-Renewable Energy Coalition	12/21/2012	RPS	The concept on non-electric thermal RECs has been accepted in both the Federal Executive Order on RE as well as fifteen state level RPS programs. Both MD and NH enacted legislation in 2012 designating thermal RECs as Class I resources from specific in-state resources such as poultry litter and wood pellets, and MA will be releasing the results of their study of thermal RECs by the end of this year. Currently each state has considered its own methodology to determine the allocation of such RECs, though last December the EPA delegated to ASTM and the International Association of Plumbing and Mechanical Officers the task of establishing a formal standard "to both credibly and accurately measure the environmental, energy, and financial benefits generated by clean heating and cooling technologies." CT has the opportunity to participate in these discussions and help establish what more than likely will serve as national standards by immediately including the benefits of these widely acknowledged applications into our existing RPS.	p. 2

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Stakeholders	**Date Filed**	**Main Topic**	**Specific Issue**	**Page Cite**
Connecticut Water Company	12/13/2012	Virtual Net Metering	Strongly supports expansion of virtual net metering to encourage more individual power generating projects. By doing so, the capital investment in fuel cell and similar tech becomes more economically viable by large volume, widely distributed energy consumers (such as water utility operations).	p. 3
Connecticut Water Company	12/13/2012	Reliability/Security	Encouraging more on-site generation projects, particularly at critical utility and municipal facilities, would provide greater reliability during a major storm event or power outage when commercial power is not available.	p. 3
Connecticut Water Company	12/13/2012	Decoupling/Rates	Decoupling and development of dynamic rates for electric users should be encouraged to align interests of the utilities, their customers, and the State's conservation goals. Electric utilities would then be in a better position to promote conservation and still realize PURA-approved revenues that are needed to their operations and capital investments.	p. 3
ConnPIRG, Clean Water Action, CT Citizens Action Group, Environment CT, Sierra Club CT Chapter, National Sierra Club, RENEW, Working Families Organization, Conservation Law Foundation, Inter-Religious Eco-Justice Network, 350 Connecticut	12/21/2012	GHG Emissions Reductions	The Draft CES often refers to GHGs but fails to evaluate how each policy will contribute to achieving the legislatively mandated targets for 2020 and 2050. Taking leadership on reducing GHG emissions is an essential step in CT setting a national precedent.	p. 2

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ConnPIRG, Clean Water Action, CT Citizens Action Group, Environment CT, Sierra Club CT Chapter, National Sierra Club, RENEW, Working Families Organization, Conservation Law Foundation, Inter-Religious Eco-Justice Network, 350 Connecticut	12/21/2012	RPS	CT must make a stronger commitment to renewable energy and speed the transition away from fossil fuels. CT must preserve the integrity of the RPS and not expand Class I to include WTE and Canadian Hydro. CT should make use of long-term REC and PPAs to build renewable energy projects in CT and across NE at stable prices.	p. 2
ConnPIRG, Clean Water Action, CT Citizens Action Group, Environment CT, Sierra Club CT Chapter, National Sierra Club, RENEW, Working Families Organization, Conservation Law Foundation, Inter-Religious Eco-Justice Network, 350 Connecticut	12/21/2012	Microgrids	Strongly encourage the expansion of the microgrid program beyond the initial $15 million pilot program to speed the transition to a more reliable energy grid. DEEP should investigate the best practices for renewable energy and storage for both microgrids and individual users.	p. 2
Conservation Law Foundation	11/15/2012	RPS/Hydro	Large-scale hydropower does not need special financial incentives that are associated with the RPS. They are a viable technology and there is no justification for funneling CT ratepayer funds to Canadian utilities. If incentives are to go to Canadian hydro, it would dilute the RPS's recognition of in-state and in-region renewables. DEEP should take a much harder look than it already has at Canadian hydro's environmental attributes. There should be a much greater scrutiny of GHG emissions claims associated with Canadian hydro.	

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Stakeholders	**Date Filed**	**Main Topic**	**Specific Issue**	**Page Cite**
Conservation Law Foundation	11/15/2012	RPS/Hydro	There have been a number of elective transmission proposals designed to increase hydropower imports into the region. It's imperative that CT does not establish a policy direction that encourages development of these proposals in a way that is contrary to the wishes and the community decisions in other New England states.	
Conservation Law Foundation	12/21/2012	RGGI	A more aggressive emissions cap is needed to attain the RGGI goals.	p. 6
Conservation Law Foundation	12/21/2012	RPS/Hydro	All environmental costs should be included in determining whether to import Canadian hydropower to meet RPS goals. Include the same Synapse Report on Canadian Hydro assessment as Sierra Club.	p. 7
Conservation Law Foundation	12/21/2012	Procurements	Long term contracts provide a means to garner the benefits of new renewable resource deployment at lower cost and meet CT's 2020 RPS goals.	p. 10
Covanta Energy	12/21/2012	RPS/WTE	WTE will help meet several of goals outlined by draft CES, specifically increasing in-state renewable generation. WTE facilities produce renewable energy near the areas of demand (avoiding significant costs of new transmission liens), increase economic activity, create high paying CT jobs and will reduce energy costs and land use. WTE is recognized internationally by climate scientists as a reducer of GHG emissions.	p. 1
Covanta Energy	12/21/2012	RPS/WTE	Because of its investment in WTE, CT is the #1 state in nation for sustainable solid waste policy. Accounting for recycling, composting and WTE, CT diverts over 92% of its municipal solid waste from landfills, an impressive figure on par with advanced European nations. It is important that the CES recognize that WTE, while providing many environmental benefits to State's handling of solid waste, is also a critical component of State's energy future.	p. 1

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Stakeholders	**Date Filed**	**Main Topic**	**Specific Issue**	**Page Cite**
Covanta Energy	12/21/2012	RPS/WTE	Nationally, each ton of waste processed at an WTE facility leads to a reduction of a ton of CO2 equivalent GHG emissions. Based on these averages, Covanta's 3 WTE facilities in CT avoid approx. 640,000 tons of GHG emissions each year, predominately due to prevention of landfill methane a GHG 25x as potent as CO2 over a 100-year time frame. Concurrently, WTE supplies base load renewable energy to the grid, avoiding fossil fuel combustion. Further, the WTE process recovers ferrous and non-ferrous metals, reducing the GHG emissions associated with the production of these metals from raw materials.	p. 2
Covanta Energy	12/21/2012	RPS/WTE	WTE is one of lowest cost renewable energy sources. Further when the Energy Information Administration Office of Coal, Nuclear, Electric, and Alternate Fuels examined subsidies received by all energy technologies, it is clear that WTE is the least subsidized, receiving even less than fossil fuels. (Covanta appended an Attachment A to its comments that provides a comparison of subsidies.)	p. 2
Covanta Energy	12/21/2012	RPS/WTE	WTE facilities, through an engineered controlled combustion process, eliminate all of potential methane from waste disposal in landfills. Recognition of WTE as a source of GHG mitigation and inclusion of WTE as an eligible source of carbon offsets follows the long established policies of the Intergovernmental Panel on Climate Change (IPCC), the clean Development Mechanism (CDM) of the Kyoto Protocol and the European Union.	p. 3
Covanta Energy	12/21/2012	RPS/WTE	Covanta is introducing a new technology that it is installing at its WTE facilities. Results of this technology have further reduced nitrogen oxide emissions dramatically. As a result of these and numerous other technological emission control improvements over the years, modern WTE facilities run about as clean as a NG facility.	p. 4

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Covanta Energy	12/21/2012	RPS/WTE	Readily available data demonstrates domestically and internationally that communities that utilize WTE have much higher recycling rates when compared to those that landfill. As the rate of landfilling in the US increased, the recycling rate went down, proving that it is the availability of cheap, state subsidized landfilling that competes with recycling, not WTE. Further, WTE facilities recover tons of ferrous and non-ferrous metals that would otherwise sit in a landfill, reducing GHG emissions associated with the production of these metals from raw materials.	p. 4
Element Markets	11/15/2012	RPS	Energy efficiency is the first renewable resource. It is important to have this in RPS. Funding for energy efficiency should increase in RPS.	
Element Markets	11/15/2012	RPS/Geothermal	Thermal renewable energy should be included in RPS (NH and MD have recently done so). These are not necessarily electricity generating units, but do offset fossil fuel use. CT should look into programs and studies on thermal renewable energy.	
Element Markets	11/15/2012	RPS	Level of oversight of RPS needs to be addressed. Currently, the market is not being scrutinized as it should be in terms of market behavior. Trading practices of RPS market needs to be policed.	
Environment CT	12/19/2012	General	In order to meet CT's environmental objectives, it is critical to have a strong commitment to ramping up clean, renewable energy sources.	p. 2
Environment CT	12/19/2012	TOU/RGGI/Net Metering	They support net metering, TOU pricing and strengthening RGGI.	p. 2
Environment CT	12/19/2012	GHG Emissions Reductions	CES fails to articulate a clear commitment and roadmap to actually reach CT's RPS goal. With 8 years left to reach the goal, the CES falls short of doing anything but redefine (albeit misguidedly) renewable energy.	p. 3

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Stakeholders	**Date Filed**	**Main Topic**	**Specific Issue**	**Page Cite**
Environment CT	12/19/2012	RPS/Hydro/Fuel Cells	Integrity of RPS is compromised with inclusion of fuel cells as Class I renewables. RPS is further weakened by inclusion of large-scale hydropower. Damming major waterways has catastrophic consequences on our rivers, the lands of the watershed, and all wildlife that depend on the ecosystem for survival. Hydropower from Canada will not be cheap for CT if we must build the transmission infrastructure. The Canadian gov't is already supporting the project's development, rendering our investment unnecessary. That funding should be invested in in-state and regional renewable energy projects.	p. 3
Environment CT	12/19/2012	RPS/WTE	Strongly oppose inclusion of incineration as a Class I renewable. As the Draft CES says on page 107, the economics of waste-to-energy facilities are currently unfavorable and will only continue to become less favorable as the state improves its reuse, reduction, and recycling efforts.	p. 3
Environment CT	12/19/2012	Munis/Soft Costs/Solar	CT solar programs have great potential for growth. There are likely improvements that can be made to CT solar programs. For example, town mayors should have option to exempt solar projects from property taxes if it is in the public's best interest. On commercial scale, CT should pursue long-term contracts with renewable energy developers in the region. This will give developers the stability they need to develop clean energy projects, give consumers the assurance of long-term price stability, and enable CT to advance the carbon emissions re-education mandated by 2008 GWSA.	p. 3
Environment CT	12/19/2012	GHG Emissions Reductions	DEEP and the CES should take a holistic approach to the RPS and the targets in the GWSA. All the programs proposed in draft CES should be evaluated based on how they contribute both to meeting our renewable energy goals and our carbon emission reduction mandates. At best, the CES can and should be a roadmap for CT to achieve these goals, with concrete strategies and interim benchmarks clearly detailed. Such a CES will elevate CT's status as a leader in protecting the region's environment and securing our clean energy future.	pp. 3-4

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Environment Northeast	12/21/2012	GHG Emissions Reductions	CES needs to incorporate five analytical approaches: (1) perform an apples-to-apples cost-benefit analysis for all fuel and non-fuel options; (2) identify long-range planning risks (CES does not do this risk identification); (3) synchronize with GHG emissions targets (final CES should attempt to estimate potential GHG emissions reductions for each sectorial strategy over time and then compare those reductions against CT's statutorily-mandated target of an 80% reduction by 2050; draft CES only does this for transportation sector; it must apply this to all sectors); (4) analyze life cycle GHG emissions (CES should compare fuels base on their life-cycle GHG emissions; this is a crucial consideration when comparing natural gas to other energy resources, esp. energy efficiency and renewables; fugitive methane gas emissions from natural gas production must be considered); (5) clearly identify formal recommendations (at times, draft CES makes proposals in the text of each chapter that are not referenced in the chapter recommendations).	
Environment Northeast	12/21/2012	Dynamic Pricing	The positive consequences of full investment in all cost effective energy efficiency should be recognized by draft CES. DEEP should engage in more technical and economic analysis, perhaps in combination with a stakeholder working group to determine the most cost-effective policy course. Recent studies and evaluations have found that dynamic pricing pilots and programs can generally achieve peak load reductions. The impact varies by the customer mix, price differential, weather, use of technology, and category of dynamic pricing offered. Customer participation rates need to be much higher (around 10%) than they currently are for benefits to be realized. The longest running programs (e.g., Illinois) have participation rates of 1% or less.	

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Environment Northeast	1(12/21/12)	Decoupling	ENE agrees with the recommendation to implement full decoupling for electric and gas utilities. CES should recommend legislation to require PURA to fully decouple all electric and gas utilities by a date certain (end of 2013 seems feasible). This mandatory approach has been used in Rhode Island. Reform is needed because CT's current statutory provision has two key flaws: (1) it allows for something less than full decoupling; and (2) it ties decoupling to rate proceedings which happen at irregular intervals. CL&P will not be in for a rate case for several years and will not be decoupled during a crucial time.	
Environment Northeast	12/21/2012	RGGI	It is important for CT to play leadership role in RGGI program review. Connecticut should push for approval of the lowest cap proposed by the program review.	
Environment Northeast	12/21/2012	Procurements	CES should conduct a technical, legal and economic analysis regarding the potential for CT to engage, singly or with other states, in regional renewables procurement utilizing long-term contracts. DEEP should increase its engagement in the NESCOE Coordinated Competitive Renewable Power Procurement effort. CT can also play a more active role in procuring regional renewables directly.	
Environment Northeast	12/21/2012	RPS	In advance of the RPS study, ENE recommends that any RPS reforms proposed should avoid undermining this fundamental policy purpose. Accordingly, large hydropower should not be included in RPS and should not receive ratepayer support. ENE wants full analysis of all options for supporting in-region renewables development for true emerging technologies.	
Environment Northeast	12/21/2012	FERC	CT should work with ISO to ensure that alternatives to wire transmission are considered so wires are the last resort. CT should compensate non-transmission alternatives in a manner that encourages their development and parallels what is available for wires transmission investments. CT should also monitor ISO-NE's Regional System Plan process for compliance with FERC's Order No. 1000 policy encouraging the comparable treatment of non-transmission alternatives when considering wires construction.	

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Stakeholders	**Date Filed**	**Main Topic**	**Specific Issue**	**Page Cite**
Environment Northeast	12/21/2012	FERC	CT should work with ISO-NE in its planning process to ensure that all benefits of EE are realized and investments are evaluated to determine if they defer the need for transmission investments. CT should also work with ISO ensure that DG and other distribution or local transmission investments in generation, energy efficiency, demand response and microgrids are evaluated for their role in deferring transmission investments.	
Environment Northeast	12/21/2012	FERC	CT should monitor NERC and FERC proceedings to ensure that the costs of complying with particular reliability standards do not exceed the system benefits.	
Environmental Energy Solutions	12/10/2012	Reliability/Security	CES should include a greater degree of robust security considerations, rather than scant, generalized and disconnected references. More in-depth, critical analyses are needed as less than a vigorous treatment of security issues not only could negatively impact the electric grid and liquid/gaseous fuels infrastructure but with it, the health and safety of CT citizens. There is no connecting thread that makes energy security an overarching priority.	p. 3
Environmental Energy Solutions	12/10/2012	Reliability/Security	While the Governor's investigation is named "The Two Storm Panel," the resulting report contained at lease two references to taking an "all hazards" approach. The draft CED did not consider other serious non-storm hazards associated with the delivery of electricity in any degree of detail. CES should present grid security in a more holistic, cross-cutting and a truly "all hazards" manner.	pp. 4-6
Environmental Energy Solutions	12/10/2012	Reliability/Security	Grid complexity is a potentially growing security issue. In looking at expanding the electric system, CES should be examining how addition of transmission capacity affects rest of system, and whether added redundancy makes the large, centralized system more resistant to failure.	pp. 6-7
Environmental Energy Solutions	12/10/2012	Reliability/Security/Cyber	An intentional cyber attack has potential to inflict great harm, possibly resulting in incapacitating the command, control and communications of the electric grid as well as most other aspects of our increasingly digital society.	p. 9

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Exelon Energy	11/15/2012	General	It is important to keep in mind that competitive markets are the core for achieving the goals of the CES, particularly on renewables, efficiency, and conservation. States that around the country, in places where markets were allowed to function properly, these elements did well, and conversely, where markets were stifled, these elements were weak.	
Exelon Energy	11/15/2012	General	As CT and the US moves towards a more distributed generation playing field, it is especially important to keep markets competitive.	
Exelon Energy	11/15/2012	RPS/Solar	Believes solar has the greatest potential in CT as an in-state renewable resource. Exelon commends DEEP for the things that they work on in the solarized zones in particular. Exelon thinks these actions have huge potential for increasing customer awareness, driving down customer acquisition cost, which is critical in the long run to continued solar uptake.	
Exelon Energy	11/15/2012	RPS/Hydro	DEEP should consider the impact that Canadian hydro would have on in-state renewable resources. If Canadian hydro is a path for CT, then CT should show equal support to resources developed closer to home. If Canadian hydro is used, the REC markets will suffer, hurting the potential to do in-state resources.	
Fairfield County Environmental Justice Network	12/13/2012	RPS/WTE	Opposes including trash incineration in the CES. Toxins released from trash incinerators are linked to cancer, asthma, diabetes and learning disabilities. The state can create more jobs from recycling and composting.	p. 1
Fairwind CT	12/14/2012	RPS/Wind	Fairwind urges reading the proposed wind turbine regs on CSC's website. Legislators on the Regs Review Committee should reject the proposed regulations until CSC can make further changes. Including the impact of siting of renewables (such as wind turbines) is critical to keeping CT a desirable place to live/work.	

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Fairvue Farms, LLC	11/20/2012	RPS/AD	CES does little to address rural production or uses of energy on a farm. Other states and countries have done more to diversify their energy and not make themselves as dependent on petroleum sources. For example, there are over 5000 anaerobic digestion facilities in Germany, VT has an AD program, and there are pilots in MA and NY. Farm energy and food production should be one of the priorities of a cleaner, cheaper, and more reliable energy supply for CT.	p. 1
Fairvue Farms, LLC	11/20/2012	Virtual Net Metering	Farms need to be able to have virtual net metering.	p. 1
Fairvue Farms, LLC	11/20/2012	RPS/AD	Anaerobic digestion needs to be considered a Class I renewable. CT needs to make AD qualify for programs that clean the environment.	p. 1
Fairvue Farms, LLC	11/20/2012	Procurements	There needs to be long term power purchase agreements to allow anaerobic digesters to be built and for cash flow. AD facilities should be considered in the general security of CT.	p. 1
Fairvue Farms, LLC	11/20/2012	Microgrids	The development of microgrids on farms and in rural areas would help secure a food supply in times of natural and other disasters.	p. 1
Fairvue Farms, LLC	11/20/2012	RPS/AD	Anaerobic digesters would help the dairy industry be better neighbors, by removing much of the offensive smells from manure, and giving a source of enviro-friendly nutrients that is better for crops. ADs would also allow dairies to have a bedding material for cattle that would be pathogen-free. If allowed to receive food waste, farms could solve some of CT's waste problems as well.	p. 1
Fairvue Farms, LLC	11/20/2012	RPS/AD	Although CT has an anaerobic digester pilot program, it is so restricted that nobody is interested in applying. Would like to see this fixed.	p. 1
First Wind	12/14/2012	RPS/Wind	Wind is definitely a part of "cleaner and cheaper." A competitive process to procure long-term contracts for clean and renewable energy is the best method to pursue the CES's electricity objectives.	

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Stakeholders	**Date Filed**	**Main Topic**	**Specific Issue**	**Page Cite**
First Wind	12/14/2012	RPS	A 2011 Massachusetts report estimated the energy price suppression benefits of new renewable generation as far exceeding the cost of RPS compliance. It also led MA to expand use of competitive PPAs for renewables as estimates showed that approx. $1 billion could be saved. In addition, long term contracts for PPAs for RPS eligible renewables are the single most effective means of driving future investment in eligible generation to ensure that sufficient supplies will be available in the region to meet the targets of CT and other New England states. More supply will mean lower REC prices and increasing investment in eligible renewables which would help address the REC shortage predicted for 2018.	
First Wind	12/14/2012	RPS	DEEP should commit to rigorous and open competition so that the process rewards those offering best deal for consumers. The process should encourage innovation and seek approaches that address multiple objectives within the Strategy. For example, proposals could be submitted with a mix of clean technologies that together bring more benefits than one technology alone. An example like wind and hydro together could secure PPAs that provide consumer savings, rate stability and enhanced reliability.	
First Wind	12/14/2012	RPS	In terms of the Canadian hydro question, DEEP should conduct a competitive process open to proposals of all sorts. Longer term contracts will bring greater price benefits.	
First Wind	12/14/2012	RPS	The dilution of RPS Class I would be unnecessary and counterproductive. The REC market tends to be highly responsive to subtle changes in RPS policy. Major changes would bring large amounts of new REC supply into the market, diluting it to little or no value. Both the costs and benefits of the RPS should be considered as the program is studied. More broadly, DEEP should focus on driving down RPS compliance cost by seeking long term contract proposals that will provide significant amounts of cheaper Class I resources without weakening the RPS program.	

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Garden Club of New Haven / New Haven Urban Resources Initiative	12/14/2012	Reliability/Security	Draft CES does not set forth long range plan for placing electric distribution lines underground to max extent possible in order to achieve max reliability. CES should provide for gradual conversion where geographically feasible and in order of cost effective impact on reliability, thereby increasingly reduce and eventually eliminate economic losses to businesses/residents caused by major storms.	p. 1
Garden Club of New Haven / New Haven Urban Resources Initiative	12/14/2012	Reliability/Security	Conversion from primarily overhead distribution system to underground would also protect the roadside forest (which provides environmental, social, health and economic benefits) by making potentially harmful and unattractive pruning of healthy trees unnecessary and allowing wider range of tree species to grow along the roads.	p. 1
Garden Club of New Haven / New Haven Urban Resources Initiative	12/14/2012	Reliability/Security/ Undergrounding	Believes that stated $11M/mile cost of undergrounding is a typo, since $1M is often cited as average cost. Moreover, a 2009 study be Edison Electric Institute reports that the cost to do so ranges from $80K/mile in rural areas to $2.13M/mile in urban areas.	p. 2
Garden Club of New Haven / New Haven Urban Resources Initiative	12/14/2012	Reliability/Security	Since undergrounding is a long-term process and the costs would occur over a long time period, GCNH/NHURI argue that there is no certainty that rates would rise as much as draft CES stated, nor is it certain that ratepayers would object to paying a surcharge to support undergrounding in order to achieve more reliable power. It is unclear that undergrounding costs need to be entirely rates-funded. Given benefits of reliable supply, and negative consequences of power failure, GCNH/NHURI believe other financing mechanisms should be explored.	p. 2
Garden Club of New Haven / New Haven Urban Resources Initiative	12/14/2012	Reliability/Security	There is a high probability that major storms will occur more frequently than in the past as a result of climate change, and that frequency/severity are likely to increase as years go on. Moreover, more than any other time in our history, there is more dependency on electricity and the communications tech that it supports.	p. 3

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Garden Club of New Haven / New Haven Urban Resources Initiative	12/14/2012	Reliability/Security	Acknowledges there is no choice but to rely, in short-term, on properly conducted tree trimming/removal as recommended in SVMTF Final Report to reduce outages. However, this approach is unlikely to achieve level of reliability required by our modern economy and way of life.	p. 3
Garden Club of New Haven / New Haven Urban Resources Initiative	12/14/2012	Reliability/Security	It is insufficient to only consider the direct storm-related costs to the utilities; must also consider costs related to disruption of normal life to both businesses and individual citizens, such as lost business income, lost wages, damage to homes from failure of sump pumps, lost food, and harm to personal health.	p. 3
Harvest Power, Inc.	12/14/2012	RPS/AD	CT Legislature has recently expressed support for both the growth of organics recycling and for development of anaerobic digestion capacity. Under PA 11-27, CT established a mandatory statewide food scrap diversion program. In PA 11-80, Section 103 (b), CEFIA is directed to establish a pilot grant program to encourage development of anaerobic digestion. Both were consistent with the CT State Solid Waste Management Plan (amended Dec 2006). Despite this, there has been no AD capacity added in CT in the past several years. The lack of fully consistent and integrated policy framework across both energy and environment (solid waste) has hindered new investment in this sector.	pp. 1-2
Harvest Power, Inc.	12/14/2012	RPS/AD	Anaerobic digestion should be added to the legislative definition of Class I renewable energy sources. This omission discourages the development of AD projects by creating uncertainty whether such projects will qualify and imposing legal and administrative costs to secure a qualification decision. Support for this classification is found in PA 07-242 § 15, PA 11-80 § 103. Amend Ch. 227 § 16-1(a)(26) as follows: "Class I renewable energy source" means (a), energy derived from solar power, wind power, a fuel cell, methane gas from landfills, anaerobic digestion, ocean thermal power..." (further they cite to PURA dockets that have classified AD as Class I, and other state's classification designations).	pp. 2-3

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Stakeholders	**Date Filed**	**Main Topic**	**Specific Issue**	**Page Cite**
Harvest Power, Inc.	12/14/2012	RPS/AD	CEFIA grants for anaerobic digestion should be revamped and expanded. The program in place is flawed and has failed to produce results. No applications to the pilot program were submitted. For an anaerobic digestion project to qualify for the pilot program, there should be no on-site requirement. It could reasonably be inferred that this as a policy priority of the Legislature in passing PA 11-217. Amend PA 11-80 § 103 (b) as follows: ...by using organic waste with on site anaerobic digestion facilities to generate electricity and heat.	pp. 4-5
Harvest Power, Inc.	12/14/2012	RPS/AD	The AD grant program by CEFIA included a variety of provisions that discouraged applications: (1) required all projects be 'ready for deployment,' to have all agreements in place, and prohibiting subsequent cost revisions, is unrealistic within the limited time frame of the application deadline [This should be made more flexible]; (2) funding timelines in the RFP are inconsistent and unfavorable to development of RE projects. The capital intensive nature of the RE facilities requires funding streams longer than the 10-15 year program terms, and well beyond the 6 years allowed for PPAs [Rules should be amended to allow long-term loans and PPAs of up to 20 years. Terms of longer than 20 years should also be proposed, to help mitigate the risk to developers of capital intensive RE projects].	pp. 5-6

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Stakeholders	**Date Filed**	**Main Topic**	**Specific Issue**	**Page Cite**
Harvest Power, Inc.	12/14/2012	RPS/AD	Amend and clarify organic materials recycling under PA 11-217. The statute is unclear in several respects, which could hinder implementation. Issues: (1) § 3(a) of the statute may be interpreted to mean that the compliance triggering event is establishing service of at least 2 composting facilities that have the capacity to service the needs of all businesses subject to the statute [Solution: Require DEEP Commissioner to make a formal determination that adequate capacity exists to trigger applicability of the statute]; (2) § 3(a) of the statute requires that upon the compliance triggering event, all covered business must separate organic materials at the source and recycle them at an organic material composting facility that is not more than 20 miles away [Solution: Require compliance by businesses subject to the statute only if (1) they meet the average projected volume threshold of not less than 104 tons/yr. of source-separated organic materials, and (2) they are located not more than 20 miles from a permitted source-separated organic materials composing facility]; (3) § 3(b) indicates that a generator that performs source separation of organic materials is deems in compliance of the statute.	pp. 6-7
Harvest Power, Inc.	12/14/2012	RPS/AD	There is no provision for enforcement of source separation, or of reporting on the amount and type of source separated materials sent to the composting facilities. To be economically viable, organic material composting facilities require long-term sufficient and consistent inputs from generators. Thus, a reporting and monitoring mechanism is necessary to govern participation and compliance by organic material generators.	pp. 6-7

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Harvest Power, Inc.	12/14/2012	RPS/AD	Adjust REC program to allow anaerobic digestion [Solution: 1) Amend Ch. 227 § 16-1(a)(26) as follows: "Class I RE source means (A), energy derived from solar power, wind power, a fuel cell, methane gas from landfills, anaerobic digestion, ocean thermal power..."; 2) Amend P.A. 11-80 § 110(a) as follows:...and use Class I technologies that have no emissions of no more than 3.0 pounds per MWh of nitrogen oxides, 8.8 pounds per MWh of carbon monoxide, 0.02 pounds per MWh of volatile organic compounds, and one grain per 100 standard cubic feet.	p. 8
Harvest Power, Inc.	12/14/2012	RPS/AD	Include Anaerobic Digestion as an eligible technology for energy improvement districts [solution: Amend Ch. 277 § 16-1(40) as follows: "Customer-side distributed resources" means (a) the generation of electricity …including, but not limited to, fuel cells, photovoltaic systems, small wind turbines, anaerobic digestion facilities, or...".	p. 8
Harvest Power, Inc.	12/14/2012	RPS	Adopt other policies that will generally support development of renewables.	p. 10
Harvest Power, Inc.	12/14/2012	Virtual Net Metering	The virtual net metering program should be revised and expanded. HP supports changes that would: (1) base program size on percentage of IOU load rather than dollar value; (2) extend availability to private as well as public customers; (3) provide flexibility to allow private ownership of assets that serve public customers; and (4) consistently provide for netting at the retail price.	p. 11
Harvest Power, Inc.	12/14/2012	Procurements	Long-term (20-year) contracting for renewable electricity should be allowed.	p. 11
Housatonic Environmental Action League, Inc.	12/14/2012	Smart Grids/Meters/TOU	HEAL opposes smart meters/grids and TOU pricing. The proposed smart grid system is nothing more than another green washed Wall Street model, with an inevitable huge transfer of taxpayer dollars into the coffers of multinational corporations. Installation of smart meters for every electric meter will result in a total radio frequency (RF) public health disaster, as it will turn every appliance into the equivalent of a 2-way transmitting cell phone. Higher mid-day electric rates will unfairly burden the elderly and others who are homebound.	p. 1

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Housatonic Environmental Action League, Inc.	12/14/2012	Other Electricity Sector Comments	Gov. Malloy should be absolutely certain that DEEP Commissioner Esty's participation in CES does not constitute a conflict of interest relative to Esty's private business interests. Commissioner Esty has recused himself from all DEEP matters relating to Housatonic River EPA Superfund site due to his private business relationship with GE.	p. 1
H. Q. Energy Services Inc. (subsidiary of Hydro-Quebec)	11/15/2012	RPS/Hydro	HQES is the US subsidiary of Hydro-Quebec, and would like to increase their trading relationship with New England and CT. HQES commends the State for its work to develop the Draft CES. HQUS is grateful for recognition of Canadian hydro as a renewable resource, and appreciate its inclusion in the CES.	
H. Q. Energy Services Inc. (subsidiary of Hydro-Quebec)	11/15/2012	RPS/Hydro	They would like to make clear the beneficial performance characteristics of Canadian hydro as a resource base (defines installed and planned capacity, environmental benefits, emissions, reliability, storage capacity, and reliability). Describes the four major challenges with New England's power system and how Hydro Quebec can be part of their solution.	
H. Q. Energy Services Inc. (subsidiary of Hydro-Quebec)	12/20/2012	RPS/Hydro	CT should recognize Hydro-Quebec hydro as a renewable resource. CT should consider how Canadian hydro might contribute to achieving renewable objectives, as well as other important energy and economic goals.	p. 1
H. Q. Energy Services Inc. (subsidiary of Hydro-Quebec)	12/20/2012	RPS/Hydro	Hydro-Quebec has unique ability to develop large, highly efficient hydroelectric generating plants that produce large quantities of energy. Province of Quebec is very large and has significant quantities of water, including many fast-moving rivers, which have allowed for design/construction of large, site-specific facilities that make highly efficient use of the amount and movement of water in certain locations. Additionally, certain Hydro-Quebec facilities have been designed to produce power several times from the same water source.	p. 2

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Stakeholders	**Date Filed**	**Main Topic**	**Specific Issue**	**Page Cite**
H. Q. Energy Services Inc. (subsidiary of Hydro-Quebec)	12/20/2012	RPS/Hydro	Hydro-Quebec has ability to compete with a diverse set of resources to deliver electric market products throughout Northeast markets. HQ believes that if allowed to compete with other resources to assist state in achieving RPS objectives, based on price and performance, if even on a limited basis, it would become clear to gov't and industry stakeholders that delivery of HQ's hydropower is a cost-effective renewable resource for meeting current renewable goals -- and provides an option for putting state and region on path towards even greater use of renewable power to meet growing energy needs and challenges.	p. 2
H. Q. Energy Services Inc. (U.S. subsidiary of Hydro-Quebec)	12/20/2012	RPS/Hydro	HQ's long-term contract for energy and renewable attributes with state of Vermont is evidence of its cost-effectiveness that can be further demonstrated through a solicitation for renewable resources that allows for the eligibility of a broader set of resources (as contemplated by draft CES) and includes the cost of any new transmission needed to deliver remote renewable resources to load centers.	pp. 2-3
H. Q. Energy Services Inc. (U.S. subsidiary of Hydro-Quebec)	12/20/2012	RPS/Hydro	Industry indicators (such as the attrition rate of renewables in ISO-NE's interconnection queue), for a variety of complex reasons (including market conditions), suggest that regional renewable development has slowed and does not appear to be moving at rate that expected to meet state goals or make a significant contribution to expected capacity needs in next 4-6 years. HQUS believes it is fair to conclude that most of available cost-effective resources in region have been exhausted and region is now facing development of increasingly expensive renewable resources, due in large part to the need for substantial new transmission infrastructure to integrate wind power projects and deliver output to load centers.	p. 3

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H. Q. Energy Services Inc. (U.S. subsidiary of Hydro-Quebec)	12/20/2012	RPS/Hydro	Current situation has given rise to new phase of renewable development that requires careful consideration of the types of policies/mechanisms (e.g., NESCOE's review of how coordinated renewable procurement might serve to pool renewable buying power of the state; use of state-required, utility-specific solicitations to award long-term contracts for renewable resources) that are needed to ensure development of region's most cost-effective resources. Also, regional resource developers are seeking partnerships with transmission developers to present an all-in delivered cost of renewable energy -- and the clean energy sector has determined that new financing options and extended incentives are a priority for continued development.	p. 3
H. Q. Energy Services Inc. (U.S. subsidiary of Hydro-Quebec)	12/20/2012	RPS/Hydro	HQUS requests that CT (and other NE states) give some consideration to how Canadian hydropower might contribute to renewable, and other important energy supply objectives, including how HQ's commitment to fund major transmission upgrades for additional renewable power delivery into the region might be part of the evaluation.	p. 3
H. Q. Energy Services Inc. (U.S. subsidiary of Hydro-Quebec)	12/20/2012	RPS/Hydro	HQ hydropower is one of the cleanest electric generating options. Solar power, generated via PV panels, emits 4x more GHGs, and a NG-fired power plant produces 40x more GHGs than a hydropower plant. Certain studies that HQUS cite, when taken together, conclude that the emissions from generation of hydropower are mainly derived from 3 sources: the construction of dams, generating stations and transmission lines; the decomposition of organic matter in reservoirs; and, the loss of natural carbon sinks caused by the flooding of forests during reservoir creation. In northern regions such as Quebec, these emissions spread over the service life of a generating station, are equivalent to the emissions of a wind power facility.	pp. 3-4

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H. Q. Energy Services Inc. (U.S. subsidiary of Hydro-Quebec)	12/20/2012	RPS/Hydro	HQ hydropower is highly reliable due to: (1) HQ achieves high availability and deliverability rates because it is backed by HQ's entire fleet of installed and contracted capacity of 41,000 MW, receives continuous investment in maintaining a robust transmission system and efficient generating fleet, has approx. 6,000 MW of transfer capability into 4 North American export markets over 17 interconnection points, and can store approx. 175 TW hours of energy; (2) HQ's system of reservoir-based hydropower generation operates both as a base load and peaking source of electricity, and, as a result it is a perfect complement for contributing to reliable operations of the NE power system during the summer peak demand season; (3) energy security is a top priority as HQ closely manages a substantial energy reserve that it holds in a diverse set of reservoirs throughout the province; (4) current and future reliance on deliveries of HQ hydropower into NE serve to mitigate reliance on NG supplies and delivery systems, as well as oil and coal resources that are being called on today to ensure reliability when gas supplies are unavailable or uncertain; and (5) HQ has ability to serve as a firm capacity resource for region, given the level of uncertainty of significant quantities of existing capacity in NE and NY markets, increasing federal environmental regulations, and public concern about the operation of certain facilities.	pp. 6-7
H. Q. Energy Services Inc. (U.S. subsidiary of Hydro-Quebec)	12/20/2012	RPS/Hydro	HQ hydropower can help CT achieve its objectives in several important ways: (1) it is a cost-effective renewable resource that can be delivered to NE region over currently existing infrastructure; (2) it is a clean low-carbon resource that has lifecycle carbon emissions similar to wind facilities; (3) it is controllable, so it is capable of assisting region in balancing intermittent renewables like wind and solar; (4) it could help NE mitigate risks associated with increased reliance on NG; and (5) increased deliveries of HQ hydropower into region will require new infrastructure; allowing hydropower to assist state in achieving its renewable objectives is a way to advance this needed infrastructure.	p. 9

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Hydro Dynamic Engineering, LLC	11/27/2012	RPS/Geothermal	Definition of renewables should be expanded to include geothermal heat pumps. Such pumps fit definition of Class 1 renewables because of similarity to ocean thermal power, which is a listed Class 1 renewable in CT's RPS.	p. 1
Institute for Sustainable Energy	12/19/2012	Smart Grids/Meters/TOU	CES should recommend optional, more aggressive TOU rates that truly reflect real-time electric market costs. These rates would encourage flattening on-peak energy use and load management to reduce avoidable demand charges. An independent "Best Practices" study of utility rates, including UI's large customer seasonal TOU rate, would demonstrate that market-based pricing signals can be used to model a more efficient regional energy profile, lowering costs for manufacturers and reducing over-all rates. This opportunity became evident through observing the eager participation by industry in the ISO-NE Demand Response Program when the region was threatened with locational pricing penalties in 2008.	pp. 4-5
Institute for Sustainable Energy	12/19/2012	Microgrids/CHP	CES should encourage CHP & Microgrids. Customer-owned CHP can be twice as efficient as central plant electric generation. It also provides commercial and industrial consumers with efficient thermal energy and improved reliability. Customer-owned CHP can also form the distributed backbone for microgrids that provide essential services during natural disasters and power interruptions.	p. 6
Institute for Sustainable Energy	12/19/2012	Microgrids/CHP	The CES should encourage the development of programs that offer technical support, interconnection standards, incentives, financing and streamlined permitting for CHP. Nationally, 12% of the power supporting the grid is provided beyond the meter in the form of customer-owned generation, and is increasing as the benefits of on-site power generation become more evident. CT has less than 10% of its power capacity coming from CHP. PA 05-1 removed many of the barriers stifling CHP development in CT and provided a financial incentive which doubled the amount of CHP in CT by 2009. A similar program should be enacted to promote high efficiency CHP and microgrids.	

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Institute for Sustainable Energy	12/19/2012	RPS	Connecticut-based renewable energy systems should be preferred and encouraged over importing renewable energy through new transmission projects connecting us to Canada. In-state renewable energy projects provide additional benefits over imported renewable energy, including: development of local businesses, more in-state green jobs, improve local air quality, reduce GHG, reduce dependence on foreign oil and contribute to CT's economy.	p. 6
Institute for Sustainable Energy	12/19/2012	Smart Grids/Meters/TOU	ISE supports the installation of smart meters in order to provide consumers with real-time energy consumption data, permit a higher level of control, and the ability to reward consumers who modify their energy use behavior with lower cost power and lower energy bills. Smart meters would allow residential customers to elect TOU rates in order to further reduce their energy costs.	p. 6
Institute for Sustainable Energy	12/19/2012	Submetering	When a developer includes large Class I renewable energy systems within a multifamily or building complex, the owner should be allowed to permit the tenants to purchase the energy from that renewable energy system. This would require sub-metering of tenant spaces (tenants would receive a bill not exceeding the rate charged by the local distribution company for the energy generated and supplied by the renewable system). In these cases, the owner would be connected to the grid for power needs beyond the renewable energy system through a master meter and allowed to resell grid power (similar to how power is resold in campgrounds and marinas).	p. 6
Local 420 of the International Brotherhood of Electrical Workers	12/14/2012	General	In full support of the resolution for the CES. Believes it will bring multiple jobs for CT and continued employment of gas workers and help with CT's energy environment.	p. 1
Mitsubishi Electric	12/21/2012	RPS	Mitsubishi advocates for inclusion of their highly efficient ductless HVAC cooling and heating systems in the CES to help meet Connecticut's energy goals.	p. 1
Mitsubishi Electric	12/21/2012	Submetering	Submetering prohibitions should not be applied to distribution of heating and cooling refrigerant.	p. 3

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Stakeholders	**Date Filed**	**Main Topic**	**Specific Issue**	**Page Cite**
Mr. Electricity Energy Storage Systems LLC	11/20/2012	Smart Grid/Metering/TOU	Most energy waste happens during off peak. By storing the surplus we can use it the next day and close older dirty generators instead of refurbishing them to run on natural gas. You do not smart meters or smart grid - you need to replace meters with old fashioned dual clock meters now in storage.	p. 1
Nalcor Energy	undated	RPS/Hydro	Nalcor is a Canadian company with over 6,300MW of installed hydroelectric capacity. Nalcor is also developing two new hydro sites that will be online in 2017. By permitting new large hydro imports from Canada to qualify for a portion of RPS, these imports will compliment in-state and in-region and enable load serving entities to meet RPS obligations in a more cost effective manner by diversifying supply options. Another means to attract and enable financing of renewables is to facilitate utilities entering into long-term supply contracts for terms sufficient to support lower cost financing terms. This could be 15-20 year terms. This would also allow CT to meet its long term goals for renewable power and reduction of GHGs.	
Nanotech Plus LLC	12/13/2012	Reliability/Security	The additional energy in the atmosphere makes storms like Sandy more likely.	
Nanotech Plus LLC	12/13/2012	Reliability/Security	CT should prepare for shutdown of nuclear plants.	
Nanotech Plus LLC	12/13/2012	RPS	CT lacks steady hot sunlight and steady strong winds; its high population density, expensive land and tree density make renewables economically challenging.	
Nanotech Plus LLC	12/13/2012	Microgrids	Microgrids are a poor solution for CT. Urban microgrids require fuel cells which are difficult to retrofit. Microgrids do not have advantages over gas turbines unless the waste heat is utilized. The existing grid is showing its age - not its fundamental flaws.	
Nanotech Plus LLC	12/13/2012	FERC	There is a mismatch between FERC strategy and CT's needs.	
Nanotech Plus LLC	12/13/2012	Infrastructure	CT has a pressing need for more transmission lines to use Hydro Quebec's capacity or to provide a market for renewables in states west of CT.	
Nanotech Plus LLC	12/13/2012	Infrastructure	The requirement to use more efficient transmission technology is not addressed in the draft CES. CT should look at superconducting wire and electric pipe technology.	

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Nanotech Plus LLC	12/13/2012	Reliability/Security	The draft CES's most glaring omission is the damage done by Sandy and the economic losses due to lack of power.	
New England Clean Energy Council	11/15/2012	Virtual Net Metering	Supports the expansion of virtual net metering and the implementation of dynamic pricing, which will spur customer adoption of renewables and give them an opportunity to benefit from some self-generation.	
New England Clean Energy Council	11/15/2012	RPS/AD	Definitions of qualifying renewables should be expanded to explicitly include resources such as anaerobic digestion, making clear that they are part of what would classify as Class I.	
New England Clean Energy Council	11/15/2012	RPS/Hydro	Urge great caution in changing the RPS. Canadian hydro should not be part of RPS, though it does have a role to play in helping NE meet its GHG reduction goals. Canadian hydro, if introduced, will dilute the RPS, undermine the REC market, lower prices of RECs.	
New England Clean Energy Council	11/15/2012	Procurements	CT has a very good program for long-term contracts for RECS. NECEC urges that length of those contracts be extended from 15 to 20 years to reduce financing costs for developers, which will reduce costs to customers.	
New England Clean Energy Council	11/15/2012	Procurements	CT should consider long-term contracts not just for RECS, but also for the energy produced. In the current energy markets, that support can be very critical to ensuring the success of renewable energy development.	
New England Clean Energy Council	11/15/2012	Munis/Soft Costs	On renewables, NECEC commends efforts to remove obstacles to customers' adoption of renewables, including streamlining, permitting and siting. NECEC support these efforts and hope to export them from CT to other states.	

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New England Geothermal Professional Association	10/18/2012	RPS/Geothermal	NEGPA provided its recommendations for metering of geothermal RECs for the rulemaking process of New Hampshire Senate Bill 218. Per SB218, "Useful thermal energy" means renewable energy derived from Class I sources that can be metered and that is delivered in NH to an end user in the form of direct heat, steam, hot water or other thermal form for which fuel or electricity would otherwise be consumed. At this time, the recommendation is to meter thermal RECs for heating energy (positive BTUs) derived from the geothermal ground source. Measurement of heating energy is similar to methods used by the solar industry. Metering for cooling is not recommended at this time, but should be done in the future.	
New England Hydropower Company LLC	12/6/2012	Procurements	CT can play foundational role in providing financial certitude over short-term by offering State-guaranteed 15+ year power purchase agreements to new business developing and deploying technologies that forward the goal of generating 20% of CT electricity demand from renewable resources by 2020.	p. 3
New England Hydropower Company LLC	12/6/2012	Procurements	The State, as one of largest electric consumers, has ability to seek procurements for State-owned and operated buildings, hospitals and educational facilities. Such structure and focused procurements could successfully use existing market forces and competitive pressures to acquire long-term sources of renewable energy while simultaneously providing the financial assurance needed for small businesses to attract long-term investment.	p. 3
New England Hydropower Company LLC	12/6/2012	CEFIA	It is vital that CEFIA continue to receive and even expand the policy and financial support needed to achieve its mission and vision. Continued support should be affirmed for maintenance and, if necessary, expansion of funding through rate reduction bonds for direct disbursement to CEFIA, rather than to disbursement to General Fund, as offset to declining stranded cost payments and transition assessments.	pp. 3-4

Electricity Sector Comments				
Stakeholders	**Date Filed**	**Main Topic**	**Specific Issue**	**Page Cite**
New England Hydropower Company LLC	12/6/2012	RPS/Hydro	Small, run-of-river hydropower technology is currently commercially available, and, when sited thoughtfully, is economically viable. A conclusion that such hydropower technology is neither commercially available nor commercially viable, is erroneous and speaks to a perception problem and a need for greater outreach/education.	p. 4
New England Hydropower Company LLC	12/6/2012	RPS/Hydro	Overall efficiency of small, run-of-river hydropower technology cannot be duplicated by land-based wind or solar installations, both of which require significant land areas for siting in order to achieve efficiencies of scale. Small hydropower, with appropriate siting, using generation technology that is much less invasive or negative in scope and extent of environmental impacts, holds tremendous potential for CT.	p. 4
New England Hydropower Company LLC	12/6/2012	RPS/Hydro	DEEP's comprehensive approach for state permitting processes, while exemplary and unprecedented in New England, could benefit from two additional incentives: (1) harmonization of DEEP's hydropower permitting process with the federal licensing requirements, including environmental review and public participation; and (2) improvements to the process for leasing state-owned structures for private development, including: (a) the development of guidelines/roadmaps concerning the appropriate processes, agencies, and points of contact; (b) adoption of milestones and schedules for action, long with appropriate next steps; and (c) clear identification of physical documents, plans and archives, and some document centralization.	p. 6
New England Hydropower Company LLC	12/6/2012	RPS/Hydro	CES should consider adopting a more focused and directed approach to creating incentives for expanded development and strategic deployment of small hydropower projects. Small hydropower projects should be specifically targeted for promotion of greater DG through proposals to expand virtual net metering. Pilot projects should be designated in locations not subject to FERC's jurisdiction, and those locations should be used as test facilities for promoting small hydropower development.	p. 7

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Stakeholders	**Date Filed**	**Main Topic**	**Specific Issue**	**Page Cite**
New England Power Generators Association, Inc.	12/13/2012	Procurements	DEEP should exercise caution in use of PPAs to promote renewable resource development while also trying to keep electricity costs affordable for consumers. Although there are many reasons to promote and support development of renewable energy resources, they tend to be more costly than other electric generation technologies.	p. 2
New England Power Generators Association, Inc.	12/13/2012	Procurements	State-sponsored PPAs are not the best way to promote resource development at lowest cost/risk for consumers. Rather, properly designed electricity markets should provide the sufficient incentives for financing and development of all generation resources, including renewables. To the extent that these markets are not working accordingly, work should be pursued through ISO-NE, NEPOOL and FERC to effect these market improvements.	pp. 2-3
New England Power Generators Association, Inc.	12/13/2012	Procurements	If, after exhausting efforts to achieve market improvements to assure system reliability through wholesale markets, DEEP determines that these markets are not working as designed, and makes a policy decision that additional generation is necessary for system reliability or to mitigate the cost of renewable energy, it would be imperative that PPA recipients are selected through a competitive procurement process (one that is open, transparent and competitive, consistent with prior legislative acts).	p. 3
New England Power Generators Association, Inc.	12/13/2012	General	Fulfilling any need for generation -- now or in the future -- should include continuation of State actively working to support competitive whole electricity markets that provide opportunities for private investors to successfully finance projects and deliver electricity to CT consumers.	p. 4
New England Power Generators Association, Inc.	12/13/2012	RPS	For the upcoming RPS Study process, it is essential that stakeholders be afforded an opportunity to comment prior to completion of a draft report. The process should allow adequate time for meaningful stakeholder perspectives.	p. 5

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Stakeholders	**Date Filed**	**Main Topic**	**Specific Issue**	**Page Cite**
New England Power Generators Association, Inc.	12/13/2012	RPS/Hydro	Large-scale hydro projects should not be included as a RPS resource, nor should a new class be added to the RPS for the purpose of providing enhanced economic support to these resources. Eligibility for consumer subsidies through RECs should not be extended to energy sources that do not satisfy environmental and policy criteria, or that do not face the economic challenges of other renewable technologies.	p. 5
New England Power Generators Association, Inc.	12/13/2012	RPS/Hydro	Given large storage capacity and strong interties of Hydro-Quebec system with other, higher-emitting, jurisdictions, it is highly probable that a substantial portion of energy being delivered will have actually originated from fossil-fuel generating facilities from such neighboring jurisdictions. More generally, it is advisable that any eligible imports of renewable resources be unit tagged to help ensure RPS program's integrity.	p. 6
New England Power Generators Association, Inc.	12/13/2012	RPS/Hydro	Strongly recommends that a component of the analysis driving DEEP's final recommendation regarding the expansion of RPS-eligible resources, and whether to include this type of hydro facility, is an analysis of whether it is actually a low-cost resource.	p. 6
New England Power Generators Association, Inc.	12/13/2012	RPS/Hydro	Transmission projects that have been proposed over the last few years for the NE (Northern Pass Transmission, Champlain Hudson line, Northeast Energy Link) have experienced opposition and potential delays. CT policymakers should be mindful of this opposition and factor in the likelihood of these projects actually being built before making widespread significant changes to state policy and the RPS. Basing the CES on a project that is several years delayed and in peril is not sound policy.	pp. 7-8

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New England Power Generators Association, Inc.	12/13/2012	Taxes	Draft CES does not address the current electric generation production tax, which may have significant policy ramifications on CT consumers and the energy industry. This tax included a sunset provision guaranteeing the tax would be eliminated in 6/2013. NEGPA believes it is imperative that the sunset is allowed to proceed, as households and businesses should no longer bear a tax on the production of electric generation in CT that has increased costs by tens of millions of dollars. Existence of this tax makes CT's power more expensive than neighboring states and sends an anti-business message.	p. 8
North American Power and Gas, LLC	11/15/2012	RPS	They have concerns about the RPS market in CT, particularly its effect on CT's economy. CES overlooks an important concern from the perspective of the retail marketer and leaves an area of improvement for the supply of Class I renewable energy certificates.	
North American Power and Gas, LLC	11/15/2012	RPS	CT's RPS can stifle economic development in CT in two ways: (1) Rising costs of Class I RECs adds a significant premium to electricity supplied to ratepayers, including businesses; and (2) Program dynamics act as an anti-competitive force for CT's deregulated energy markets.	
North American Power and Gas, LLC	11/15/2012	RPS	Increased cost of Class I RECs is analogous to attacks on CT families. The additional REC fee in CT adds approximately 5/10 of a cent to 6/10 of a cent to the price of every kW of energy in CT, approximately $50-$60 per year for the average family. This is also bad for businesses, and may cause them to relocate elsewhere.	
North American Power and Gas, LLC	11/15/2012	RPS	The REC/RPS market is anti-competitive for smaller retail suppliers in the electricity markets. NAPG believes that CT capital is leaving the state.	
North American Power and Gas, LLC	11/15/2012	RPS	NAGP would like to see in the RPS market, more clarity, specificity, and prioritized goals for the CT RPS program.	
North American Power and Gas, LLC	11/15/2012	RPS	All entities should be required to report each REC transaction in the state in order to allow for more transparency.	
North American Power and Gas, LLC	11/15/2012	RPS	NAGP would like to see a three-year banking for all Class I RECs in CT.	

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Stakeholders	**Date Filed**	**Main Topic**	**Specific Issue**	**Page Cite**
North American Power and Gas, LLC	11/15/2012	RPS	CT should implement a program that would give smaller independent retail providers access to funding in order to purchase these RECs, because the high cost to such suppliers is anti-competitive in nature.	
North American Power and Gas, LLC	11/15/2012	RPS	Volatility of the Class I prices in CT has exceeded that of some of the other states and some of the other markets. Particularly from the point of view of the retail marketer, the ability to absorb volatility in these prices is uniquely different from the ability of an EDC. Higher REC prices or potentially higher REC prices translate to everyone's customer bill. Volatility of REC prices has become yet another element of risk management for companies.	
North American Power and Gas, LLC	12/13/2012	RPS	RPS could stifle economic development in CT in 2 ways: (1) rising cost of Class I RECs adds a significant premium to electricity supplied to ratepayers, including businesses; and (2) program dynamics act as an anticompetitive force for CT's deregulated energy market.	p. 2
North American Power and Gas, LLC	12/13/2012	RPS	To improve CT's RPS, NAPG recommends that it: (1) clarify, specify, quantify and prioritize its goals to ensure cohesion and transparency; (2) add additional technologies to the Class I definition to increase supply, particularly from the over-supplied Class III category; (3) expand the geography of states from which Class I credits may be sourced; (4) require all entities to report each CT REC buy/sell transaction, OTC and exchange traded, to the PURA in order to create transparency, monitor and prevent market manipulation; (5) allow 3-year banking on all RECs, particularly Class I, in order to avoid excessive and unnecessary price volatility; (6) allow CT independent retail suppliers access to subsidized lines of credit from CEFIA in order to establish favorable credit terms so they may compete on fair/equitable playing field in CT energy markets; and (7) anticipate/avoid financial impacts to consumers that could result from prospective changes to the RPS.	pp. 4-5
Northeast Clean Heat and Power Initiative	12/6/2012	Submetering/Net metering	A review of current sub metering and net metering laws is needed.	

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Northeast Clean Heat and Power Initiative	12/6/2012	Demand Charges	Structure of DG tariffs must change from monthly max demand to, at least, daily "as-used" demand charges. NY provides long standing precedent for this progressive DG tariff model. DEEP should have utilities provide data of how many customers have paid the full monthly max demand charges. Utility pricing of daily as-used demand should be set as daily per kW charge, pro-rated daily from the standard demand charge for that customer class.	
Northeast Utilities Association (CL&P and Yankee Gas)	12/21/2012	RPS	As State is approaching 10th RPS compliance year, it is now appropriate to build on the past 10 years, reevaluate the RPS program, and incorporate lessons learned based on experience and changing market conditions. CT's review of State's RPS and the cost/benefit of complying with the RPS is timely.	p. 7
Northeast Utilities Association (CL&P and Yankee Gas)	12/21/2012	RPS	As Class I RPS requirements increase over the balance of the decade, to a level of 20% by 2020, the State could continue to see its energy suppliers paying close to the ACP rate, or actually paying ACP due to an undersupply of RECs. Ultimately these costs are borne by CT customers.	pp. 7-8
Northeast Utilities Association (CL&P and Yankee Gas)	12/21/2012	RPS	With the expectation of continued low power prices, due to low NG prices, and the threat of the expiration of gov't tax credits for renewable projects, it will be challenging for renewable generation to be developed without significant State subsidization. At its current trajectory, the annual customer cost of complying with CT's existing Class I RPS requirements in 2020 could be in excess of $300 million. The State needs to consider ways to avoid this potential cost.	p. 8
Northeast Utilities Association (CL&P and Yankee Gas)	12/21/2012	RPS	CT needs to consider ways to avoid potential cost of complying with CT's Class I RPS requirements. While CL&P remains supportive to the continued build-out of low-cost renewables in the state and region, it is well accepted that RE development opportunities in CT are limited. As such, it is appropriate that DEEP and the State evaluate additional options to achieve RPS objectives.	p. 8

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Northeast Utilities Association (CL&P and Yankee Gas)	12/21/2012	RPS	CL&P is supportive of a DEEP review focused on cost effective options to meet the State's RE goals and whether the RPS targets are appropriate and are in agreement with DEEP's goals of promoting supply and delivery of reliable and affordable clean energy. To the extent new resources are considered, it should be clear that these resources will benefit CT's customers through displacement of fossil power generation, reducing regional carbon emissions, reducing the fuel dependence on natural gas for power generation, and lowering wholesale energy prices.	pp. 8-9
Northeast Utilities Association (CL&P and Yankee Gas)	12/21/2012	RPS	While supportive of a DEEP review that includes consideration for new deliveries from large scale hydropower in Canada, CL&P finds it unattractive for utilities and utilities' customers when other renewable developers increasingly seek long term contracts with utilities to secure financing. According to CL&P, that structure locks supply at a fixed price, often well above market prices, and could absorb credit capacity from the utility's balance sheet, increasing borrowing costs on the margin.	p. 9
Northeast Utilities Association (CL&P and Yankee Gas)	12/21/2012	RPS	CT has opportunity to tap into Canadian hydroelectric facilities that are available now or under development, through the development of new transmission infrastructure. A CT RPS market design, which acknowledges that RPS can not only enable new generation, but also support new, clean energy transmission infrastructure could, in this instance, provide for significant CT customer savings.	p. 9
Northeast Utilities Association (CL&P and Yankee Gas)	12/21/2012	RPS	There is limited reason to extend the financial benefits associated with renewable resources like wind and solar to hydroelectric facilities that are already being developed in Canada, in spite of current low market prices. However, the same is not true of new interconnections that enable that power to flow into New England.	p. 9

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Stakeholders	**Date Filed**	**Main Topic**	**Specific Issue**	**Page Cite**
Northeast Utilities Association (CL&P and Yankee Gas)	12/21/2012	RPS/Hydro	CT should create a new class of RECs for incremental hydroelectric supply that is delivered over a new transmission interconnection that has been built as an economic project (as opposed to a reliability-based one) which would supplant the need for meeting some portion of Class I RPS requirements. The % for this new class of incremental hydro-electric supply should be set at a level that considers the need to continue to promote development of new renewable resources in the region, while protecting CT customers from exorbitant ACP-driven prices. This kind of Class I RPS structure would have benefit of maintaining CT's robust RPS goals, promoting local and regional renewable resource development through REC market price signals, and lowering overall cost for RPS compliance to CT's customers.	pp. 9-10
Northeast Utilities Association (CL&P and Yankee Gas)	12/21/2012	RPS/Hydro	DEEP should consider strict eligibility requirements, such as that hydropower resource must be either boreal or run of river (these are the lowest carbon emitting hydropower resources based on work completed by independent scientists at Hydro Quebec's Eastman reservoir), and have firm transmission capacity over a new transmission path interconnected into New England.	p. 10
Northeast Utilities Association (CL&P and Yankee Gas)	12/21/2012	ISO-NE	State, utility and other stakeholders should actively participate in current and future discussions with ISO-NE on how the value of demand response can be preserved and grown as the design of the New England wholesale market continues to evolve. Contemplated market design changes for 2017 and beyond could have deleterious effects on the growth of demand response as envisioned in draft CES.	p. 13

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Northeast Utilities Association (CL&P and Yankee Gas)	12/21/2012	Dynamic Pricing	There are potential advantages from dynamic pricing that warrant additional review. Pilots, like the one conducted by CL&P during the summer of 2009, have shown that residential customers who engage in dynamic pricing do shift load in response to price signals, and that the response is stronger when linked to smart thermostats. However, there is no consensus on "engagement" levels, and pilot results show very low penetration rates (e.g., in the 2-5% range). C&I response rates to dynamic pricing are less well understood and thus more difficult to predict.	p. 13
Northeast Utilities Association (CL&P and Yankee Gas)	12/21/2012	Dynamic Pricing	The decision to pursue dynamic pricing needs to be evaluated on a cost/benefit basis. The low value of capacity prices in New England and relatively low penetration of central air conditioning negates much of the value of dynamic pricing and its impact on peak load reduction in today's markets. Additionally, in order to drive significant peak load reductions a large number of customers would need to be engaged, which is a hypothesis that is largely untested. Finally, if CT desires to enable dynamic pricing, AMI is not the only technology choice. Other options should be explored that could provide utilities greater flexibility at a lower cost (i.e., the use of AMR technology that leverages existing broadband connections, more advanced AMR meters, etc.).	p. 13
Northeast Utilities Association (CL&P and Yankee Gas)	12/21/2012	Smart Meters/TOU	Deployment for utilities that already have AMR systems results in a negative business case today, unless very broad societal benefits are taken into account. AMI deployments experience a set of high "fixed" upfront costs that require broad deployments to improve economics. Additionally, several of benefits that AMI provides (energy conservation, operational benefits) can be achieved through more cost-effective tools. Finally, vocal opposition to AMI deployments has forced many utilities and regulators to implement smart meter opt-out provisions which have increased deployment costs.	p. 13

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Northeast Utilities Association (CL&P and Yankee Gas)	12/21/2012	Smart Meters/TOU	At this stage, CL&P believes that a broad-based deployment or a multi-stage roll-out of AMI in Connecticut is not cost-effective at this time. CL&P will continue to evaluate meter technologies and will make the appropriate technology choices and recommendations as older meter technologies need to be replaced. If DEEP wants to make dynamic pricing through AMI an option for participating customers, CL&P believes that those customers should pay for all relevant costs under a separate tariff.	p. 13
Northeast Utilities Association (CL&P and Yankee Gas)	12/21/2012	Munis/Soft Costs/Solar	Page 94 of draft CES states: “Under prices bid by installers as part of CEFIA’s ongoing Solarize pilot, it is now possible to forecast installed costs for residential solar PV in Connecticut that approach grid parity.” Table 1 is described as “reflect(ing) the levelized cost of electricity for residential solar PV under a variety of financing scenarios.” NU infers that the values provided defines "grid parity" to mean generation costs equal to the total retail electric costs for a residential consumer. It should be noted that, if a customer is avoiding their total retail costs, then some of those avoided costs must be absorbed by other retail customers. The value of the subsidy from other customers should be included in any evaluation that is applicable to customers as a whole. An alternative way to determine grid parity is to compare the cost of electricity from an installation to the spot market price of energy, along with the value of any RECs and capacity associated with an installation.	p. 14

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Stakeholders	**Date Filed**	**Main Topic**	**Specific Issue**	**Page Cite**
Northeast Utilities Association (CL&P and Yankee Gas)	12/21/2012	Virtual Net Metering	Draft CES's recommendation to "Expand Virtual Net Metering Opportunities to Promote Deployment of Large-Scale Renewable Systems" appropriately recognizes the complexity of the issues. NU believes any investigation of options to reduce subsidies should be viewed from the perspective of all customers. The first proposal (to provide incentives through a set of fixed power purchase schedule rates) would be administratively simple for both customers and the utilities when compared with net metering and virtual net metering programs. It also provides greater pricing transparency and reduces extent to which recovery for lost distribution revenues and other components of service would need to be addressed(, when compared to current net metering and virtual net metering programs. In contrast, the proposal of a varied rate schedule is more complex and produces greater pricing and payment variability, which have been viewed unfavorably by project developers.	p. 14
Northeast Utilities Association (CL&P and Yankee Gas)	12/21/2012	Virtual Net Metering	The proposal that renewable generators be modeled as Settlement Only Generators would increase the direct costs of metering, administration and O&M to net metering customers. This option also places additional burdens on customers and utilities associated with market system administration such as data validation, monitoring, and reporting, as well as supply obligations. These added responsibilities and potential risks raise question of whether associated payments for deliveries of renewable power to the market under this proposal are sufficiently offset by the lost benefits of administrative simplicity and lower market costs enjoyed by all customers under prior proposals or compared to current net metering and virtual net metering programs.	

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NRG Energy Inc.	12/14/2012	RPS	1) Report does not adequately address the retirement of in-state generation. Must map out a course for maintaining the economic and reliability benefits of in-state generation at existing sites and at more sites as needed. Many rely on ISO New England's Forward Capacity Market for the revenue needed to staff the stations and maintain reliability. With further declines in market prices predicted, when the floor price is eliminated, the operation of these plants will be extremely challenging. The CES must include a plan for the development of repowering and redevelopment projects that will maintain the employment, tax revenue and reliability benefits that these sites have provided for years.	
NRG Energy Inc.	12/14/2012		3) NRG recommends that DEEP remain open to partners that can deliver the full spectrum of admin. services as well as the capital funding and other services needed.	
NRG Energy Inc.	12/14/2012	RPS	CES should place more emphasis on strategies to supplement and replace fossil fuels with indigenous renewable sources of energy such as solar and biomass.	
NRG Energy Inc.	12/14/2012	RPS	RPS goals can be met in a cost effective manner with in-state resources. On p. 22 of the IRP, DEEP stated that REC prices could rise to the level of the Alternative Compliance Payment (ACP) by 2017. REC prices are now only within a few dollars of ACP. Long-term REC and energy contracts need to be in place in order to secure financing for renewable projects.	
NRG Energy Inc.	12/14/2012	RPS/Solar	Solar energy is clean and cost-competitive. Solar has environmental benefits as well as system, economic and portfolio diversity benefits. Solar is now more affordable. NRG suggests that solar growth be expanded and accelerated more than is currently planned. At the pace described in the CES, CT will now come close to meeting its RPS target with in-state resources by 2020.	
NRG Energy Inc.	12/14/2012	ZREC Program	NRG recommends removing the restriction in size from the ZREC program and allowing projects up to 10MW . CT should also consider more than one solicitation per year. NRG also suggests that the ZREC program be increased in funding and that it should be doubled from the current level.	

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NRG Energy Inc.	12/14/2012	RPS/Biomass	Montville Biomass Conversion is an environmental and economic winner.	
NRG Energy Inc.	12/14/2012	RPS/Hydro	NRG recommends caution regarding imported hydro. When all costs are considered, such projects may result in greater costs than anticipated in the IRP. Locally-sited generation has advantages of enhancing the economy and local reliability of the grid.	
NRG Energy Inc.	12/14/2012	Transmission Rates/NEEWS	Policy makers must be concerned about sharp increase in transmission rates. No state-sponsored energy plan has considered the benefits of constructing in-state combined cycle capacity as substitute for the interstate portion of NEEWS project despite evidence that: (1) a generator would have lower incremental costs than the projected impact of NEEWS on transmission rates; and (2) the primary benefit to CT of the NEEWS project is to increase the quantity of generating capacity available for import into CT from plants in other states. Neither NEEWS nor any other transmission project should go forward without careful thought being given to non-transmission alternatives.	
Peoples Action for Clean Energy (Marianne Horn)	12/9/2012	RPS/WTE/Hydro	Does not support inclusion of trash incineration as in Class I. Does not support Canadian hydro.	p. 1
Peoples Action for Clean Energy (Marianne Horn)	12/9/2012	RPS	CES must include solar thermal water heating, expansion of solar electric, wind power and thermal technology.	p. 1
PMC Property Group Inc.	12/21/2012	Submetering	There are benefits of allowing submetering to develop renewable or combined heat and power generation, as well as energy efficiency measures.	p. 2
PMC Property Group Inc.	12/21/2012	Submetering	DEEP should support legislation or policies implemented by PURA that permit electric submetering in buildings that have been converted to residential uses from prior commercial or industrial uses.	p. 1
PMC Property Group Inc.	12/21/2012	Submetering	CT could easily develop and implement submetered customer protection.	p. 5

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PMC Property Group Inc.	12/21/2012	Submetering	Final CES should expand DEEP's support for submetering to include adaptive re-use projects where the installation of electric distribution company metering and related infrastructure would adversely impact the building's economics. Final CES should serve as a platform to support either: (1) a more progressive interpretation of existing law by PURA; (2) additional legislation that would require PURA to liberalize the submetering rules; or both.	p. 6
PurePoint Energy LLC	11/14/2012	RPS/Solar	The solar market is currently making great strides in its maturity and ability to offer energy solutions that are cost-effective and efficient. Thanks to these advancements coupled with CT's programs that support these energy technologies, CT's solar market is growing and is one of the leaders in the nation. It is of great importance that CT continue to cultivate both the solar and renewable energy market as a whole.	p. 1
ReEnergy Holdings	11/15/2012	RPS	Their company (a medium-sized biomass power, renewable power company), is making investments in the future of the RPS based on the understanding that there is a stable market where the rules of the game are predictable. Thus they caution against any changes to the RPS that could undermine this.	
ReEnergy Holdings	11/15/2012	RPS	Appreciates that the CES does not make any determinations about the RPS or any recommendations for how the RPS will be adjusted, if at all. It should be kept as its own study. Would recommend that the RPS study process includes stakeholders and others to be included in the process with the ability to provide input.	
ReEnergy Holdings	12/21/2012	RPS/Hydro	Does not support inclusion of Canadian Hydro in RPS.	p. 1
ReEnergy Holdings	12/21/2012	RPS	ReEnergy fears that overly strict environmental rules would unfairly hinder new energy investment.	p. 1
ReEnergy Holdings	12/21/2012	RPS	ReEnergy stresses the importance of long term contracts to meet long term goals and stabilize prices.	p. 2

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RENEW (Renewable Energy New England)	12/21/2012	Procurements	State action through procurements suing long-term contracts can avert any future shortage of renewable energy supply. RENEW hopes DEEP will explore the use of its Commissioner's authority (as provided by the General Assembly) to create solutions for obtaining cost-effective generation by using long term contracts.	pp. 2-3
RENEW (Renewable Energy New England)	12/21/2012	Procurements	CT should not cause its ratepayers to incur high costs for programs disproportionately favoring in-state siting of renewable energy projects when the all-in cost of larger, possibly out-of-state, renewable resources can enable the states to meet their collective renewable energy goals at a lower cost and realize other benefits. Coordinated procurement of large scale resources could include and be undertaken in parallel with other programs that encourage development of smaller resources provided the procurement of small resources does not prevent the states from capturing the cost savings from more efficient large scale wind projects.	p. 3
RENEW (Renewable Energy New England)	12/21/2012	Procurements	If DEEP wishes to have "the state break with the common practice of 'picking winners," instead allowing market competition to identify the most cost-effective projects while creating a platform that will encourage a wide range of entrepreneurial efforts," then it must consider procurement schemes that do not limit the size of eligible resources as is the case with the renewable energy programs in PA 11-80.	p. 4
RENEW (Renewable Energy New England)	12/21/2012	Procurements	Appendix B of draft CES contains generic assumptions about the levelized cost of energy from generation resources. Information on solar costs was kept separate from other types of RPS Class I qualifying resources like wind and biomass. This makes it difficult to make helpful comparisons.	p. 4

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RENEW (Renewable Energy New England)	12/21/2012	Procurements	RENEW agrees with DEEP that CT's renewable energy procurements arising from PA 11-80 have dramatically lowered the cost of solar resources developed in the state. RENEW requests, however, that the final CES contain comparable pricing for the non-solar RPS Class I resources in the region under long-term contracts with LDCs in other NE states to enable state policymakers to assess how these contracts compare in cost to CT's recent procurements.	p. 4
RENEW (Renewable Energy New England)	12/21/2012	RPS/Wind	On-shore wind projects are currently economically competitive in comparison to current fossil fuel dominated fleet, even if one ignores broader macroeconomic benefits of investing in clean indigenous wind rather than fossil fuel fired generation. In the years ahead, as offshore wind is further commercialized, it appears likely than new facilities tapping into our abundant off-shore wind resource in the Atlantic waters beyond Block Island will similarly become directly competitive on price, even before taking into account the broader economic benefits and potential for jobs and increased economic activity in southeastern CT.	p. 5
RENEW (Renewable Energy New England)	12/21/2012	Procurements	In furtherance of DEEP's "portfolio approach" to renewable resource procurement, long term contracting opportunities should be available to all Class I resources regardless of size. This will allow CT to strike right balance between local generation with its reliability, direct local jobs and tax benefits, and an out-of-state generation with its substantially lower costs which is itself an economic development benefit.	p. 5

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RENEW (Renewable Energy New England)	12/21/2012	Procurements	Short-term or REC-only contracts will not provide developers with sufficient revenue commitments to secure financing for projects. Long-term contracts spur investments in renewable resources. Long-term contracts also help lower the development cost of renewable energy by giving developers and their investors the confidence to commit their capital. Long-term contracts will also lower cost of capital since most companies will use a risk-rate return. With less risk from long-term contracts, developers will accept a lower return. The arising lower cost will ultimately be passed onto consumers. In addition to lowering the cost of capital, the longer the amortization period for fixed costs, the lower the price in terms of cents per kWh.	pp. 5-6
RENEW (Renewable Energy New England)	12/21/2012	RPS/Hydro	RENEW is concerned about adding Canadian hydropower to RPS, as it believes these imports will neither be cheap (as in "below market") nor necessarily entirely clean. Any import is likely to include fossil-fuel derived non-renewable energy rather than electricity generated entirely by hydropower, therefore, these imports would clearly not meet the intent or objectives of the RPS program.	pp. 6-7
RENEW (Renewable Energy New England)	12/21/2012	RPS/Hydro	Suggestion that out-of-region large hydro might help meet Class I requirements more effectively overlooks the sound reasoning behind numerous prior decisions by virtually all state legislatures in NE to do just the opposite and establish Class I requirements without eligibility for large hydro. RPS requirements are intended to facilitate deployment of sustainable technologies that need financial incentives to be deployed at utility scale. Providing ratepayer incentives to large hydro capacity would amount to sending ratepayer funding out of the country for a resource that is already economically viable and with questionable sustainability and clean energy attributes.	p. 7
RENEW (Renewable Energy New England)	12/21/2012	RPS/Hydro	Large hydropower does not rise to the high level of sustainability of wind or solar resources. The redirecting of rivers and flooding of vast amounts of land that comes with building large hydroelectric projects has significant negative environmental impacts.	pp. 7-8

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RENEW (Renewable Energy New England)	12/21/2012	RPS/Hydro	Making Class I more "technology neutral" will allow already mature resources, such as large-scale Canadian hydro, to meet virtually all the RPS requirements since this is currently the largest and lowest cost option for qualification. Primary outcome will be windfall profits to owners of such resources while effectively driving out opportunities for indigenous and cleaner resources, thereby risking elimination of future development in state/region of solar, wind, geothermal, and fuel cells.	p. 8
RENEW (Renewable Energy New England)	12/21/2012	RPS/Hydro	The biggest beneficiary of making large hydroelectricity resources eligible for Class I RECs will be the government of Quebec as the single shareholder of Hydro-Quebec.	p. 8
RENEW (Renewable Energy New England)	12/21/2012	RPS/Hydro	RENEW does see a potential important role for large Canadian hydropower. Canadian hydro may have a large part in making long distance transmission upgrades more economic, improving the reliability of the power system by diversifying the type of resources able to respond to the variable nature of many renewable resources, and providing that reliability benefit with carbon emissions that, in the long term, are lower than NG resources.	p. 9
RENEW (Renewable Energy New England)	12/21/2012	RPS	DEEP should review its authority under Conn. Gen. Stat. Sec. 16-244o to provide for long term contracts with renewable energy developers and analyze how such procurements, particularly in coordination with the procurements conducted by other states in the region, can ensure the maximum amount of sustainable, renewable resources are developed at the least cost to meet CT's RPS requirements. Long term contracting opportunities will enable industry to make long term investments and reduce the cost of RPS compliance for consumers.	p. 9

Electricity Sector Comments				
Stakeholders	**Date Filed**	**Main Topic**	**Specific Issue**	**Page Cite**
RENEW (Renewable Energy New England)	12/21/2012	RPS	DEEP should examine how renewable resources can provide many longer term economic benefits for consumers. Renewables with their "free" fuel can provide an effective long term hedge against electricity price swings caused by the volatility in NG and other fossil fuel markets. The lack of fuel inputs allows them to be price takers in our regional electricity market. By bidding zero in the real time market, renewable resources make it unnecessary to dispatch more expensive resources with higher operational and fuel costs. The result is a significant reduction in wholesale market clearing prices.	p. 10
RENEW (Renewable Energy New England)	12/21/2012	RPS	DEEP should explore how additional renewable resources and increased support for EE can mitigate size/cost of an expansion of the state's NG distribution system and the interstate pipelines serving the state. During peak winter months, generation diversity helps ensure that sufficient gas is able to meet the twin demands of space heating and electric generation.	p. 10
RENEW (Renewable Energy New England)	12/21/2012	RPS	DEEP should consider how CT's renewable energy industry benefits from regional RPS policies regardless of whether projects are sited within the state, in NE or across the country.	p. 10
Retail Energy Supply Association	11/15/2012	Retail Providers	Appreciates the benefits that the retail market has brought to the industrial sector, which is in the Industry Chapter. However, RESA also encourages DEEP to consider the benefits it can bring to the residential sector. Examples of residential sector incentives from retail markets include free weekends, free Saturdays, free nights, etc. RESA encourages DEEP to take a harder look at what can be done from a retail perspective rather than from a regulated perspective where all ratepayers pay.	

Electricity Sector Comments				
Stakeholders	**Date Filed**	**Main Topic**	**Specific Issue**	**Page Cite**
Retail Energy Supply Association	11/15/2012	RPS	Stakeholder input for the RPS report should be allowed before a draft is issued. RESA cautions DEEP in making any changes to the RPS to be sure to consider that there are people with existing contractual relationships with customers in which they've relied on the existing law in making pricing decisions for those customers, etc. While many of these contracts include change-in-law provisions, it simply means the customer then is going to have an increase in price.	
Retail Energy Supply Association	11/15/2012	RPS	RESA asks that changes in the RPS be applied retro-prospectively only for few future years, or have something that grandfathers existing contracts to the customers or does not unfairly impact those customers from changes when they already have a contractual relationship.	
Retail Energy Supply Association	12/21/2012	Retail Providers	CES should acknowledge/encourage the role of competitive market. While DEEP acknowledges that industrial customers can decrease their energy costs if they switch to competitive retail suppliers, draft CES fails to recognize ability of commercial and residential customers to achieve that same benefit.	p. 5
Retail Energy Supply Association	12/21/2012	Retail Providers	DEEP should establish paradigm that would allow for a more efficient market structure in which: (1) competitive retail providers concentrate on providing market based generation supply options; and (2) EDCs concentrate on providing reliable and cost-effective transmission and distribution services. To do so, CES must recognize and account for the role of competitive market, and provide competitive market the opportunity to offer solutions (before creating regulatory programs that impose greater costs on all ratepayers that can create unintended barriers to high value competitive offerings).	p. 5

Electricity Sector Comments				
Stakeholders	**Date Filed**	**Main Topic**	**Specific Issue**	**Page Cite**
Retail Energy Supply Association	12/21/2012	Smart Meters/TOU	The ability to access real-time customer data available from smart meters enables suppliers to offer consumers price responsive demand products as well as other new and innovative products. For example, in states where retail market structures provide the appropriate environment, the following products have been offered by competitive providers (rather than the incumbent utility): (1) Power-to-Go: A smart meter-based technology that allows customers to exercise a far greater level of control in their purchasing and consumption of electricity; (2) Free Power Saturday Plan: With the use of smart meter technology, the program is designed to encourage and empower residential consumers to reduce electricity consumption during higher-priced weekly peak hours; (3) Home Energy Manager: A smart-meter compatible home energy manager that will allow homeowners unprecedented level of control over home energy usage.	p. 5
Retail Energy Supply Association	12/21/2012	Smart Meters/TOU	With smart meter data collecting, an internet based system would make programming easier than traditional code based programming and could reduce the amount of intervention required by EDC personnel (as the information is populated directly from customers' meters into the web based system and accessed directly by the supplier). By using an internet based system, the transmission of customer data can also be protected through secure sockets layer (the standard security technology for establishing an encrypted link between a web server and a browser to ensure that all data passed between the web server and browsers remain private).	p. 6
Retail Energy Supply Association	12/21/2012	Smart Meters/TOU	Electronic Data Interchange (EDI) standards should include key data elements to help retail suppliers effectively prepare and structure pricing offers for their customers.	p. 6

Electricity Sector Comments				
Stakeholders	**Date Filed**	**Main Topic**	**Specific Issue**	**Page Cite**
Retail Energy Supply Association	12/21/2012	Smart Meters/TOU	DEEP should require PURA to reinvigorate the Electronic Business Transactions Working Group (EBT Working Group) to allow for evaluation of current customer data elements and data access methods, and to require EDCs to improve access to customer data by: (1) providing all customer data via EDI; (2) defining a standard IP based access in a common language or data standard (XML); and (3) including key data elements so that competitive providers have access to information needed to effectively prepare and structure innovative pricing offers for their customers.	p. 7
Retail Energy Supply Association	12/21/2012	RPS	The RPS study should take into account potential impacts on customers and the competitive market for electricity. By rushing into a study, DEEP may fail to account for significant impacts that changes in the RPS may have on customers and the retail competitive market for electricity. Thus, DEEP should ensure that any changes in RPS take into account existing contractual relationships and grandfather existing contracts (i.e. exempt from any new or increased RPS, contracts entered into prior to the effective date of any change in the RPS until the expiration of such contracts).	pp. 7-9
Retail Energy Supply Association	12/21/2012	Procurements	DEEP should avoid usage of long-term contracts between EDCs and developers as a means to spur renewable project development. As a general rule, if investment in renewable generation makes business sense, whether via ownership of long-term contracts, private capital will flow into those investments. If the marketplace does not step up, then this indicates that the right price signals are not being sent. Therefore, allowing an EDC to enter into a long-term contract for renewable generation under these circumstances should be cause for concern since stranded costs of any unwise investment will be borne by ratepayers.	p. 10

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Stakeholders	**Date Filed**	**Main Topic**	**Specific Issue**	**Page Cite**
Retail Energy Supply Association	12/21/2012	Procurements	DEEP should allow competitive market to determine the appropriate investment instead. If DEEP decides to employ long-term contracts, such an approach can meet legal requirements and realize the best ratepayer value if solicited throughout the region eligible to supply RECs. Moreover, to the extent DEEP does permit the EDCs to enter into long-term contracts to satisfy their RPS obligations, DEEP should ensure that costs of such contracts are recovered in generation portion of a customer's bill. Generally, the decision of which costs should be allocated to the EDCs' generation rates should be based on cost causation principles.	
Retail Energy Supply Association	12/21/2012	RPS	DEEP should continue to require that all costs associated with EDCs' purchase of RECs be collected through the generation portion of rates.	p. 12
Rivers Alliance of Connecticut	11/25/2012	RPS/Hydro	State should settle on a definition of low-impact hydropower. While Class I run-of-the-river criterion is good, the requirements that Class I hydro be small (5mw or less) and new (post-2003) are harmful. State should consider using Low-Impact Hydropower Institute (LIHI) certification.	
Rivers Alliance of Connecticut	11/25/2012	RPS/Hydro	State should evaluate and set goals for imported hydropower. The goals will affect the price and function of energy credits.	
Sierra Club	12/21/2012	General	The CES process affords an important opportunity to take stock of the progress CT has made to date in achieving its long-term energy goals, including those set forth in the RPS, GWSA, PA 08-98, and to articulate a strategy for helping the state reach these and other energy goals.	p. 1
Sierra Club	12/21/2012	Procurements	Sierra Club applauds the draft CES's stated intention of using economic incentives, including power purchase agreements, to foster the development of renewable energy. However, the draft CES lacks a commitment to pursuing PPAs at a scale that will help meet a meaningful portion of CT's RPS targets. PPAs are likely necessary at this point to bring renewables to scale quickly. The final CES should strongly emphasize the importance of long-term contracts for renewables, as the market needs this for planning, stability, and adequate funding.	p. 2

Electricity Sector Comments				
Stakeholders	**Date Filed**	**Main Topic**	**Specific Issue**	**Page Cite**
Sierra Club	12/21/2012	GHG Emissions Reductions	DEEP should focus on mechanisms for reducing the costs of achieving the RPS's current targets rather than significantly modifying those targets. Although Sierra Club is supportive of increasing the 20% by 2020 target, such an increase should not be coupled with a broadening of the resources that count as Class I renewables. CT's EE goals, for example, should remain distinct from its renewable generation goals, and carbon-intensive resources such as waste incineration and new, large-scale Canadian hydro, should remain outside the definition of Class I. Instead, there should be more emphasis on regional solutions particularly in light of the New England Governors' agreement to initiate a regional renewable RFP by the end of 2013.	p. 3
Sierra Club	12/21/2012	Munis/Soft Costs/Solar	CT should continue to pursue cost-effective in-state renewable solutions, including reducing the soft costs of distributed renewables to increase penetration of rooftop solar in the state.	p. 3
Sierra Club	12/21/2012	RGGI	The ongoing programmatic review of RGGI provides a tremendous opportunity to increase funding available for CT's clean energy initiatives and drive meaningful progress toward CT's GHG commitments. The draft CES however, currently fails to address the opportunities presented by the current review process. Sierra Club joins the numerous other groups in the region in calling for a 20% reduction below actual emission limits by 2020 as part of the present RGGI review process.	p. 3

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Stakeholders	**Date Filed**	**Main Topic**	**Specific Issue**	**Page Cite**
Sierra Club	12/21/2012	ISO-NE/GHG Emissions Reductions	Final CES must include a more detailed analysis of the rate and emission impacts of retiring the Bridgeport coal plant, and this analysis should be accompanied by a request to ISO-NE for a detailed reliability analysis on the plant. Pursuant to the statute, the CES must include, "an assessment of the potential costs savings and benefits to ratepayers, including, but not limited to CO2 emissions reductions or voluntary joint ventures to repower some or all of the state's coal-fired and oil-fired generation facilities built before 1990." (Conn. Gen. Stat. 16a-3a(a)). With its coal unit constructed in 1968 and emitting more than half a million tons of CO2 in 2011, Bridgeport Harbor Station falls squarely in this plant demographic, and as such should be analyzed for retirement in the final CES. Moreover, until the plant fully complies with the most current environmental requirements including for both its air emissions and water discharges.	p. 4
Sierra Club	12/21/2012	Other Electricity Sector Comments	While Sierra Club recognizes the desire to reduce energy prices in CT, it cautions against pursuing short-term benefits to the detriment of CT's long-term fiscal, environmental and public health. Public expenditures to promote EE and support renewable energy development through long-term PPAs will save CT and its bill payers money over the 40 year planning horizon of the CES. These efforts will also improve lives by providing cleaner air and water to CT citizens.	p. 4
Sierra Club	12/21/2012	Munis/Outreach	Public understanding of the importance of energy issues is critical for both public acceptance of state-infrastructure programs and willingness to take individual action in support. The CES should emphasize the importance of education programs and outreach. The role the municipal energy commissions/task forces and the robust NGO community can play should be recognized and supported.	p. 4
Sierra Club	12/21/2012	RPS	CT should actively engage in the recently initiated coordinated regional renewable procurement process.	p. 9

Electricity Sector Comments				
Stakeholders	**Date Filed**	**Main Topic**	**Specific Issue**	**Page Cite**
Sierra Club	12/21/2012	RPS	DEEP expresses concern in the Draft CES that 'demand for renewable generation across NE is expected to outpace available supply.' This is not for lack of resources. The 2009 NE Governors' Renewable Energy Blueprint identified more than 10 GW of on-shore and off-shore wind power potential in the region, far exceeding the amount necessary to meet the region's renewable energy goals. Moreover, a 2011 Request for Information by the NE States Committee on Electricity resulted in proposals from 'more than 50 renewable generation projects totaling more thank 4,700 MW and 7 transmission projects designed to facilitate delivery of renewable energy to NE loads.' They provide info on where on-shore off-shore wind capacity lies, additionally they provide info on projects that the state is already involved in. In conclusion, the club takes no position on the prudence of NEEWS in particular, but highlights it in the comments to illustrate that regional transmission coordination is already occurring.	pp. 9-11
Sierra Club	12/21/2012	RPS/Regional Participation	The best way to obtain information about the costs and benefits of regional renewable energy development is to participate in NESCOE's coordinated regional RFP, which will be issued by the end of 2013. Participation in the RFP does not commit the state to procuring renewables should they prove to be cost-prohibitive. Rather, DEEP should take advantage of the RFP process to survey practical renewable options for CT, including long-term PPAs. In light of the tight policy and infrastructure interconnections between NE states and ongoing regional processes, including the construction of the NEEWS and the NE Governors' commitment to a regional procurement by Dec. 2013, the club urges DEEP to actively pursue opportunities to coordinate and collaborate with other NE states and with NESCOE in developing its energy strategy and maintain a regional focus in analyzing decisions across the state.	p. 11
Sierra Club	12/21/2012	RPS	DEEP should make the RPS study available for public comment and incorporate the study and the feedback the DEEP receives into the final CES.	p. 12

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Stakeholders	**Date Filed**	**Main Topic**	**Specific Issue**	**Page Cite**
Sierra Club	12/21/2012	RPS	Because of the importance of the pending RPS study to attainment of the state's energy goals, they urge DEEP to not finalize the CES until the RPS study is completed, including an opportunity for public comment on the results and recommendations of the study.	p. 14
Sierra Club	12/21/2012	RPS	DEEP should not expand the definition of what counts as a Class I renewable. The goal of the RPS was to ensure that resources that might otherwise not be built are in CT's generating portfolio based on the recognition that these resources provide distinct benefits to CT by protecting the public health and safety and minimizing negative environmental impacts.	p. 14
Sierra Club	12/21/2012	RPS/Hydro/WTE	Class I should not include waste-to-energy nor Canadian large-scale hydro. A report by Synapse Energy Economics demonstrates that the environmental impacts of hydropower are more severe than assumed, specifically the emissions from large boreal hydro projects. Any small hydro facility should qualify as a renewable resource only if it is run-of-river and approved by the Low Impact Hydropower Institute. Subsidizing Canadian hydro is fiscally misguided.	pp. 14-15
Sierra Club	12/21/2012	RPS	CHP and EE should not be Class I. Rather than modify the definition of Class I, DEEP should focus on implementing practical solutions to ensure that CT's utilities are able to cost-effectively comply with the Class I requirements for the duration of the RPS.	pp. 14-15
Sierra Club	12/21/2012	Munis/Soft Costs/Solar	DEEP should pursue strategies that lower the cost of in-state renewable resources such as distributed PV solar.	p. 16
South Central Regional Water Authority	12/4/2012	Virtual Net Metering	Virtual net metering should be expanded. Many water treatment facilities are sited on or near large land tracts ideally suited for renewable and/or alternative energy projects. Virtual net metering would greatly incentivize such projects by providing opportunities for water utilities to lower system-wide electrical costs while also benefitting ratepayers, the environment and emergency preparedness.	

Electricity Sector Comments				
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South Central Regional Water Authority	12/4/2012	Virtual Net Metering	SCRWA believes that water treatment plants are appropriately listed as critical facilities to be included in the piloting of microgrids. Other critical water system facilities such as pump stations and operations centers should also be added to the list.	
SunEdison LLC	11/15/2012	RPS/Solar	CES is right to conclude that solar is quickly approaching retail grid parity . This is exhibited by the market clearing prices in ZREC program, the first solicitation issued by the utilities this year with the market clearing price of approximately $150/MWh or half the max bid price allowed under the program. Believes that these costs should come down over the 6-year life of the program to the point where by 2017, solar should be self-sustaining and cost-competitive with other resources, to self-sustain without any incentives.	
SunEdison LLC	11/15/2012	RPS/Solar	The fact that solar is approaching grid parity should bear on the RPS Class I issue. CES puts forward hypothetical resource portfolio mix to fill what obviously is a concern over a growing gap between the targets and the in-region resource potential. SunEdison believes that for solar a 2GW target is eminently achievable and cost-effective.	
SunEdison LLC	11/15/2012	RPS/Solar	As gap between solar costs and retail rates to customers declines, so too will the required incentive necessary to motivate customers to deploy solar. NJ is approaching 1GW of installed solar capacity, and grows installed solar energy at 30MW/month. A greater reliance of solar should be considered in lieu of resources that really provide none of the local economic development benefits of an indigenous solar resource base.	
SunEdison LLC	11/15/2012	Virtual Net Metering	SunEdison supports many of the recommendations related to virtual net metering and the reduction of soft costs.	
SunEdison LLC	11/15/2012	Munis/Soft Costs/Solar	SunEdison is looking to see some controls on soft costs of solar and a reduction in variability across CT. CT needs to do more standardized permitting fees and property taxes for solar to create a level playing field.	
SunEdison LLC	12/13/2012	RPS/Solar	In-state solar can address much of the projected Class I RPS deficit.	

Electricity Sector Comments				
Stakeholders	**Date Filed**	**Main Topic**	**Specific Issue**	**Page Cite**
SunEdison LLC	12/13/2012	Munis/Soft Costs/Solar	CT can help drive down solar soft costs such as taxes, permitting, labor, financing and other distinct local factors.	

Electricity Sector Comments				
Stakeholders	**Date Filed**	**Main Topic**	**Specific Issue**	**Page Cite**
SunEdison LLC	12/13/2012	Munis/Soft Costs/Solar	Property tax reform, as applied to solar resources, is needed.	
SunEdison LLC	12/13/2012	Munis/Soft Costs/Solar	CT can have an exemption for ZREC-eligible systems. CT could provide a local option for exempting non-residential solar PV systems from property tax liability. This would be a limited exemption option for PV systems that meet ZREC qualifications. CT could adopt a standardized valuation for systems subject to property taxes.	
SunEdison LLC	12/13/2012	Munis/Soft Costs/Solar	CT has the highest permit fee structure for solar PV in the US. The sliding-scale fee should be changed to a fixed fee approach.	
SunEdison LLC	12/13/2012	Virtual Net Metering	SunEdison advocates increasing scale through municipal net metering aggregation. The requirement that municipalities own the virtual net metering system presents an insurmountable barrier. The statewide $1 million cap on virtual net metering credits is prohibitively small. CT should shift to an installed capacity metric that is set at a percentage of the utility's historic peak load. Last, PA 11-80's valuation of net excess generation at wholesale in insufficient to offset the incremental cost of capacity required to serve satellite accounts. DEEP should explore the approach taken by Austin Energy to establish a quantitative credit that reflects the value of solar energy to the distribution system and non-generating customers.	
Toxics Action Center	12/13/2012	RPS/Climate Change/WTE	Fossil fuel power plants, trash incinerators, and hydro-fracking are three of the greatest threats to public health in our part of the world. Childhood asthma in CT is out of control. Climate change is happening right before our eyes. He questions why CES is recommending trash incineration and methane as good, clean, even renewable fuels. Methane is not clean. Trash is not a renewable resource.	p. 1
Toxics Action Center	12/13/2012	General	The CES is a very poor attempt to 'compromise' or 'balance' energy, economy, and environment. CT must aim for zero waste.	p. 1
Toxics Action Center	12/13/2012	RPS	CT must aim to meet its RPS goal of 20% by 2020 by driving investment, innovation and infrastructure for truly clean power like wind, solar and anaerobic digestion.	p. 1

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Stakeholders	**Date Filed**	**Main Topic**	**Specific Issue**	**Page Cite**
Toxics Action Center	12/13/2012	RPS	People (and future generations) who live near trash incinerators, around power plants, and downstream of fracking would have their health and well-being sacrificed.	p. 1
Toxics Action Center	12/13/2012	General	TAC is sorely disappointed at DEEP's failure to show true leadership on this subject, and will work tirelessly to ensure a truly visionary, fair and sustainable energy plan for CT.	p. 1
UIL Holdings (CNG, SCG and UI Company)	11/15/2012	General	Overall the company is very supportive of the electricity sections of the draft and believes that pursuit of these recommendations is in the best interest of the state and their customers. Looks forward to working with DEEP to implement certain recommendations in such a way as to not cause cost-shifting among customers and to avoid potential adverse financial impacts to the state's distribution companies that could arise from the use of certain long-term contracts for renewable resources.	
UIL Holdings (CNG, SCG and UI Company)	11/15/2012	Decoupling	Has had revenue decoupling since 2009 and believes it works very well and would advocate decoupling for all distribution companies.	
UIL Holdings (CNG, SCG and UI Company)	11/15/2012	Virtual Net Metering	With respect to virtual net metering, UI thinks it's critically important that only the generation portion of customers' bills be subject to the virtual net metering offset credit. That's the way that the virtual net metering statutes are written now, and they think this is how it should be to make sure there is no free use of the system by nonparticipating customers.	
UIL Holdings (CNG, SCG and UI Company)	11/15/2012	Smart Grids/Meters/TOU	They support TOU rates and dynamic pricing, but they caution and think that any of these policies should not be mandatory for customers, but rather voluntary. They support a menu of options for customers.	
UIL Holdings (CNG, SCG and UI Company)	11/15/2012	RPS	They have concern with areas of the draft that identify a number of options that may be used to meet RPS standards (resulting in long-term contracts between renewable generators and distribution companies). They have raised this concern over the past several years, because these contracts are increasingly scrutinized by rating agencies, which could have adverse impacts on the ratings of the company and therefore cost the customer. They argue for caution.	

Electricity Sector Comments				
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UIL Holdings (CNG, SCG and UI Company)	12/21/2012	Decoupling/Rates	Supports full revenue decoupling for all of its operating companies to best align state conservation policy with rate recovery.	p. 2
UIL Holdings (CNG, SCG and UI Company)	12/21/2012	Procurements	Long-term electric renewable contracts must be given ironclad legislative assurance of cost recovery so as to not jeopardize the EDCs' investment grade debt rating.	p. 2
UIL Holdings (CNG, SCG and UI Company)	12/21/2012	Decoupling/Rates	CES appropriately recognizes that UI's current allowed rate of return is unusually low by national standards.	p. 2
UIL Holdings (CNG, SCG and UI Company)	12/21/2012	Smart Grid/ Metering/TOU	TOU electric rate design should remain optional.	p. 2
UIL Holdings (CNG, SCG and UI Company)	12/21/2012	Submetering/Virtual Net Metering	There are instances where the Draft recommends initiatives that could lead to cost shifting from participating customers (those who directly benefit from such initiatives) to non-participating customers. Among these initiatives is the expanded applicability of sub-metering and expanded virtual net metering for behind-the-meter renewable generation. In both cases, costs would likely be shifted from participating customers to non-participating customers. While there is ample analysis (from 3 separate IRP documents) to support such cost shifting for the expansion of EE programs, UI is not aware of any rigorous analysis that supports these other initiatives and believes that such analysis may be beneficial before proceeding.	p. 7
UIL Holdings (CNG, SCG and UI Company)	12/21/2012	Smart Grid/ Metering/TOU	With respect to virtual net metering, UI thinks it's critically important that only the generation portion of customers' bills be subject to the virtual net metering offset credit. In addition, the use of settlement only generators in the ISO-NE market system may provide a revenue stream to support this initiative but it is unlikely to eliminate the subsidy from other customers to the virtual net metering participants.	pp. 7-8

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UIL Holdings (CNG, SCG and UI Company)	12/21/2012	Procurements	On 8/31/12, UI filed comments with NESCOE to raise awareness of the need for legislative cost recovery for long-term electric renewable contracts. The NESCOE comments refer to a whitepaper by the Brattle Group called "Understanding Debt Imputation Issues". UI strongly recommends that if DEEP seeks to pursue a renewable energy strategy that relies on the electric distribution companies executing long-term contracts, that it do so by sponsoring legislation that provides for very clear and ironclad cost recovery, and that it work with representatives of these companies to craft legislative language that minimizes the potential for adverse financial impacts.	p. 8
UTC Power	12/14/2012	RPS/Hydro	Allowance of an out-of-state resource, such as Canadian Hydro Project, would send wrong message to in-state Class I technologies while decreasing opportunity for in-state job and revenue growth. Canadian Hydro should not be eligible to meet Class I RPS goals for the State.	p. 1
UTC Power	12/14/2012	Fuel Cells	Through use of renewable and non-renewable fuels, stationary fuel cells can help provide grid stability and manage the intermittency of "traditional" renewables at micro level. Expanding focus beyond solar PV to a discussion about levelized cost of energy for base load tech creates a more balanced approach for production of clean energy during off-peak times, when solar PV would require large scale battery storage to operate effectively.	p. 2
UTC Power	12/14/2012	Virtual Net Metering	Virtual Net Metering should be expanded beyond munis to include any EDC customer.	p. 2
UTC Power	12/14/2012	Virtual Net Metering	Definition of Virtual Net Metering in Section 121(a)(6) should clearly refer to the five meters that constitute the virtual net metering facility, rather than the energy source. If definition and ownership requirement are placed on the power source, and not the facility and meters, opportunities for a muni to utilize virtual net metering would be eliminated.	p. 2

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UTC Power	12/14/2012	Submetering/CHP	Electric submetering regulations should be expanded to allow all multi-family properties to implement submetering in conjunction with the use of Class 1 DG onsite, thereby reducing energy costs for tenants and building owners dramatically. Mixed-use and multi-family residential buildings are prime market for stationary fuel cells with CHP.	pp. 2-3
UTC Power	12/14/2012	RPS	The amount in MW of Class 1 renewable generation that each EDC is allowed to own as an aggregate should be increased from current max of 30MW, to a minimum of 50MW per year for 5 years, a total of 250MW.	p. 3
The Vote Solar Initiative	12/14/2012	RPS/Solar	Ability of CT's solar resources to meet RPS goals should not be underestimated. All market trends indicate that the 2.7 GW solar goal is achievable without new incentives	p. 1
The Vote Solar Initiative	12/14/2012	Munis/Soft Costs/Solar	DEEP should explore all possible options, ranging from state legislation to guidelines for munis to cut as much red tape as possible (permitting and interconnection processes) so that customers are not paying more for clean energy than needed. As the price of solar panels continues to drop, more and more of a solar energy system's costs are now due to paperwork and administrative processes involved in getting the system approved and built. These soft costs can represent as much as 50% of total cost. Solar permit fees in CT are among the highest in the nation. CT should develop a more appropriate solar permit fee structure. TVSI supports a uniform statewide fee structure based on a percentage of the delivered cost of the solar project.	pp. 1-2

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The Vote Solar Initiative	12/14/2012	Munis/Soft Costs/Solar	It should be ensured that local property taxes are not preventing solar development. TVSI supports CES's call for property tax reform for solar projects. TVSI recommends: (1) [Local option] Provide munis the option to exempt non-residential solar PV systems from property tax liability. Alternatively, exemption could be the default, and munis could opt to levy property taxes on solar projects, subject to number 2; (2) [Standard valuation] Those jurisdictions that do choose to levy property taxes on commercial-scale solar projects should be required to utilize a uniform valuation approach based on project's generating capacity (as recommended by experts at the North Carolina Solar Center in a recent report).	p. 2
The Vote Solar Initiative	12/14/2012	Virtual Net Metering	Access to solar energy could be broadened to more customers by enabling investment in shared solar projects. TVSI supports CES's conclusion that the current virtual net metering program requires modification in order for munis to effectively take advantage of it. CT should look to virtual energy crediting as a mechanism for broadening access to solar energy to customers who are unable to install solar on their own property. TVSI estimates that at least 75% of energy customers cannot use solar because they rent, have shaded/unsuitable roofs, or other reasons.	pp. 2-3
Wilton Energy Commission	12/12/2012	Smart Grid/ Metering/TOU	The further development of TOU and variable peak pricing and summary metering is necessary to encourage the shifting of usage to off-peak hours.	p. 2
Wilton Energy Commission	12/12/2012	RPS/Hydro	Canadian hydros should not be allowed to qualify for incentives by CT ratepayers. It simply sends money from CT out of the country. No additional reliability, energy price, or environmental benefits would be achieved. It will eviscerate investments in state and in-region wind projects, fuel cells, and other Class I technologies.	p. 2
Wilton Energy Commission	12/12/2012	RGGI	Support DEEP's commitment to RGGI and consideration to push for a lower emissions cap that represents a significant decrease from actual emissions, and places CT on track to a 80% reduction by 2050.	p. 2

Electricity Sector Comments				
Stakeholders	**Date Filed**	**Main Topic**	**Specific Issue**	**Page Cite**
Wilton Energy Commission	12/12/2012	Reliability/Security	Draft CES is silent on resiliency and reliability for residential customers. The utilities' distribution hardening program has been ineffective and their emergency communication system is inadequate. The CES should demand a better remedy to this need than is presently being pursued by the utilities.	p. 2
Citizens (see citizen list)	12/12/2012	RPS	To meet GWSA, strengthen local economy, and stabilize the cost of electricity, CT needs to continue to build renewable energy projects in CT and on the New England power grid. Opposes CES's suggestion to weaken RPS by allowing existing trash incinerators and environmentally-damaging hydropower projects in Canada to qualify. This will prevent wind and solar projects from getting built locally, depriving CT of their economic and environmental benefits.	p. 1
Citizens (see citizen list)	12/12/2012	RPS	DEEP should make New England wind and solar a central part of CES's long-term vision. DEEP should commit to a date by which CT and New England will be entirely powered by renewable electricity.	p. 1
Judith Allen	12/14/2012	RPS/Hydro/WTE	Opposes allowing Canadian Hydro to qualify as a Class I renewable due to serious environmental concerns. Rather, CT should invest in regional wing, fuel cell, solar and other Class I renewables. Opposes any trash incinerator inclusion in the RPS. It would be shortsighted for CT to build pipelines for natural gas. New energy options need to be affordable.	
Henry E. Auer	12/3/2012	RPS/Solar	Draft CES states that there are 1,800 miles of high-voltage transmission lines in CT. This gives between 33 and 65 square miles of right of way, assuming a width of 100-200 feet. Let us assume that about 2/3 of this area is available for installation of PV panels, and that conservatively solar farms in CT are 1/2 as efficient as those in CA. Using the MV per acre value of 0.11 MW/acre, this conservative estimate provides that potentially 850-1700 MW (AC) of solar capacity could be installed in CT's rights of way. Instead of expanding natural gas pipelines, DEEP should consider installing these solar farms accordingly.	p. 1

Electricity Sector Comments

Stakeholders	Date Filed	Main Topic	Specific Issue	Page Cite
Barbara Sterling Backman	12/4/2012	RPS	The state must continue the strong leadership shown by Clean Energy Fund in supporting energy conservation, PV installations at commercial scale, solar thermal, geothermal, micro hydro, wind, local grids.	p. 1
Barbara Sterling Backman	12/4/2012	RPS/WTE/Hydro	Burning trash is not clean energy. Hydro power from Canada is not clean energy. The infrastructure to bring this outside the state, fossil fuel into and throughout the state, is massive.	p. 1
Lynne Bennett	12/14/2012	Microgrids	Microgrids, as well as small cogeneration, could be appropriate technology for affordable housing, such as those at the Neighborhood Housing Services in New Haven.	
Aaron Danenburg, Graduate Research Assistant, Univ. of Hartford	11/15/2012	RPS/Geothermal	Emphasis should be focused on Ground Source Heat Pump (GSHP) systems as a means to significantly reduce peak demand and to understand its effect on dynamic energy costs. It is known that GSHP is a highly efficient means of cooling water through substantially reducing power consumption. A GSHP also reduces peak demand in the winter. The demand charge requires a modification with respect to GSHP systems to account for the savings they present to the grid. A new rate classification that is more representative of their costs to the grid will open up market allowing the technology to provide a means to reduce fuel consumption.	
Susan Eastwood	12/13/2012	RPS	To improve air quality, meet GWSA commitments, strengthen local economies and stabilize the cost of electricity, large-scale renewable energy projects should be built in CT and on the New England power grid.	p. 1
Susan Eastwood	12/13/2012	RPS/WTE/Hydro	Opposes weakening of RPS by allowing existing trash incinerators and environmentally damaging hydropower projects in Canada to qualify.	p. 1
Susan Eastwood	12/13/2012	RPS	Urges DEEP to make New England wind and solar a central part of the CES's long-term vision. Asks DEEP to commit to a date by which CT and New England will be entirely powered by renewable electricity.	p. 1
Susan Eastwood	12/13/2012	RGGI	Urges CT to set a tougher limit for CO2 emissions in RGGI. Setting a goal of reducing emissions by 20% below current levels by 2020 would be acceptable.	p. 1

Electricity Sector Comments				
Stakeholders	**Date Filed**	**Main Topic**	**Specific Issue**	**Page Cite**
Dan Fischer	12/18/2012	RPS/WTE	CT should not expand the role of WTE. Incineration emits large amounts of nitrogen oxides, carbon monoxide and other toxins connected to cancer, asthma, diabetes, and learning problems. An incinerator emits more CO2 per unit of energy than a coal-fired plant. Composting and recycling create 10 more jobs than incineration. He supports replacing incinerators with composting and recycling and committing to a zero-waste goal.	p. 1
Dan Fischer	12/18/2012	RPS/Hydro	CT should not count as 'renewable' the energy imported from mega-hydro projects in Quebec that Innu First Nation members say devastate their traditional lands and cultures. During summer 2012, an Innu delegation traveled to Vermont to demonstrate against the New England governor's conference promoting Hydro-Quebec's development on their land. In October, 2012, some Uashat-Maliotenam members blockaded a road because they said they have been excluded from policy-making related to their land's development. The CES must remove Canadian mega-hydro out of respect for both the Innu First Nations' sovereignty and CT's need for local green jobs. Imported energy should not count towards CT's RE goals.	pp. 1-2
Dan Fischer	12/18/2012	GHG Emissions Reductions	By its own admission, the CES falls short of meeting CT's statutory emissions reductions goals, and far short of science-based and justice-based goals. The CES admits in the Executive Summary that 'significant additional measures and breakthrough technologies will be required to achieve the goal' of cutting CO2 emissions even 10% below 1990 levels by 2020. The CES should not only include these 'significant additional measures' but commit to at least the targets in the People's Agreement of the World's People Conference and the Rights of Mother Earth. This means 50% below 1990 levels by 2017 and 300 ppm of GHG.	p. 2

Electricity Sector Comments				
Stakeholders	**Date Filed**	**Main Topic**	**Specific Issue**	**Page Cite**
Dan Fischer	12/18/2012	Nuclear	CES should replace Millstone Nuclear Power Station with renewables and decreased capacity. CT Coalition Against Millstone and other anti-nuclear groups document how nuclear power plants increase radioactive strontium in mothers' milk and babies' teeth. Fukishima showed how the dangers of nuclear meltdown are severe and real.	p. 2
Dan Fischer	12/18/2012	GHG Emissions Reductions	Other false solutions supported by the CES included carbon trading and 'clean coal'. For more information on false solutions see Hoodwinked in the Hothouse, 2nd Edition by Carbon Trade Watch and Rising Tide North America.	p. 2
Dan Fischer	12/18/2012	GHG Emissions Reductions	CT's statutory 10% by 2020 target, which the CES does not meet, was not created by environmentalists. To the contrary, it came from a 2003 NY GHG Task Force report commissioned by NY Republican Governor Pataki. The Task Force included members of JP Morgan Chase, Ford Motor Company, the natural gas company Niagara Mohawk and coal company Reliant Energy. These are not environmentalists! That 2003 report admitted that even this reduction "would be insufficient to...stabilize CO2 concentrations at the 450ppm or 550ppm levels and prevent serious climate change." But the CES cannot even meet this goal set by Republicans and corporations.	p. 2
Dan Fischer	12/18/2012	GHG Emissions Reductions	Social movements across the Global South gathered in 2010 at the World People's Conference on climate change and demanded that industrialized countries cut co2 emissions at least 50% below 1990 levels by 2017, in line with global atmospheric CO2 level of 300 ppm. This is a target in line with what science and human rights demand. It is what his generation and future generations demand. The CES regrettably does not even "come close to coming close to coming close."	p. 2
Dan Fischer	12/18/2012	GHG Emissions Reductions	The CES should facilitate a just transition to a low-carbon, zero-waste CT. This transition is both possible and necessary.	p. 2
Dan Fischer	12/18/2012	RPS	A number of studies have shown that a rapid transition to 100% RE is possible.	p. 2

Electricity Sector Comments				
Stakeholders	**Date Filed**	**Main Topic**	**Specific Issue**	**Page Cite**
Judi Friedman	12/21/2012	RPS/Solar/Microgrids	An energy strategy emerging from this century must include solar thermal water heating. A relevant and modern strategy would include a strong commitment to the expansion of solar electric and thermal technology, proven job creators, a way to expand the generation of solar vehicles, and a local and safe form of microgrids.	p. 1
Judi Friedman	12/21/2012	Reliability/Security/ Cyber	The CES does not consider the danger from storms like Sandy or cyber warfare both of which are distinct possibilities when we have large vulnerable and brittle grids. Microgrids are more reliable energy options.	p. 1
Judi Friedman	12/21/2012	RPS/WTE/Hydro	Does not support WTE or Canadian hydro.	p. 1
William Glickman	12/13/2012	RPS	Prefers changing from a fossil fuel to renewable resources. Wants a clean energy future.	p. 1
Mitch Kennedy	12/21/2012	RPS/AD	There is little to no mention of harvesting methane from local resource bases. This is a common practice in Europe. Resource bases include municipal landfills, farms, and sewage treatment plants.	p. 2
BJ Lambert	12/13/2012	RPS/Hydro	Adding Canadian Hydro to CT's RPS would be unnecessary and counterproductive. Canadian gov't has already committed to building resources; CT ratepayers need not subsidize those resources. Maintaining original intent of RPS will protect local jobs in CT's renewable energy sector, and go further in supporting the creation of truly green energy.	p. 2
Henry Link	12/10/2012	Microgrids	Funding beyond the $15 million pilot program to establish microgrids in CT for critical energy users is very important.	p. 1
Henry Link	12/10/2012	Innovation Hub	Supports the creation of an Advanced Energy Innovation hub at UCONN.	p. 1
Henry Link	12/10/2012	Smart Grids	Installing smart grids in CT may not be justified for energy security reasons unless increased cyber vulnerability of these grids is able to be mitigated.	p. 1
Henry Link	12/10/2012	RPS	Do not broaden what counts as renewable energy sources when evaluating RPS requirements.	p. 1
Henry Link	12/10/2012	Submetering	Submetering should be allowed in multi-tenant buildings, by either public or private funding.	p. 1
Henry Link	12/10/2012	Decoupling	Decoupling should be implemented.	p. 1
Henry Link	12/10/2012	ISO Participation	Senior DEEP staff should be sent to participate in all ISO-NE and NE Power Pool meetings and relevant FERC meetings.	p. 2

Electricity Sector Comments				
Stakeholders	**Date Filed**	**Main Topic**	**Specific Issue**	**Page Cite**
John Liseo	11/26/2012	RPS/Geothermal	CT should look at ways to demonstrate and provide incentives to use geothermal heat pumps. Geothermal heat pump technology has the ability to provide approx. 4 units of energy for every unit of energy consumed. CT should include geothermal heat pumps in training programs (similar to those on solar in community colleges), and the industry should be involved in that effort.	p. 2
John Liseo	11/26/2012	Microgrids	Supports the idea of microgrids and distributed power generation.	p. 2
John Liseo	11/26/2012	Microgrids/Fuel Cells	Manufacturers of fuel cells are local to CT. Fuel cells can operate on natural gas and are able to generate electricity and heat. With natural gas becoming more plentiful and affordable, it makes sense to promote fuel cells as a source of distributed power generation in the micro grids (as well as creating local jobs).	p. 2
John Liseo	11/26/2012	Munis/Soft Costs/Solar	CT has not done enough to promote the use and installation of solar power. What happens to his home tax assessment if he has solar panels installed? Why not pass legislation that exempts solar panels and associated equipment from being taxed? If the state has already passed these types of property tax exemptions it needs to provide information on them? Have legal issues been discussed about access to the sun being blocked by new buildings being constructed and other types of obstructions?	p. 1
Peter Markow (Professor of Chemistry and Environmental Science at University of Saint Joseph, West Hartford, CT)	12/13/2012	RPS/WTE	Opposes draft CES's suggestion to weaken RPS by allowing existing waste to energy (WTE) plants to qualify. Do so will prevent wind and solar power projects from getting built locally, depriving CT of economic/ environmental benefits of wind/solar power resources. CES should ensure that solar and wind power are a central part of CES's long-term vision, and commit to a date by which CT and NE will be entirely powered by truly renewable electricity.	pp. 1-2
Becky May	11/18/2012	General	Advocates for a serious renewable energy plan and commitment for CT.	p. 1

Electricity Sector Comments

Stakeholders	Date Filed	Main Topic	Specific Issue	Page Cite
Pam McDonald, Board Member, CT's People's Action for Clean Energy (PACE)	11/26/2012	RPS/Wind	Advocates for wind power, but states that one of the downsides is its variability. However, as wind farms multiply, this is less of an issue. Rapid growth in wind generation is possible. In the last few years, interest in tidal power has spread rapidly. For example, South Korea is building a 254MW project on its west coast.	
Letty McPhedran	12/10/2012	Munis/Outreach	Thinks that every single time a state official has a press conference or gives a speech, s/he should end with the following statement, "CT is green - join or support your town's Clean Energy Task Force." CES should support and acknowledge such local initiatives.	p. 1
Stephen Meno	12/13/2012	RPS/WTE	Opposes efforts to include trash incineration as part of the CES. The burning of trash in Bridgeport should be phased out. Toxins released by trash incineration are linked to cancer, asthma, diabetes, learning problems, etc. People in Bridgeport should not have to carry the burden of breathing dangerously unhealthy air created by the incineration of trash imported from surrounding towns. He urges expanded investment in recycling and composting as the better alternative.	p. 1
Jason Morris	12/13/2012	Climate Change	Fossil fuel solutions are no longer acceptable for energy. This year we saw numerous heat records broken in the US, historic Arctic ice melt, and a metadata study of over 13,000 climate research papers collected over the past decade that show only 0.017% of scientists attribute climate change to non-human sources.	p. 1
Jason Morris	12/13/2012	Outreach	If CT raises corporate taxes up to competitive levels (currently, 5th lowest in the nation), the state can do more for education and pivot away from fossil fuels.	p. 1
Jason Morris	12/13/2012	RPS	"Clean" coal is not an option.	p. 1
Justin Paglino	12/12/2012	Climate Change	As a father and scientist, he hopes that DEEP will address the seriousness and gravity of climate change.	p. 1
Justin Paglino	12/12/2012	RPS	The state can (and must) throw the full weight of its collective efforts towards a rapid-as-possible switch to 100% renewable energy.	p. 1
Paula Panzarella	12/6/2012	RPS/Solar	The promotion of large-scale solar energy projects needs to be a major focus of CES. CT can learn from Germany regarding solar.	p. 1

Electricity Sector Comments				
Stakeholders	**Date Filed**	**Main Topic**	**Specific Issue**	**Page Cite**
Paula Panzarella	12/6/2012	RPS/GHG Emissions Reduction	For the past six years, she has been involved with Fight the Hike (an organization on electricity legislation and the electric costs for CT residents and small business consumers). She notes that thousands have petitioned Govs. Rell and Malloy. Overwhelmingly, they support clean, renewable energy such as solar and wind to lessen CO2 and other pollutants, and see these renewables as a way to reduce our costs by not being dependent on fossil fuel-burning technology.	p. 1
Roberta Paro	12/14/2012	Decoupling	Since decoupling has helped California keep its electricity use flat for 20 years, use of California as a case study would be beneficial for CT. Decoupling must happen for all utility companies in CT and not just as a pilot program. California's experience shows that decoupling works to keep energy use down.	p. 1
Roberta Paro	12/14/2012	RPS	Building our energy future around New England wind and solar would create 3x more jobs than basing energy future on fossil fuels.	p. 1
Roberta Paro	12/14/2012	Ratepayer Cost Components	TOU pricing must be implemented so CT could shave peak demand and balance loads. All utilities must be engaged in implementing TOU pricing.	p. 1
Roberta Paro	12/14/2012	RPS/Hydro	RPS should not include Canadian Hydro. The damage that has already been done to the land, wildlife, and way of life for First Nations Peoples should not be exacerbated by encouraging more large scale hydro. It is time for us to build an economy based on renewable energy that does not exploit one group of people for the betterment of others.	p. 1
Roberta Paro	12/14/2012	RPS/WTE	Opposes moving garbage incineration into the Class I renewable energy category. We should be working to create a culture that wants zero waste and takes action to make it happen. It is her understanding that we want to double and then triple our recycling rates.	p. 1
Roberta Paro	12/14/2012	Other Electricity Sector Comments	Would like CT residents to have the opportunity to participate in financing of renewable energy in the same manner as German citizens.	p. 1

Electricity Sector Comments				
Stakeholders	**Date Filed**	**Main Topic**	**Specific Issue**	**Page Cite**
Roberta Paro	12/14/2012	Outreach	Regarding Energize CT, people do not change behavior just because they get accurate information. Rather, they change behavior when they get accurate information and when they know someone else who made the change. See American Psychological Association for a study done in California on what stopped people from conserving energy. Do not waste money on information itself. Continue neighbor to neighbor. Ramp it up.	pp. 1-2
Lena Pavel	12/19/2012	RPS/Solar/Wind	There should be mass media education of how solar power and wind applications can be put to good use even on a very limited small scale in residential homes. Public interest will spark demand for these applications.	p. 1
Susan Peterson	12/17/2012	RPS/Hydro	On an ethical level, he struggles with the concept of getting cheaper energy courtesy of Hydro Quebec when it come with environmental and human costs. To help inform the decision process, final CES should include some sort of balance sheet or matrix that: (1) weighs pros/cons of each energy piece; and (2) includes external or out-of-state considerations with regard to social and environmental concerns.	
Barbara Schlein	11/28/2012	General	There should be far more emphasis on renewable energy, especially given the air quality issues around fossil fuels.	p. 1
Barbara Schlein	11/28/2012	Ratepayer Cost Components	It is inappropriate for CT to permit utility companies to raise rates to cover storm damages, damages which in many cases were avoidable by foresight and planning, or else come under the rubric of cost of doing business. If utility companies want CT to subsidize their expansion and repair, they should submit willingly to a much greater degree of control and regulation in the interest of public welfare and fairness to ratepayers.	p. 2
David M. Shenker	12/17/2012	RPS	Renewable energy is the way of the future, especially geothermal.	p. 1

Electricity Sector Comments				
Stakeholders	**Date Filed**	**Main Topic**	**Specific Issue**	**Page Cite**
Gary Steinman	12/13/2012	RPS/Wind	Supports development of expanded use of renewable energy sources. However, he has reservations about wind. Industrial scale wind turbines can have detrimental, even devastating effects nearby. They are very noisy, can throw off chunks of ice in the winter, their dynamic shadow profiles can create maddening strong effects, and are to some aesthetically displeasing. Believes CT does not have much uninhabited land where wind turbines would be better suited.	p. 1
Gary Steinman	12/13/2012	Reliability/Security	Has observed, including as an intern of CL&P, that utility companies in CT tend to disrespect the limits of permission they get from property owners regarding extent of trimming, to ignore local regulations, to carry out trimming carelessly, to blame failures attributable to lack of maintenance on trees not involved and to diminish properties by leaving them scarred in an ugly way. All of this amounts to corporate taking for quasi-public purposes without compensation for value lost by property owners and communities. Areas opened up by trimming tend to provide opportunities for invasive and hyper-allergenic plants to prosper. No one seems to take the responsibility to replant or otherwise mitigate the consequences of trimming.	p. 2
Gary Steinman	12/13/2012	Reliability/Security	There have been many discussions of late of pitting the desire to have all utilities moved underground against the claim that doing so would be prohibitively expensive. These discussions do not take a long-term strategy into consideration.	p. 2
John Stewart (Assoc. Professor at University of Hartford - Sociology & Environmental Studies)	11/20/2012	RPS/WTE	"Trash to energy" incinerators should not be classified as "renewable" energy because: (1) almost everything burned in these incinerators could have been recycled, which would be much more sustainable in the long run; and (2) these incinerators emit pollution, such as SO2 and particulate matter.	p. 1
Jamie Sylvester	12/6/2012	RPS/Hydro	Canada should not be entitled to tax incentives for its hydropower on the backs of CT ratepayers. That we're buying oil from their sands is bad enough.	p. 1

Electricity Sector Comments				
Stakeholders	**Date Filed**	**Main Topic**	**Specific Issue**	**Page Cite**
Jamie Sylvester	12/6/2012	RPS/WTE	Trash incinerators are not Class I renewable energy. They are in place to handle waste generated by the state. They are ill-managed. He believes that the public is neither educated about hazardous waste nor recyclable waste. If the state had an education program in place that is actively implemented, then CT might consider the Class I designation.	p. 1
Jamie Sylvester	12/6/2012	General/Health Concerns	CT's air quality is poor and getting worse. She lives in Torrington with asthma. CT's air quality should not be further jeopardized.	p. 1
Peter Tavino	11/14/2012	Ratepayer Cost Components	Northeast Utilities discourages ground source technology by using the Sandy Storm incident to raise electricity rates on citizens to pay for cleanup of improperly protected above-ground facilities. As ground source drilling and boring technology advance in CT, so too does the technology to place the state's electric wires below ground. DEEP and NU should be working with, not against, the local driller and excavating contractors.	p. 1
Peter Tavino	11/14/2012	RPS/Geothermal	CT is ideal for Ground Source energy, as installation costs continue to come down each year. Urges DEEP to follow the State Health Department model to update policy and regulation by bringing in an advisory committee with ground source representatives from the private sector.	p. 1
Nancy Urban	12/6/2012	RPS	CT should continue to support programs that are effective in helping citizens to lower energy costs and, at the same time, protect the environment. Renewables such as fuel cells, solar, wind and hydro should receive highest priority. CT should be phasing out items that pollute such as trash incinerators. These programs should not be farmed outside the state, but should be a source of business and jobs here in CT.	p. 1

Electricity Sector Comments				
Stakeholders	**Date Filed**	**Main Topic**	**Specific Issue**	**Page Cite**
Joseph Wasserman	12/12/2012	RPS	CT needs higher target goals for renewable energy. The world is running out of time in regard to global warming; we need to move towards wind and solar quickly.	p. 1
Joseph Wasserman	12/12/2012	RPS/WTE	Trash incineration is not an option. Remove it from the plan. Trash burning releases dangerous toxins and discourages recycling that saves the world energy and reduces GHG emissions. Recycling also creates many more jobs than trash incineration.	p. 1
Richard Watson	12/21/2012	RPS	Supports comments made by Judi Friedman. Suggests DEEP read the Earth Charter (earthcharter.org) when considering clean energy options.	p. 1
Richard Watson	12/21/2012	RPS/Solar	An energy strategy emerging from this century must include solar thermal water heating. A relevant and modern strategy would include a strong commitment to the expansion of solar electric and thermal technology, proven job creators, a way to expand the generation of solar vehicles, and local and safe form of microgrids.	p. 1
Richard Watson	12/21/2012	Reliability/Security/ Cyber	The CES does not consider the danger from storms like Sandy or cyber warfare both of which are distinct possibilities when we have large vulnerable and brittle grids. Microgrids are more reliable energy options.	p. 1
Richard Watson	12/21/2012	RPS/WTE/Hydro	Does not support WTE or Canadian hydro.	p. 1

Natural Gas Sector Comments

Stakeholders	Date Filed	Main Topic	Specific Issue	Page Cite
Penny Bacchiochi, State Rep 52nd District	12/6/2012	Increased NG Reliance	While the demand in the 52nd district for NG is huge, NG expansion must be done in a way that encourages and supports duel fuel capable systems and industries currently supporting CT's energy needs.	
Matthew Lesser, 100th District Representative, Connecticut General Assembly	12/21/2012	Increased NG reliance	CT needs to be cognizant of the fact that NG drilling carries social costs. As part of any roll out of expanded gas service, we should follow the lead of states like NJ and prohibit the importation of toxic fracking waste into this state. Banning the import of fracking waste would prohibit drilling states that have not yet adopted appropriate regulatory oversight from exporting the social costs of that lack of oversight. While there appears little likelihood of NG drilling in CT at present, we should consider adopting a moratorium on hydro-carbon hydraulic fracturing until such time as DEEP and DPH have been able to adopt an appropriate regulatory framework to protect public health. Additionally, homes and businesses that receive access to expanded natural gas service should be required to undergo energy audits and pursue basic efficiency measures in advance to minimize long term costs and the impact on rate payers. We should pursue full decoupling of natural gas to ensure proper incentives for gas efficiency measures.	

Natural Gas Sector Comments

Stakeholders	Date Filed	Main Topic	Specific Issue	Page Cite
George Jepsen, Attorney General	12/14/2012	Increased NG Reliance; NG cost/benefit analysis	Supports expansion of NG for residential and business customers. Given increasing ratepayer costs, DEEP should reconsider its Draft CES with a sharper focus on the costs and weigh those costs against the benefits of each strategy, including but not limited to the strategies associated with energy efficiency for consumers and industry sectors, electricity, peak demand, decoupling, and the build-out of the State's NG infrastructure. First, Additionally, for every program and strategy in the Draft CES, DEEP should establish a required pay-back period and make clear that it will not pursue any program or strategy that cannot meet that payback requirement. Ratepayers should not be required to fund any program or strategy if the savings from that program or strategy will not recover its costs within the defined period of time. Finally, DEEP should set an overall cap on the increase in utility rates associated with the costs of the programs in strategies in the Draft CES, measured either in total dollars or in a percentage increase in rates.	
Noel Bishop, first selectman, Westbrook	12/13/2012	NG Infrastructure Expansion	Supports expansion	
Richard Moccia, mayor, Norwalk	12/13/2012	NG Infrastructure Expansion	Strongly supports the CES initiatives offered to expand use of NG	
Daniel Welch, Chairman New Canaan, Utility Commission	12/12/2229	NG Infrastructure Expansion	encourage utility companies to build new mains and infrastructure for target customers. We would also support private market financing options to speed conversions from oil heat, combined with extended payback periods or rate flexibility for new construction and hookups. Rate flexibility in particular could increase conversions and effectively use some of the economic price difference between gas and oil to pay for new construction costs.	
Anthony J. Daros, Branford Board of Selectmen	12/12/2012	NG Retail Choice	Supports the CES goal to enhance retail choice	

Natural Gas Sector Comments

Stakeholders	Date Filed	Main Topic	Specific Issue	Page Cite
Clean Energy Finance And Investment Authority (CEFIA)	12/14/2012	natural gas retail choice	CEFIA mentions 2 specific ways that it can help support efforts to expand natural gas choice, including: EE loans and exploring the viability of greater use of district energy systems.	
Office of Consumer Counsel	12/21/2012	Increased NG Reliance; NG Infrastructure Expansion	DEEP will need to work with ISO -NE, EDCs, and possibly generating companies to ensure that gas expansion does not create unreasonable electric reliability risks or unreasonable increases in electricity prices in the time before major expansion of pipeline capacity occurs. A gradual approach should be taken in relation to giving CT citizens the ability to choose NG in order to track: 1) winter impacts on electric reliability; 2) benefits of heating bill reductions as compared to increased electric bills that may result from NG use; 3) the activities in other NE states to increase their own NG use.	DEEP
Public Utilities Regulatory Authority (PURA)	1/24/2013	General	Draft CES has potential to generate uneconomic investments that would ultimately cost ratepayers more for service than they currently pay. Many of draft CES's proposals rely on suppositions that need to be rigorously measured on several levels for the strategy to be successful.	p. 1
Public Utilities Regulatory Authority (PURA)	1/24/2013	General	PURA has issued discovery requests to the EDCs and LDCs in effort to evaluate the proposals contained within draft CES and the impact on ratepayers.	p. 1
Public Utilities Regulatory Authority (PURA)	1/24/2013	EE Expansion Costs	CES does not provide details of what portion of the electric conservation budget could be achieved through the leveraging of private capital. Having access to such capital should be established prior to any increase in conservation funding to limit the potential of additional ratepayer funding.	p. 2

Natural Gas Sector Comments

Stakeholders	Date Filed	Main Topic	Specific Issue	Page Cite
Public Utilities Regulatory Authority (PURA)	1/24/2013	Air Quality Issues	As stated in draft CES, regional coordination and federal regulation to phase out dirty power plants within and beyond CT's borders is needed to address effectively CT's air quality issues. While PURA acknowledges the need for clean energy investments, they will come at a price of higher rates to ratepayers. Matching the benefits with the costs is critical.	p. 2
Public Utilities Regulatory Authority (PURA)	1/24/2013	Renewables Expansion	PURA is concerned with a rapid expansion of in-state renewable resources while at the same time participating in regional collaboration. It is important that a comprehensive and impartial cost-benefit analysis precede any further ratepayer commitment to renewable energy projects to ensure the estimated impact on customers is understood prior to investment in a strategy.	p. 3
Public Utilities Regulatory Authority (PURA)	1/24/2013	NG Expansion	The proposed expansion of new natural gas mains and the addition of new firm customers would have an impact on all natural gas ratepayers who would pay for the expansion through increases to their bills. DEEP should provide greater emphasis on converting on-main customers that are not currently receiving gas service. DEEP should explore the coordination of the different utility companies, state and municipal agencies, and pipelines to facilitate the resolution of any issues or conflicts that may arise regarding the proposed expansion.	p. 3
Public Utilities Regulatory Authority (PURA)	1/24/2013	NG Expansion	Draft CES's analysis of the natural gas expansion did not include increases for reliability investments to the gas distribution systems, the cast iron steel replacement programs, normal capital investment increases, and other typical capital investment or expense increases. The expansion of infrastructure will necessitate an increase in the workforce that is involved with designing and constructing said infrastructure.	

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Public Utilities Regulatory Authority (PURA)	1/24/2013	NG Expansion	It is imperative that the safety of the natural gas system be given the highest priority. The expansion must not impact their replacement programs or related regulation of natural gas distribution systems requirements.	
Public Utilities Regulatory Authority (PURA)	1/24/2013	NG Expansion	The impact of the expansion plan on participating and non-participating customers will be a function of the total capital and cost of providing service to new customers, the level of customer participation, contributions-in-aid-of- construction from participating customers as a result of any Hurdle Rate model analysis and rate design changes that may be made to both participating and non-participating customers to help fund the necessary investments.	
Joint Statement From 11 Enviro Groups and Other NGO's	12/21/2012	Natural Gas Infrastructure Expansion	Concerned with the emphasis on investing in NG infrastructure compared with investments in EE and renewables in the Draft. In evaluating the costs and benefits of building out mains, EE must be taken into account from the outset. DEEP should develop policies to give heating oil customers a full range of choices for reducing heating costs, including EE improvements and the use of residential ductless or geothermal heat pumps. NG conversions for customers on gas mains should require efficiency of both the heating equipment and the building envelope.	
Marlene, **ABC Fuel**	12/11/2012	Increased NG Reliance	CT should not be seeking to save taxpayer money by promoting NG. Instead the state should crack down on state employees who use state vehicles for personal use. Also, the commenter states she shouldn't have to be afraid to close her eyes at night or walk in any room of her house and flip a switch, for fear of blowing up, because her neighbor decided to convert to NG.	
Algonquin Gas Transmission/Spectra Energy Corp.	12/18/2012	NG Infrastructure Expansion	Believe the Draft appropriately reflects the benefits that can be realized from addition of NG infrastructure	

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Richard Paglia, **Algonquin Gas Transmission, LLC and Spectra Energy Corp.**	11/20/2012	Increased NG Reliance	Offers general support for the CES NG expansion target	
Amanda DeRisi, **AmeriGas**	12/14/2012	NG Retail Choice	disagrees w/ the draft strategy's plan to subsidize natural gas conversion	
Peter Aziz, **Bantam Fuel**	12/14/2012	Natural Gas Expansion	President of Bantam Fuel. He employs 55 people. Statewide the industry employs 13,000 people. There will be job losses if the CES strategy is implemented. These people will not find green jobs.	
Peter Aziz, **Bantam Fuel**	12/14/2012	NG cost/benefit analysis	the key component of natural gas is methane. Methane is 20 times more powerful greenhouse gas than carbon. Once methane leaks into the atmosphere it remains there for approximately 9 to 15 years. Old gas lines leak methane into the environment. The plan has a price tag of $6.8 billion. The utilities should have shareholders pay for this.	
Peter Aziz, **Bantam Fuel**	12/14/2012	Price Projections	Future energy prices cannot be predicted. Once gas is exported its likely the price will rise. Oil has historically been cheaper.	
The Berkshire-Litchfield Environmental Council	12/13/2012	Increased NG Reliance	The home heating oil businesses will be adversely impacted by the preferential treatment of NG. For the money that taxpayers spend on the front side and what ratepayers may pay on the backside, those same dollars might be better spent on simply upgrading everyone's furnaces to more energy efficient models.	
The Berkshire-Litchfield Environmental Council	12/13/2012	NG infrastructure expansion; NG cost/benefit analysis	Given severe fiscal constraints into the foreseeable future, and the untested/ inherently conflicted Green Bank concept, CT should question investing in new infrastructure for such an uncertain, theoretical return, especially when the true aim is to transition to renewable energy sources. The Draft should properly address the tradeoffs: environmental disruption in laying that much pipeline, and the increased state regulatory oversight required afterward.	

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Andrew Tatakis, **Blu Energy**	12/21/2012	Natural Gas Infrastructure Expansion	Form Letter #??	
Paul Ciavarelli, **Branchville Oil**	12/13/2012	NG Infrastructure Expansion	He is a third generation oil dealer. Should not favor one industry over another. Oil has historically been cheaper. When gas is on the world market, the price will rise. The notion that 10,000 jobs will be created is false. Most of those jobs will be from out of state workers. Do not help utilities that do not maintain their gas lines or power lines.	
Clean Water Action	12/21/2012	Increased NG reliance; natural gas infrastructure expansion	DEEP needs to recommend packages of solutions rather than pick NG as a winner. There should be a level playing field for on-bill repayment of many measures, not just pipelines and new NG heating systems. DEEP should analyze the total customer savings from efficiency and gas conversion together, rather than conclude that efficiency investments worsen the economics of a gas conversion. DEEP should require that any loans for NG equipment be required to meet stringent efficiency standards to be eligible for state facilitated financing. Opposed to extending financing of NG infrastructure past 15 years as whether NG will be available and at a competitive price is unknowable.	
Kenneth Berlin, VP, **Coalition for Green Capital**, Washington DC	12/14/2012	NG cost/benefit analysis	Wants CEFIA to administrate on-bill repayment programs and low-cost credit enhancements for asset-backed securities to drive down capital costs through securitization.	
Guy Wanegar, President, **CT Geothermal Assn.**, Rocky Hill	11/27/2012	Increased NG Reliance	Objects to natural gas and objects to Canadian Hydro. Wants renewable sources, including geothermal, supported.	
Connecticut AFL-CIO	12/13/2012	Increased NG Reliance	Conveys overall support for the plan	
Eric J. Brown, **CBIA**	12/19/2012	Increased NG Reliance	Draft should propose more diverse fuel sources, various fuel sources and renewable technologies as well as a means of "back-up" in an event of an interruption.	
Eric J. Brown, **CBIA**	12/19/2012	Increased NG Reliance	Submits overall support for the CES plan to expand NG use and states that	

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Eric J. Brown, **CBIA**	12/20/2012	NG Infrastructure Expansion	Connecticut must take full advantage of opportunities to access nearby, long-term supplies of natural gas.	
Connecticut Construction Industries Association, Inc.	11/20/2012	Increased NG Reliance	Overall support for the CES NG plan	
Connecticut Economic Resource Center, Inc.	11/16/2012	Increased NG Reliance	Increased use of NG can improve CT's economic development and improve the environment. New infrastructure is taxable property that will bring revenue to struggling towns.	
Connecticut Fund for the Environment	12/20/2012	Increased NG Reliance	The proposed expansion of natural gas usage must be properly designed to be consistent with our short-term and long-term environmental and economic goals. Conversion from heating oil to natural gas can provide reductions in greenhouse gases and local pollutants. With this in mind, conversion of homes and businesses already located on natural gas mains is a sensible step to take. Beyond this, any planning process to invest in new natural gas infrastructure must include a full evaluation of the relevant economic and environmental risks, particularly when compared to other strategies such as energy efficiency.	
Connecticut LDCs	12/21/2012		The LDCs offer 4 specific recommendations to increase the chances of successful NG expansion: 1) strengthen new project evaluation guidelines (hurdle rate model); 2) Implement a new rate design to fund system expansion; 3) support implementation of new customer financing options by the LDCs; and 4) the support of LDC capacity acquisitions is necessary to ensure sufficient flexibility and reliability exists in portfolio to meet firm growth scenarios.	

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Connecticut Roundtable on Climate and Jobs	11/28/2012	Increased NG Reliance	Have concerns about the CES proposal to invest in the expansion of NG infrastructure. Recognizing the amount of methane released during the extraction and transmission of NG, DEEP should quantify the GHG pollution impact of the proposal over the investment lifetime of the projects and compare that impact with alternative investments.	
John Harrity, President, **CSCM Union**	12/11/2012	Multiple CES topics: cross-file	Has concerns re transmission regarding Canadian Hydro power; supports investment for in-state fuel cells; reservations regarding fracking; supports more investment in conservation measures.	
Conservation Law Foundation	12/21/2012	NG cost/benefit analysis	The extent of GHG emissions attributable to gas use in Connecticut should be further developed in the final Strategy, which should also include details on the extent of adverse environmental impacts or potential mitigation strategies. Simple back of the envelope calculation would suggest that building 50-100 year pipeline infrastructure, with the associated emissions from natural gas use will ultimately be contrary to the requirements of the GWSA in the future, in the absence of additional emission reduction/mitigation measures applicable to gas infrastructure and use. The final Strategy needs to provide a more thorough analysis of the various public policy considerations and a more robust accounting of costs versus benefits (including implementation of all cost effective energy efficiency measures) if cost-offsetting incentive recommendations are to be implemented.	
Cromwell Energy	11/14/2012	Increased NG Reliance	Disagrees with the "all-in" strategy the CES promotes since it's impossible to predict the future price of NG. The CES also doesn't consider the environmental impact of NG consumption.	
Marc Hanks, **Direct Energy Services**	7/31/2205	NG Retail Choice	Wants retail decoupling for natural gas & supplier choice	

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Dominion Retail Inc.	12/21/2012	NG Retail Choice	CT would benefit from offering a properly designed NG choice program where supplier offerings could better meet individual resident needs and provide financial savings. To help remove institutional "roadblocks," to a residential choice program, CT should look at one of the many industry models that could be reviewed for their applicability to CT's situation.	
Henry Link, **Enviro Energy Connections**, Hartford	12/10/2012	Multiple CES topics: cross-file	Supports expansion of natural gas, but at gas company shareholder expense; supports microgrids; does not want RPS definitions changed; supports surcharge on fuel oil to fund efficiency; supports AEIH at UCONN; supports decoupling; supports sub-metering; support CHP; supports building energy ratings; supports ISO-NE participation; supports expanding funding for HES.	
Environment Connecticut	12/11/2012	Increased NG Reliance; natural gas infrastructure expansion	Agree with the Draft's assessment that Segment A consumers should have access to financing to convert, but strongly oppose using limited state resources to promote expansion beyond existing NG infrastructure. The Draft does in fact pick a winner by placing such a huge investment in NG which ultimately shifts our dependence from oil to another fossil fuel. Finally, the environmental impacts of NG are understated and conversion may not be more environmentally beneficial than purported.	
Direct Energy	12/21/2012	NG Retail Choice	CT will benefit greatly from a well designed residential gas choice program, which need not be overly complex or costly to administer. With 17 states operating residential gas choice programs, there is an extensive track record of market designs available for review to insure an efficient and reliable program in the state. The competitive market can enhance the CES goals by bringing more NG into Connecticut and by contracting for capacity in addition to capacity commitments made by the distribution utilities, as the pipelines conduct their open seasons.	
Gault Energy, Employees	12/21/2012	Natural Gas Infrastructure Expansion	Form Letter #?	

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Tom Burns, **Green Jobs Partnership**	12/14/2012	Increased NG Reliance	NG expansion creates a number of opportunities for green job creation, but to fully leverage opportunities CT should: enhance workforce and training policies to support green jobs, build on existing partnerships with businesses to promote greening of occupations and increasing green jobs employment, and continue to follow and integrate efforts by the state and federal government to define and quantify green jobs.	
Wayne Cobleigh, manager, **GZA Geoenvironmental**	12/14/2012	NG Infrastructure Expansion	Wants DEEP to support geothermal for areas outside of the gas infrastructure expansion areas with financial incentives	
Kate Donnelly, Chair, **Hampton Green Energy Committee**	12/21/2012	Increased NG reliance	Profoundly disappointed that the proposal relies so heavily on expanding natural gas in our state. I believe the cornerstone of the strategy should be for energy efficiency, and beyond that the development of renewable energy for our state.	
Jacqueline Booth, **Home Town Energy**, Brooklyn, CT	11/20/2012	NG infrastructure expansion; Price Projections	Objects to government support for natural gas expansion and disagrees with CES price projections.	
John Fernandez, Bus Mgr., **IBEW Union**	12/14/2012	General support for CES	Supports CES based on economic stimulus	
IGS Energy	12/21/2012	NG Retail Choice	DEEP should include in its NG sector strategy a commitment to work towards developing retail NG choice for CT consumers. Any pilot program should include all of the customers in one of the three large NG utilities (Connecticut Natural Gas Corporation, Southern Connecticut Gas Company, and Yankee Gas Services Company). Metrics for evaluating the success of any such pilot program account for the fact that many suppliers will choose not to enter the market until a threshold number of eligible customers is met.	
Craig Metz, **International Union of Operating Engineers**	12/13/2012	Increased NG Reliance	Supports the CES plan to increase transmission pipeline and gas distribution lines to increase NG consumption.	

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Bill Leahy, **Institute for Sustainable Energy**	12/11/2012	Increased NG Reliance	The plan should recommend a study to modify the formula so that the cost of main extensions is not the sole responsibility of a customer requesting service or the anticipated revenue of that customer alone. The formula should consider "cluster add-ons", which are revenues anticipated from new customers likely to connect to natural gas once the main extension is completed. In addition, a subsidy for main extensions should be created to encourage and compensate the distribution companies for the societal benefits of reducing our dependence on foreign oil and lower state emission levels. The Draft should also consider B20 as an alternative.	
William Upholt, **Interreligious Eco-Justice Network**	12/10/2012	Increased NG Reliance	The Draft should focus more on ways to reduce energy consumption and less on promoting NG. NG is not a long term solution.	
Iroquois Gas	12/10/2012	NG Infrastructure Expansion	Infrastructure expansion can be done in a cost-effective way by utilizing several methods such as re-deployment/re-packaging of existing assets, offering of access to additional sources of supply, and adding compression to existing pipelines	
Deborah Todd, **Kaufman Fuel Oil**	12/21/2012	Increased NG Reliance	Form Letter #?	
Bob Katzman, **Krall Oil**	12/13/2012	NG Retail Choice	CT should not subsidize NG industry, especially in difficult economic times.	
Angela Carroll, **Madison Oil Company**	12/12/2012	Price Projections	competition is the key driver to lowest possible costs and no one can predict where prices will be in the future. CT should pursue energy policy that promotes competition, fuel diversity and fuel neutrality	
Frank J Johnson, President, **Manufacturing Alliance of CT**	11/30/2012	NG Infrastructure Expansion	Supports expansion and wants to devise a method for expediting the permitting process for pipelines/delivery systems both intra and interstate.	

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Shelby Neal, **National BioDiesel Board**	12/10/2012	research sources	Disagrees with the Draft assumption that "fuel switching (from heating oil to natural gas) would bring environmental gains, lowering emissions of federally-regulated pollutants such as SOx, NOx and particulate matter." This statement is based on outdated information and has become fundamentally incorrect. New research shows that ultra-low sulfur heating oil is actually cleaner than NG.	
National Energy Marketers Association	12/21/2012	NG Retail Choice	NEM urges that the concept of "gas choice" in the draft be expanded to encompass more than just the choice of using NG as a fuel type, to also include the choice of NG supplier. Competitive retail suppliers have been serving electric consumers in CT for many years. The confluence of favorable events in the draft all argue in favor of providing consumers with the choice of NG supplier as well.	
National Federation of Independent Businesses	12/21/2012	Increased NG Reliance	Small business owners are split over whether NG expansion is positive or negative. However both sides think that anticipated savings are only speculative and dependent on ever changing market conditions.	
Michael Trunzo, President, **New England Fuel Institute**, Waltham, MA	12/12/2012	Increased NG reliance; Price Projections	Opposes the state "picking winners & losers" by supporting natural gas expansion. Disagrees with CES price projections. Also disagrees that natural gas is a clean energy source.	
Martin Orio, President, **New England Geothermal Professional Assn.**	11/29/2012	NG Infrastructure Expansion	Objects to government support for natural gas expansion and wants support for geothermal.	
Julie D. Kohler, **North American Power and Gas**	12/13/2012	NG Retail Choice; Capacity Release and Storage	Provides recommendations to establish unbundling for residential natural gas customers, including: 1) establishing a collaborative to use existing Tariffs, gas transportation and operating procedures, codes of conduct, etc. to expand retail choice, 2) compare practices held in common between CT's electric and NG market, 3) review best practices from other states that have unbundled NG, and 4) revise existing Tariffs, including Capacity Release Service, and identify incremental cost to accommodate 100% residential choice.	

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Thomas Kiley, **Northeast Gas Association**	12/12/2012	NG Infrastructure Expansion	Supports NG. CT should encourage infrastructure expansion.	
Clay Bassett, **Northfield Fuel**	12/12/2012	NG Retail Choice	Government should stay out of the private business arena of energy. Thinks that CT is forcing people to switch to natural gas.	
NRG Energy Inc.	12/14/2012	Infrastructure	CT pipeline infrastructure must be evaluated for increased natural gas usage.	
Judi Friedman, Chair, **People's Action for Clean Energy**, Canton	11/26/2012	Increased NG Reliance	Opposes use of fossil fuels and non-renewables. Wants wind, solar and geothermal.	
Judi Friedman, Chair, **People's Action for Clean Energy**, Canton	12/21/2012	Increased NG Reliance	NG expansion is NOT a progressive solution. We have now learned that over the expected lifetime of each of PA's fracking wells, companies may use as many as 9,000,000 gallons of water, and 100,000 gallons of chemicals and radioactive isotopes within a four-week period. Fracking is also believed to have been the cause of hundreds of small earthquakes in Ohio and other states. If gas follows the trend of other non-renewables, it would be more difficult for consumers to make large-scale changes to truly clean energy in a lifetime.	
Marianne Horn, member; **People's Action for Clean Energy**, Bloomfield	12/9/2012	Increased NG Reliance	Opposes use of fossil fuels and non-renewables. Wants wind, solar and geothermal.	
Chester Scoville Jr., **Plymouth Oil Company, Inc.**	12/16/2012	NG Infrastructure Expansion	This plan for Natural Gas as a primary source is ridiculous. Let the Gas company figure out their leaking pipe issues first and make our state safer.	
Joseph Rose, **Propane Gas Assoc. of New England**	12/11/2012	Increased NG Reliance	CT should have a plan that focuses less on NG and instead offers options like propane.	

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Tom Wemyss, **PurePoint Energy**	11/14/2012	Increased NG Reliance	DEEP needs to take a look at the hidden social cost of using NG. These hidden costs include health and environmental costs. If health care or other environmental costs increase due to an increase of carbon emissions etc…, that additional cost should be tagged to the offending polluter. Only once the true cost of energy is presented can an accurate decision be made between energy technologies.	
Don Phillips, owner, **Quinoco Energy**	12/19/2012	NG Infrastructure Expansion	Opposes gas expansion	
Scott Hedderich, **Renewable Energy Group**	12/14/2012	Increased NG Reliance	The Draft ignores its own data to project support for a potentially risky strategy of growth in natural gas in all sectors of Connecticut at the expense of every other energy source. If the recommendations of the Draft were to be implemented not only would the state see an increase in natural gas use in electricity generation, but also heating and transportation sectors. The Draft fails to adequately account for the price response this significant increase in demand would trigger. In fact, the Draft does state, "it is important to understand the risks involved in a large-scale conversion strategy. As noted above, future prices can never be forecast with absolutely certainty. Natural gas prices could rise unexpectedly," yet the Draft moves forward with a wide scale support of the increased in natural gas usage.	
Retail Energy Supply Association	12/21/2012	NG Retail Choice	DEEP should, as part of the CES, recommend appropriate legislative and/or regulatory changes that would allow NG choice for customers.	
Rivers Alliance of Connecticut	11/25/2012	RPS/Hydro	The recommendations regarding fracking: 1) Follow the example of Vermont and put a moratorium on in-state fracking for gas until protective practices and regulations are developed. 2) Ban injection of fracking waste from other states into CT soils.	
Gary Steinman, **Roxbury Conservation Commission**, Roxbury	12/13/2012	Multiple CES topics: cross-file	Opposes wind as an energy source; supports transit-oriented development; ambivalent of expansion of natural gas; has concerns regarding cavalier tree trimming	

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Susan Rowan, **Rural Gas Company**	12/12/2012	NG Retail Choice	If the CES plan is implemented there will be sever job losses in the fuel oil and propane businesses. Her family owns the Rural Gas Company which has been in business for over 60 years. Propane is an approved clean fuel and is the world's most used alternative fuel. Propane exceptionally well competes well with gasoline and diesel powered vehicles.	
Thomas Santa, **Santa Energy Corp**	12/12/2012	Increased NG reliance; natural gas infrastructure expansion	Let the free market work to allow customers to benefit from low natural gas prices. The cost of any infrastructure expansion should be borne by the user. Finally, the uncertainty of forecasts makes the compelling case that change should be left to the market.	
Al Breda, **Sippin Energy Products**	12/11/2012	Price Projections	Efforts should be focused on creating customer incentives on a tiered scale depending on the degree of energy efficiency that will be gained. The assumption by the DEEP that new conversions will be performed with the most efficient equipment available is not correct in the real market, therefore the estimated savings by consumers will be much less than expected.	
David Cohen, Executive Vice President, **Standard Oil of Connecticut**	12/14/2012	Hurdle rate/CIAC policies	Another flawed assumption is the 5% hurdle rate which is the number used to arrive at the favorable net present value calculations that make this plan look like a good “investment”. The 5% hurdle rate is artificially low. Later on, the plan assumes that financing costs would be around 8%. The hurdle rate should reflect the financing costs and therefore, the proper hurdle rate is really 8%. If the 8% hurdle rate were used, the $3 billion cost to convert would be a very bad investment.	
David Cohen, Executive Vice President, **Standard Oil of Connecticut**	12/14/2012	Increased NG reliance; Price Projections	The first major flaw is that natural gas prices will remain at these very depressed levels and only increase by 2% per year. Next, the true numbers are that over 75% of commercial buildings and over 95% of industrial buildings are using natural gas.	
John Mahony, VP, **Standard Oil**, Bridgeport	12/14/2012	NG Infrastructure Expansion	Strong opposition. Does not want state to fund expansion.	

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Mark Beers, **Superior Plus Energy Services**	12/21/2012	Increased NG Reliance	Form Letter #?	
James Watson, General Manager, **Superior Plus Energy**, Torrington	12/13/2012	NG Infrastructure Expansion	Unfair to subsidizing one energy source with public funding or to force collection of income from existing ratepayers	
TCM Technologies	12/10/2012	NG Infrastructure Expansion	TTM manufactures Printed Circuit Boards for the aerospace industry and employs over 600 people in CT. They support natural gas expansion. Switching to natural gas can produce significant savings through reduced operating costs and lower cost energy. These savings will lead to further job creation. It is a well thought out strategy.	
Wilton Energy Commission	12/12/2012	Increased NG Reliance	Offers over all support for the Draft's NG expansion plan.	
David Parmelee, **Wepco Plastics**	2/20/2232	NG cost/benefit analysis	Wants rebates or compensation for switching from Oil burning heat to Propane.	
Lisa Cornish, **Warren Corporation**	12/5/2012	NG Retail Choice	Supports natural gas expansion. The CES lays out a path that will provide a choice for our states' energy consumers. Customers and the market will make the ultimate decision whether or not to switch heating fuels, but this will liberate citizens who now have no choice.	
Form Letter #1	12/10/2012	NG Infrastructure Expansion	Tax dollars should not be used to expand NG lines and subsidize conversion from oil or propane	
Form Letter #2	12/7/2012	Increased NG Reliance	The CES goal of switching 300,000 customers to NG doesn't take into consideration the infrastructure limitations and price increases as the US becomes an exporter of NG	
Form Letter #3	12/12/2012	Price Projections	Competition is the key driver to lowest possible costs and no one can predict where prices will be in the future. CT should pursue energy policy that promotes competition, fuel diversity and fuel neutrality	
Form Letter #4	12/14/2012	NG Retail Choice	Disagrees w/ the draft strategy's plan to subsidize natural gas conversion	

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Form Letter #5	11/30/2012	Increased NG Reliance	The CES proposal is not well thought out as it in its impact on jobs and unreliable price projections. CT should adopt a fuel-neutral plan and create more consumer awareness about propane.	
Form Letter #6	11/30/2012	NG Infrastructure Expansion	Strongly supports the CES initiatives offered to expand use of NG due to environmental, economic, and reliability benefits.	
10 Connecticut Residents	12/21/2012	Increased NG reliance	Concerned about the strategy's over-reliance on expanding NG pipelines as a way to help people reduce heating oil use, including expansions which aren't economically justified. NG drilling has serious environmental consequences and burning NG contributes to global warming. With gas prices sure to rise in coming years we need a plan to make homes and buildings more efficient instead of simply making an inefficient oil-heated building into an inefficient gas-heated building. To conserve NG, DEEP should require homes seeking incentives and financing for gas conversion to install the highest-efficiency equipment and meet the state's definition for weatherization. DEEP should allow improvements like insulation to be financed at the same time as new natural gas heating systems.	
76 Connecticut Residents	12/21/2012	Increased NG reliance	The plan must set us on a course toward a clean energy future that is free from the price swings and environmental impacts of natural gas.	
Carol and August Alegi	12/11/2012	NG Infrastructure Expansion	Supports CES plan to expand natural gas infrastructure to enable residential conversion to a cleaner, cheaper, more abundant and reliable fuel	
James Babcock	12/11/2012	Increased NG Reliance	CT needs renewable energy project stimulus where the benefits are exponential; this policy yields very weak projections because of supply volatility both short and long-term.	
Barbara Sterling Backman	12/21/2012	Increased NG Reliance	NG is not clean energy	

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Sarah Baird	12/12/2012	NG Infrastructure Expansion	The expansion of natural gas infrastructure involves environmental and economic risks. Some expansions which would convert homes already on main lines make sense but infrastructure expansions are not worth pursuing due to cost and environmental risk.	
Anthony Baldwin	11/23/2012	Increased NG Reliance	CT should not support the expansion of NG which will encourage and increase the use of fracking. Instead CT should invest in expansion of renewable resources like solar and wind.	
Judith Barry	12/17/2012	Increased NG Reliance	The Draft's proposal to promote NG conversion would displace hundreds of oil company employee's.	
Lynne Bennett	12/14/2012	Increased NG Reliance	There is over-reliance on natural gas. There should be more emphasis on renewables.	
Trevor Biggs, resident, Connecticut	12/13/2012	Increased NG Reliance	concerned with the lack of information detailing how the state would respond to malfunctions with natural gas, such as a pipe leak or an accident in transportation	
Jim and Jacqueline Booth	12/11/2012	Increased NG Reliance	oppose the NG expansion part of the draft because it subsidizes huge NG "monopolies."	
Robert Botelle	12/13/2012	Increased NG Reliance	CES over-relies on NG rather than promoting the development of renewable energy	
Brian Bouchard, Bouchard Fuels	12/13/2012	Increased NG Reliance	subsidizing the NG industry will put many small companies out of business.	
Barbara Brown	12/17/2012	Increased NG Reliance	CT should be conservative and wait for fracking's real impact to be thoroughly evaluated before relying so heavily on NG. Renewables should be the focus instead.	
Becky Bunnell	12/12/2012	Increased NG Reliance	CES over-relies on NG rather than promoting the development of renewable energy	
James Matthew Callahan, Naugatuck	11/23/2012	NG Infrastructure Expansion	Supports expansion into downtown Naugatuck	
Dave Cappello	12/18/2012	Increased NG Reliance	The Draft's focus on NG doesn't create the fuel diversification that CT needs. Look to integration of more renewables to create the necessary mix.	
Kris Carpenter, resident, Monroe	11/28/2012	NG Infrastructure Expansion	Supports expansion	

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David Chu, resident, Middletown	12/12/2012	NG Infrastructure Expansion	opposes expansion and concerned about lack of pipeline capacity and future price volatility and against the idea of utility ratepayers paying for other people to access gas	
Kim Craven	12/14/2012	Increased NG Reliance	Advancing the use of NG will further jeopardize our population, our environment, our air and water, and tarnish our state reputation as a go-to destination for businesses and families.	
Frank DeMatteis	12/18/2012	Increased NG Reliance	Likes solar and wind power approach	
Bernadette Dostaler	11/19/2012	Increased NG Reliance	Disagrees w/ CES proposal to increase use of NG due to safety reasons and unfairness of subsidizing one fuel over another. Instead CT should look into something useful like helping homeowners afford more energy efficient oil furnaces, controlling the exorbitant cost of electricity in this state (one of the highest in the country) and using state money to expand solar power, in private and public buildings.	
Robert Edmonds	12/12/2012	NG Infrastructure Expansion	Supports CES plan to expand natural gas infrastructure to enable residential conversion to a cleaner, cheaper, more abundant and reliable fuel	
Steven Everson, resident, Trumbull	12/14/2012	NG Infrastructure Expansion	Adamantly against the use of tax dollars (i.e.. state bonds, appropriated dollars, etc.) to be used to expand natural gas lines and subsidize the conversion from home heating oil or propane to natural gas	
Steven Farnham, resident, Watertown	12/14/2012	NG Infrastructure Expansion	The state of CT should not be involved with the natural gas companies to help them expand. Please suggest that that the state of CT stay out of this	
Stephanie L. Fernandez-Copeland	12/20/2012	Increased NG Reliance	CES should show more support for other utilities, small business and customers.	
Melinda Fields	12/12/2012	Increased NG Reliance	Heavy reliance on natural gas is a short-term, not a long-term solution. We need to put policies in place that foster and support the growth of sustainable energy solutions and businesses and encourage citizens to opt for those solutions (rather than investing in natural gas) through tax credits and other incentives.	

Natural Gas Sector Comments

Stakeholders	Date Filed	Main Topic	Specific Issue	Page Cite
Daniel Fischer	12/18/2012	Increased NG reliance	CT should not expand the role of NG. In 2010, six workers died from a natural gas explosion in Middletown, Connecticut where I was living and going to school at the time. Is this really the future that Connecticut wants?	
Lela Florel, resident, Bridgeport	12/14/2012	Increased NG Reliance	Opposes use of natural gas based on environmental concerns. Wants non-fossil clean energy used.	
Carl Fortuna, Jr., Town of Old Saybrook	12/14/2012	NG Retail Choice	Supports the CES goal to enhance retail choice	
Ted Giannitti	12/11/2012	NG Infrastructure Expansion	In no circumstance should the State act as the financial arm of the Gas companies, and do so by taking on additional debt. Nor should existing gas customers shoulder any of this cost.	
William Glickman	12/13/2012	Increased NG reliance	More emphasis should be placed on converting to renewable resources. The environmental implications of NG extraction minimize the attractiveness of this fuel source.	
Aaron Goode	12/5/2012	Increased NG Reliance	NG should be used as a bridge fuel only	
Cate Grady-Benson	12/12/2012	Increased NG Reliance	CES over-relies on NG rather than promoting the development of renewable energy	
Edward Granfield	12/18/2012	Increased NG Reliance	Strongly disagrees with CES plan, states that plan is focused on NG only	
Girad and Grace Hayes	12/18/2012	Increased NG Reliance	A stronger HES program towards heating oil and propane users; encourage renewable energy produced in-state	
Girad and Grace Hayes	12/18/2012	Increased NG Reliance	Rather than emphasizing NG, CT should create a stronger HES program for heating oil and propane users; encourage renewable energy produced in-state	
Jeff Howard	12/20/2012	Increased NG Reliance	DEEP should look beyond the fight over which fossil fuel should dominate in CT. Instead, the crucial distinction DEEP should be making is between policies that support continued reliance on fossil fuels and policies that support RE and efficiency.	
Michael Jedd	11/26/2012	Increased NG Reliance	supports NG use expansion, but notes that for many people the difference between the cost to convert to NG and replacing an oil furnace dramatically outweighs the return on investment.	

Natural Gas Sector Comments

Stakeholders	Date Filed	Main Topic	Specific Issue	Page Cite
Andy Kaplan - ratepayer	11/29/2012	Increased NG Reliance	Strongly supports the CES initiatives offered to expand use of NG due to environmental, economic, and reliability benefits.	
Jill Kelly	11/25/2012	Increased NG Reliance	The Draft fails to address the water pollution caused by fracking. Also disagrees with the Draft's plan to have the state pay for the cost of conversion to NG, while still expecting people to pay for conversion to renewables in the near future. The Draft should promote the conversion to renewables now. It seems a foolish and wasteful intermediate step when we could be putting all of our efforts into renewables we know will succeed.	
Mitch Kennedy	12/21/2012	Natural Gas Infrastructure Expansion	Natural Gas infrastructure should be targeted around major local methane sources, as these are permanent known and quantifiable resources. While the Marcellus Shale gas is transient, at best. The USGS recently (Jan 2012) downgraded the yield estimates of the MS formation by 66% - down from 18 years of reserves to 6 years. These were also based upon 2010 natural gas consumption levels, not current or anticipated – meaning the amount of gas may be even less. There is another deeper layer of gas beneath the Marcellus – but that is not technically extractible and would be expensive as well. We need to focus on regenerative systems – locally produced, locally supported and locally re-generative.	
Steve Kraffmiller, resident, Milford	12/14/2012	Increased NG Reliance	Opposes use of natural gas based on environmental concerns. Wants wind & solar energy used.	
Lynn LaFogg, resident, municipality unknown	12/13/2012	NG Infrastructure Expansion	Opposes expansion if it uses taxpayer or ratepayer money. Wants utility shareholders to fund expansion.	
BJ Lambert	12/13/2012	Increased NG Reliance	Some of the proposed natural gas expansions make economic and environmental sense, particularly converting homes that are already on main lines from oil to natural gas. More costly natural gas infrastructure expansions are not worth pursuing because of the economic and environmental risks.	
Dianne Lauricella	12/21/2012	Increased NG Reliance	CT should not rely so heavily on NG as its fuel choice. This is clearly "picking a winner."	

Natural Gas Sector Comments

Stakeholders	Date Filed	Main Topic	Specific Issue	Page Cite
Catherine Lino, Town of Killingworth	12/14/2012	NG Retail Choice	Supports the CES goal to enhance retail choice	
Fred Marra	12/18/2012	Increased NG Reliance	Likes NG but wants utility company to convert to NG at a reduced or subsidized cost	
Fred Marra	12/18/2012	Increased NG Reliance	want utility company to convert to NG at a reduced or subsidized cost	
Dennis Milanovich, Building Official, Stafford	5/27/2206	NG Infrastructure Expansion	encourage the use of duel fuel capable systems and municipal tax waivers	
Cindy Moeckel	12/14/2012	Increased NG Reliance	By relying on NG, CT is ignoring the externalities of NG exploitation. CT should take into account the long term environmental impacts of NG and focus instead on renewable development.	
James Newberry, New Haven	12/13/2012	NG Infrastructure Expansion	Opposes use of natural gas based on environmental concerns. Also opposes waste-to-energy and out-of-state hydro.	
Kris O'Brien	12/11/2012	Increased NG Reliance	One major problem with the current energy strategy is the assumption that natural gas prices will remain at current levels for an extended time frame. A second problem with the plan is the fact that natural gas is a dangerous product. If the gas companies want to expand, let them expand on their dime.	
Susan Olson, resident, Weatogue	12/14/2012	Increased NG Reliance	Opposes use of natural gas based on environmental concerns. Wants wind & solar energy used.	
Carole Osborn	12/12/2012	Increased NG Reliance	CES over-relies on NG rather than promoting the development of renewable energy	
Catherine Osten, Town of Sprague	12/10/2012	NG Retail Choice	Supports the CES goal to enhance retail choice	
Justin Paglino	12/12/2012	Increased NG Reliance	CT should remember that natural gas is still a fossil fuel that worsens global warming, and that fracking for natural gas releases extremely toxic chemicals into ground water. We can, and must, throw the full weight of our collective efforts towards a rapid-as-possible switch to 100% renewable energy sources.	
Frank Panzarella	12/19/2012	Increased NG Reliance	Renewables aren't closely addressed in the Draft and should be given the same level of "look" as gas; more affordable and practicable for urban areas	

Natural Gas Sector Comments

Stakeholders	Date Filed	Main Topic	Specific Issue	Page Cite
Lena Pavel	12/19/2012	Increased NG reliance	Totally against any form of fracking. It is quick way to make our environment uninhabitable, and put our health at stake. Hopes the State is not advocating this.	
Bonnie Reemsnyder, Town of Old Lyme	12/14/2012	NG Retail Choice	Supports CES plans that would give residents access to NG and help them reduce their energy costs	
Mary Rydingswald	12/17/2012	Increased NG Reliance	The Draft should provide real solutions rather than NG and incineration.	
Richard and Jennifer Salpeter	12/20/2012	Increased NG Reliance	Thinks CT's plan should include rebates for appliance upgrades and provide amortization rate of 20 to 30 years in order to finance upgrades.	
Anne Schick	12/13/2012	Increased NG Reliance	CES over-relies on NG rather than promoting the development of renewable energy	
Barbara Schlein - ratepayer	11/28/2012	Increased NG Reliance	Doesn't think it's appropriate for CT to be pushing for expansion of natural gas to the degree it is in the CES. This strategy is not in the interest of the environment and we shouldn't be subsidizing the gas industry.	
David Shenker	12/17/2012	Increased NG Reliance	Doesn't understand the states decision to switch from one fossil fuel to another. This is exactly the same as "switching seats on the Titanic."	
John Sievel, resident, Ashford	12/14/2012	NG Infrastructure Expansion	Opposes use of natural gas based on environmental concerns. Wants wind & solar energy used.	

Natural Gas Sector Comments

Stakeholders	Date Filed	Main Topic	Specific Issue	Page Cite
Anthony Sorge	12/17/2012	Increased NG Reliance	The Draft's emphasis on NG and incineration fail to address the realities of climate change and public health.	
Bruce and Bobbie Sullivan	12/21/2012	Increased NG Reliance	Wants DEEP to ban fracking in CT.	
Alan Walker, Jr., Town of Woodstock	12/12/2012	NG Retail Choice	Supports the CES goal to enhance retail choice	
Milton Wallack, resident, Branford	12/14/2012	Hurdle rate/CIAC policies	Wants hurdle rate & rates modified to support expansion	
Joseph Wasserman	12/12/2012	Increased NG Reliance	Funds for natural gas development should be diverted to energy efficiency, solar and wind. The issues involving contaminating ground water associated with natural gas development have not been resolved and the companies involved with natural gas development have not fully disclosed the chemicals they use. There is also the issue involving the release of methane release , which very much effects the climate of the planet. We should not become dependent on natural gas.	
Rev. Richard Watson	12/21/2012	Increased NG Reliance	NG expansion is NOT a progressive solution. We have now learned that over the expected lifetime of each of PA's fracking wells, companies may use as many as **9,000,000 gallons of water, and 100,000 gallons of chemicals and radioactive isotopes within a four-week period.** Fracking is also believed to have been the cause of hundreds of small earthquakes in Ohio and other states. If gas follows the trend of other non-renewables, it would be more difficult for consumers to make large-scale changes to truly clean energy in a lifetime.	
Len Yannielli, resident, Naugatuck	11/29/2012	Multiple CES topics: cross-file	Objects to natural gas expansion on environmental grounds. Objects to large in-state hydro. Wants a "Climate Change Jobs Fund" to support displaced workers. Wants solar on school buildings.	
Bob Yurch	12/12/2012	Increased NG Reliance	Believes that the free market is the fuel that drives the American economy. CT shouldn't pick winners and losers creating an unleveled playing field.	
Kurt Zilm, resident, Hamden	11/30/2012	NG Infrastructure Expansion	Supports expansion and objects to CIAC.	

Transportation Sector Comments

Stakeholders	Date Filed	Main Topic	Specific Issue	Page Cite
Clean Energy Finance And Investment Authority (CEFIA)	12/14/2012	Scope	State should push to develop sustainable funding sources. As a part of a pilot financing program that CEFIA is working on with local credit unions and the electric and gas utilities, financing is being made available to households for not only EE and RE improvements, but also for the deployment of EV recharging stations and natural gas refueling stations at their homes to support the use of alternative fuels. Through the use of ARRA State Energy Program funds, a loan loss reserve fund of $2.5 million is being made available to participating credit unions that will attract nearly $30 million of private capital investment. This program is expected to be launched in of the first quarter of 2013.	
Clean Energy Finance And Investment Authority (CEFIA)	12/14/2012	Scope	Requests to be included in the Interagency Working Group established in Recommendation 2	
CT DEEP Green Team	11/29/2012	Scope	Would like to see additional recommendations as well as a stronger means of implementing them, for example, proposed legislation and policies, pilot programs and state agencies leading by example.	
CT DEEP Green Team	11/29/2012	VMT Reduction	Suggests waiting to recommend the plans proposed to reduce VMT through an auto insurance structure that links premiums to the VMT until there is a better transportation system with abundant TODs.	
CT DEEP Green Team	11/29/2012	VMT Reduction	Should place more emphasis on telecommuting and commuting shorter distances.	
CT DEEP Green Team	11/29/2012	VMT Reduction	Should focus on eliminating VMT rather than just reducing them.	
CT DEEP Green Team	11/29/2012	VMT Reduction	State agencies can lead by example with telecommuting by setting a goal of number employees that telecommute and cars off the road, private industries can be offered some incentive. Existing infrastructure can be used for state satellite offices (example renovated thread mills in Willimantic that were intended for such. Employers could explore day offices/drop in offices and shared offices and have employees report there a day or two a week.	

Transportation Sector Comments				
Stakeholders	**Date Filed**	**Main Topic**	**Specific Issue**	**Page Cite**
CT DEEP Green Team	11/29/2012	Fleets, public rail transit, ground freight and outreach	Develop meaningful incentives for ridesharing, public transit and biking to work.	
CT DEEP Green Team	11/29/2012	Fleets, public rail transit, ground freight and outreach	Redesign and better advertise NuRide; lower fee for new riders in vanpools (may require a subsidy); promote part-time vanpool usage with appropriately adjusted rate structures; promote free trial rides for bus, train, and vanpooling; hold a ride free week a few times a year to encourage people to try these options.	
CT DEEP Green Team	11/29/2012	VMT Reduction	Pursue changes to Qualified Transportation accounts under IRS tax rules (would require action at the federal level) including: a) allowing biking commuters to set aside pre-tax income for biking expenses (currently not allowed, but is for parking, transit, and carpooling); b) make equal the amounts employees may set aside for car parking and public transit and carpooling expenses, currently parking is allowed more; c) car parking should be removed from this benefit allowance.	
CT DEEP Green Team	11/29/2012	VMT Reduction	Find out what the barriers are and what in/disincentives are needed for people to stop driving alone and fulfill the needs of non-drivers.	
CT DEEP Green Team	11/29/2012	VMT Reduction	Survey the public on these barriers, possibly as part of the DMV registration.	
CT DEEP Green Team	11/29/2012	VMT Reduction	CT's public transit system needs to be enhanced to meet the growing trend of the non-driver.	
Carley Johnson, DOE NREL (Fuels, Vehicles, and Transportation Group)	12/14/2012		"In addition, construction of parking spaces and electrification of truck stops has enabled some long-haul trucks to rest without keeping their engines running." I'd recommend changing to "In addition, construction of parking spaces and electrification of truck stops has enabled some long-haul trucks to power air conditioning, heaters, and keep their engines warm without running their engines".	153
Carley Johnson, DOE NREL (Fuels, Vehicles, and Transportation Group)	12/14/2012		To facilitate the use of these cleaner alternatives, this Draft Strategy proposes to increase the number of stations that can refuel these vehicles in strategic locations.	157

Transportation Sector Comments				
Stakeholders	**Date Filed**	**Main Topic**	**Specific Issue**	**Page Cite**
Carley Johnson, DOE NREL (Fuels, Vehicles, and Transportation Group)	12/14/2012		Emphasizes Regional Collaboration. Thinks CT's 4 Clean Cities coalitions are a very relevant chapter to add to this section	159
Carley Johnson, DOE NREL (Fuels, Vehicles, and Transportation Group)	12/14/2012	Infrastructure Investment	Energy use by vehicles is intimately linked with Connecticut's road infrastructure. Road capacity and condition affect energy consumption	160
Carley Johnson, DOE NREL (Fuels, Vehicles, and Transportation Group)	12/14/2012		Support from the National Highway Transportation Administration and revenues from the State gasoline tax, which has funded the construction and maintenance of roads, has declined sharply in recent years and is expected to continue to decrease as the fuel economy of the fleet increases as mandated by CAFÉ standards. The cumulative effect of the revenue shortfall amounting to $2 billion in 2011 is projected to grow more than $4.5 billion in 2017. Options for funding these necessary projects will need to be carefully considered.	160
Carley Johnson, DOE NREL (Fuels, Vehicles, and Transportation Group)	12/14/2012	VMT Reduction	THE COST OF CONGESTION. Need to mention the rebound effect whereby when you reduce congestion people will drive more miles because it's easier. So adding more lanes isn't an option.	161
Carley Johnson, DOE NREL (Fuels, Vehicles, and Transportation Group)	12/14/2012		TRANSPORTATION FUNDING GAP. Combine this with the similar section on page 160. The report currently brings it up twice.	165
Carley Johnson, DOE NREL (Fuels, Vehicles, and Transportation Group)	12/14/2012	Alternative Fuels	When you mention natural gases price, also mention that natural gas is less volatile and projected to stay cheap.	167
Carley Johnson, DOE NREL (Fuels, Vehicles, and Transportation Group)	12/14/2012		Convert BTUs into GGEs	167
Carley Johnson, DOE NREL (Fuels, Vehicles, and Transportation Group)	12/14/2012		A vehicle's payback period is largely determined by its fuel economy and the distance it travels per year.	171

Transportation Sector Comments				
Stakeholders	**Date Filed**	**Main Topic**	**Specific Issue**	**Page Cite**
Carley Johnson, DOE NREL (Fuels, Vehicles, and Transportation Group)	12/14/2012	Infrastructure Investment	It is an opportune time for the State and its municipalities to seek opportunities to engage smart growth principles to guide future development around the lines by consciously shaping the development that is expected to occur around State's current major transit projects	174
Carley Johnson, DOE NREL (Fuels, Vehicles, and Transportation Group)	12/14/2012	VMT Reduction	Encouraging employers to allow workers to telecommute, or to work the same number of hours in fewer days, would reduce the number of cars on the road and shift them to off-peak hours.	175
Department of Transportation, State of Connecticut	11/14/2012	Scope	Fully supportive of CES, committed to enhanced mobility and improving transportation effectiveness in their own core mission, will work with DEEP to achieve high efficiency vehicles and cleaner fuels and cleaner vehicles.	
Office of Consumer Counsel	11/14/2012	Alternative Fuel Vehicles	Overall pleased with chapter, would like to see a life cycle analysis of alternative fuel vehicles, specifically of the production and disposal phases of EV's. Consider its impact on the Emissions Reduction Chart.	176
Office of Consumer Counsel	11/14/2012	Scope	Would like to see included the basis of the firm rates used to price natural gas.	171
Office of Consumer Counsel	12/21/2012	Alternative Fuel Vehicles	While the OCC recognizes that there are ancillary environmental benefits in increasing the usage of alt. fuel vehicles in CT, the OCC finds that they do not warrant cross-subsidization from electric or natural gas ratepayers to fund alt. vehicle fueling infrastructure.	157
Office of Consumer Counsel	12/21/2012	Alternative Fuel Vehicles	When evaluating the emissions reduction benefits for AFV, OCC urges DEEP to consider a vehicle LCA that includes the production and disposal phases of alt. vehicles, including batteries. A LCA would allow DEEP to appreciate the different production concerns of AFVs, which tend to utilize more advanced material. A cost-benefit analysis incorporating the LC of AFVs will help DEEP and DOT deploy a measured approach to building out CT's AFV infrastructure.	
Office of Consumer Counsel	12/21/2012	Infrastructure Investment	OCC does not support using ratepayer funding for AFV station infrastructure. OCC encourages DEEP to outline the full range of the available funding options for AFV station infrastructure as well as a cost analysis for each type of proposed fueling station in the final CES.	

Transportation Sector Comments

Stakeholders	Date Filed	Main Topic	Specific Issue	Page Cite
Office of Consumer Counsel	12/21/2012	Alternative Fuel Vehicles	Encouraged that CES's approach is to provide, "an open platform that enables new and varied technologies…a chance to prove themselves." OCC values alt. fuel diversity, and finds it important that a heavy reliance on any particular fuel be avoided. For instance, an increase in the use of NGVs in CT could be a potential stressor on an already strained NG system. TOU rates for electric vehicle charging must also be considered in light of the potential effect on peak load.	168
Air and Gas Technologies	11/14/2012	Alternative Fuel Vehicles	Supports alt. fuels in CES, however CES is skewed because nat. gas in vehicles is primarily used in medium- to heavy-duty vehicles while the CES compares most to light-duty making NG seem less attractive an option.	
Air and Gas Technologies	11/14/2012	Alternative Fuel Vehicles	Would like to see CT regulation for shale gas mirror that of PA.	
Air and Gas Technologies	11/14/2012	Infrastructure Investment	Recommends a holistic approach to natural gas expansion to service both buildings and vehicles.	
Air and Gas Technologies	12/6/2012	Scope	After review of Transportation and Natural Gas chapter, they believe that these two should be treated as 'homogenous' with respect to expanding the use of NGV.	
Air and Gas Technologies	12/6/2012	Alternative Fuel Vehicles	Encouraging to see natural gas vehicles in the chapter, however, the information appears to be flawed or skewed, as it is being compared primarily to private light duty vehicles at 12,000 miles per year.	
Air and Gas Technologies	12/6/2012	Alternative Fuel Vehicles	They had difficulty making the numbers in table 1 on page 169 match the results. 12,000 miles @ 23 MPG = 521 gal/year. Based upon the given fuel costs - $4.47 for gasoline and $2.04 for CNG there is a saving of $2.43/gal x 521 gal = 1,266/yr. or $15,192 over vehicle life. This results in a payback of less than the stated 8 years, but it is still not particularly attractive.	169

Transportation Sector Comments				
Stakeholders	**Date Filed**	**Main Topic**	**Specific Issue**	**Page Cite**
Air and Gas Technologies	12/6/2012	Alternative Fuel Vehicles	NGV America has the following information taken from actual fleets: 1)Passenger Van @ 75-90K miles/yr. @ 13/15 MPG (4700-5800 GGE/yr.) with a $15K incremental cost and $1.50 savings per GGE is 1.7 – 2.1 year payback; 2)Sedan @ 30K miles/yr. @ 19/30 MPG (1000-1575 GGE/yr.) with a $6.5K incremental cost and $1.50 savings per GGE is 2.75 – 4.3 year payback; 3)Step Van @ 26-28K miles/yr. @ 5/6.5 MPG (4200-5000 GGE/yr.) with a $25K incremental cost and $1.70 savings per DGE is 2.9 – 3.5 year payback; 4)Grocery Truck @ 68K miles/yr. @ 5.6 MPG (12,150 DGE/yr.) with a $60K incremental cost and $1.70 savings per DGE is 2.9 year payback; 5)Refuse Truck @ 68K miles/yr. @ 2.5/3 MPG (8500/10,000 DGE/yr.) with a $32K incremental cost and $1.70 savings per DGE is 1.8 - 2.2 year payback.	
Air and Gas Technologies	12/6/2012	Alternative Fuel Vehicles	As can be seen from the above information, payback term is attractive, and the higher mileage displaces far more fuel with associated emission reduction. Additionally, the differential cost between natural gas and gasoline/diesel engines is lessening based upon increased volume and the increased cost and complexity of diesel engines to meet current emission standards.	
Air and Gas Technologies	12/6/2012	Alternative Fuel Vehicles	There are questions and concerns in the document about how to pay for natural gas fueling stations. Typically, these are built on the same principle as a shopping mall with a large anchor tenant and several smaller ones. One of the above fleets would be considered the anchor tenant, and the fuel usage from this fleet used as the main revenue stream to develop a business model to attract investors and developers. The station can then marketed to attract additional vehicles to accelerate ROI. As you can see, this again emphasizes the importance of fleet vehicles in the development of alternate fuels in CT.	
Air and Gas Technologies	12/6/2012	Alternative Fuel Vehicles	Connecticut should embrace use of EPA-approved aftermarket natural gas vehicle conversion systems.	
Air and Gas Technologies	12/6/2012	Alternative Fuel Vehicles	The State should invest in clean fuels/vehicles to show the interest is real and not just a political ploy.	

Transportation Sector Comments				
Stakeholders	**Date Filed**	**Main Topic**	**Specific Issue**	**Page Cite**
	12/6/2012	Alternative Fuel Vehicles	Expansion of the natural gas distribution is much needed, but most of the document is focused on switching private homes and power stations from oil; and it does not include the significant load natural gas vehicles can add. The use of shale gas is mentioned for power generation for EVs but nothing for CNG.	
Air and Gas Technologies	12/6/2012	Alternative Fuel Vehicles	Connecticut should also equalize its motor fuel tax rates for CNG and LNG based on amount of energy in a gasoline gallon and diesel gallon; current CT rates result in much higher effective tax rate for CNG and LNG because the tax is not based on energy content but rather on volume.	
Air and Gas Technologies	12/6/2012	Alternative Fuel Vehicles	Natural Gas usage in homes is primarily only during the winter months, and transportation use is year round. Based upon information from CT gas utilities, the annual home usage is around 90,000 SCF/yr., which equates to around 720 GGE/yr. or 665 DGE/yr. As can be seen above, the majority of NGVs use between 5 - 17 times this amount, so natural gas vehicles must factor into the gas infrastructure expansion plans.	
Air and Gas Technologies	12/6/2012	Alternative Fuel Vehicles	They offer their assistance to DEEP to flesh out the NGV and infrastructure content.	
All-Waste, USA Hauling and Recycling and Kleen Energy	11/14/2012	Infrastructure Investment	His company is building a large CNG fueling station for medium- and light-duty trucks in Hartford. Anticipates it opening for the public as soon as 2013.	
Bike/Walk Connecticut	11/14/2012	Scope	Generally supportive of CES recommendations.	

Transportation Sector Comments				
Stakeholders	**Date Filed**	**Main Topic**	**Specific Issue**	**Page Cite**
Bike/Walk Connecticut	11/14/2012	VMT Reduction	Supports Rec. 3 to facilitate TOD, urges DEEP to incorporate: 1) Robust implementation of CT's Complete Streets statutes (Conn. Pub. Acts 09-154 and Conn. Gen. Stat. Secs. 13a-153f and 13b-13a); the Share the Road campaign (Conn. Gen. Stat. Sec. CGS 14-232(13)(a)); and the recommendations of the Bicycle & Pedestrian Advisory Board, which will make 'active transportation' options safer and more feasible, thereby making it easier for people to reduce their VMTs; 2) Strong coordination with other state agencies where their work overlaps and supports the goals of the CES, such as with DOT, OPM, DECD, and Public Health; 3) Employer incentives for bike to work programs; and 4) "Lead by Example" approach throughout the state government, wherein offices in the executive, legislative and judicial branches promote and facilitate a bike to work program and work toward Bicycle Friendly Business accreditation, which to its great credit, DEEP has attained.	177
Bike/Walk Connecticut	11/14/2012	VMT Reduction	Supports bikeable/walkable communities as a way to support vehicle miles driven (VMT) reductions.	
Bike/Walk Connecticut (Form Letter, 41 individual signees)	11/14/2012	Scope	Set specific reductions in GHGs and other pollutants that will help CT meet the requirements of PA 08-98.	
Bike/Walk Connecticut (Form Letter, 41 individual signees)	11/14/2012	Infrastructure Investment	Increase investment in transportation infrastructure that promotes biking and walking that reduces GHG but also creates healthier communities and reduces health care costs.	
Bike/Walk Connecticut (Form Letter, 41 individual signees)	11/14/2012	Fleets, public rail transit, ground freight and outreach	Support regional planning for sustainable transportation options in CT.	
Bike/Walk Connecticut (Form Letter, 40 individual signees)	12/18/2012	Fleets, public rail transit, ground freight and outreach	Increase investment in transportation infrastructure that promotes biking and walking that reduces GHG but also creates healthier communities and reduces health care costs.	
Bike/Walk Connecticut (Form Letter, 40 individual signees)	12/18/2012	Fleets, public rail transit, ground freight and outreach	Support regional planning for sustainable transportation options in CT.	

Transportation Sector Comments				
Stakeholders	**Date Filed**	**Main Topic**	**Specific Issue**	**Page Cite**
Clean Energy Fuels (CA-based company)	12/20/2012	Alternative Fuel Vehicles	Supports deployment of natural gas vehicles, but they have an upfront incremental cost. While this cost is eliminated over time by fuel savings, it still serves as a barrier to many potential adopters. Assistance by the state should be temporary. A five year vehicle sales tax moratorium would provide the necessary cost mitigation to open up the light and medium-duty market.	
Clean Energy Fuels (CA-based company)	12/20/2012	Alternative Fuel Vehicles	CT can have a fully operational and well-developed CNG and LNG refueling network within three years. 1500 heavy-duty NGVs would provide the necessary support for the infrastructure. A rebate of $15000 per heavy/duty vehicle, provided by the state and facilitated by the dealerships, would ensure that the critical mass of NGVs is reached within 3 years.	
Clean Energy Fuels (CA-based company)	12/20/2012	Alternative Fuel Vehicles	The state can take advantage of public-private partnerships to transition its fleet vehicles and mass transit buses to natural gas	
Clean Energy Fuels (CA-based company)	12/20/2012	Alternative Fuel Vehicles	CT taxes LNG by the gallon rather than on a diesel gallon energy equivalency (DGE). CT should continue to tax LNG at the diesel fuel tax rate, but must change the law to apply the rate to a DGE of LNG rather than a gallon.	
Clean Energy Fuels (CA-based company)	12/20/2012	Alternative Fuel Vehicles	CNG is traditionally sold in GGE. The National Institute of Standards and Technology defines GGE as 5.660 lbs. of NG. The current CT definition of a CNG gallon is 82.62 cubic feet. This definition should be updated to the NIST definition which more accurately reflects a GGE and creates consistency with other states.	
Connecticut Fund for the Environment	11/14/2012	VMT Reduction	Strongly supports funding and Compete Street issues. Supports DEEP's emphasis on reducing VMT.	
Connecticut Fund for the Environment	11/14/2012	Scope	Would like to see concrete action steps to implement recommendations and fill them out to make a complete strategy.	

Transportation Sector Comments				
Stakeholders	**Date Filed**	**Main Topic**	**Specific Issue**	**Page Cite**
Connecticut Fund for the Environment	11/14/2012	Fleets, public rail transit, ground freight and outreach	Recommendations of a stakeholder group they convened: a) Create a specific policy and position that would be in charge of prioritizing and promoting TOD in the state around new and existing transit projects. Should start coordinating state resources to best achieve the highest priorities and most appropriately support all of the priorities; b) Should be a unified application for towns, so they do not have to become expert in four or more different agencies with different funding opportunities. They should be able to submit one application. Should be some structure within the agencies to get towns appropriate resources within the priorities; c) Would like to see the pilot developing in Meriden to be extended; d) Would like to see some provision for some ability to lend bank and finance for projects that are ready to go and move forward. That can be a new authority. It could also be an existing authority; e) There needs to be clarity to the towns in terms of what the state considers to be TOD; f) There need to be additional resources.	
Connecticut Fund for the Environment	12/20/2012	Scope	Hopes that DEEP will assemble a group of policies to achieve the state's GHG emission goal for 2030.	
Connecticut Fund for the Environment	12/20/2012	Scope	Final CES should contain a more robust set of recommendations. Specifically, there should be policies to: 1) fully fund and expand transit routes and service frequency; 2) promote TOD and smart growth; and 3) reduce congestion and raise transportation funds through strategies like congestion pricing.	
Connecticut Fund for the Environment	12/20/2012	Scope	In accordance with GWSA, believe that the final CES should contain an examination of how the major proposals would affect CT's gag emissions in 2020, 2030, 2040, and 2050 and compare the results to the appropriate goal for each year	

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Connecticut Fund for the Environment	12/20/2012	Alternative Fuel Vehicles	CFE supports many of the proposed measures in the draft CES relating to clean fuels/vehicles, particularly the promotion of high fuel economy vehicles and the targeted build-out of EV charging stations. These policies can provide serious economic and environmental benefits in the short and medium term. But achieving meaningful long-term gag reductions will require reductions in VMT. The fact that there seems to be little will at the federal or state level to raise gas taxes in a meaningful way makes it even more unlikely that alternative fuels will be able to compete significantly with oil.	
Connecticut Fund for the Environment	12/20/2012	Scope	Conflicts and analysis with Figure 17. They provide some sense of the scale of possible emissions reductions for transportation.	176
Connecticut Fund for the Environment	12/20/2012	Fleets, public rail transit, ground freight and outreach	Transit for CT, a program of CFE, performed a bus needs analysis in 2007 which was updated in 2012. They include a list of what unmet needs are. Transit for CT has proposed a 5-year funding plan with the potential to increase bus ridership by 64%. Also provided is Transit for CT's Missing Links report that outlines 13 expansions to the bus system that could best reduce CT's dependence on motor vehicles, expand access to employment and job growth while working toward state goals to reduce transportation-related carbon emissions.	
Connecticut Fund for the Environment	12/20/2012	Fleets, public rail transit, ground freight and outreach	With CTfastrak and the New-Have-Springfield rail, CT has an unparalleled one-time opportunity to reshape the way we connect to each other and to the region, create jobs, support transit, and wisely develop. The more than $1.5 billion in federal and state investments in intercity rail and bus rapid transit can be leveraged to support meaningful TOD that will reduce car dependence and increase rail ridership.	
Connecticut Fund for the Environment	12/20/2012	Fleets, public rail transit, ground freight and outreach	There is a need for the state to help communities overcome the complexities of infill development, brownfield remediation, mixed-use, and mixed-income communities (in support of TOD).	

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Connecticut Fund for the Environment	12/20/2012	Fleets, public rail transit, ground freight and outreach	For TOD they recommend: 1) a system to prioritize and promote TOD with an official specifically charged with the authority and responsibility for its creation and implementation; 2) completion of an inventory of existing state programs and funding sources, which can be aligned, directed and applied to TOD projects; 3) incentives for proactive station planning and zoning including a system to direct state resources and bonding toward TOD priorities that constitute mixed-use, mixed-income walkable, bikeable, and environmentally-friendly communities; 4) a unified application that municipalities can fill out to seek assistance from multiple state agencies; 5) robust technical and other support for basic visioning, planning and zoning; 6) development of a mechanism or process to assist with land banking and property acquisition.	
Connecticut Fund for the Environment	12/20/2012	Continued from 162	7) prioritization of the placement of state-funded buildings in transit communities; 8) creation of a package of revenue enhancement options and incentive strategies that can be implemented administratively or through legislative action; 9) public-private partnerships to leverage the various capacities of local and state government and the private sector; 10) use of value capture strategies such as tax increment financing, business improvement districts, assessment districts, and developer agreements to generate funds that can benefit the greater community; 11) promoting shared parking; 12) promoting sustainable development meeting LEED-ND standards.	
Connecticut Fund for the Environment	12/20/2012	VMT Reduction	In the long run, congestion pricing will be central to the state's ability to manage congestion and raise revenues to support the transit that will be necessary to support the economy and reduce emissions. CT DOT is currently conducting a major study of congestion pricing in the perennially overcrowded I-95 corridor and should provide a guide for a successful state-of-the-art tolling system.	

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ConnPIRG, Clean Water Action, CT Citizens Action Group, Environment CT, Sierra Club CT Chapter, National Sierra Club, RENEW, Working Families Organization, Conservation Law Foundation, Inter-Religious Eco-Justice Network, 350 CT	12/21/2012	Scope	The Draft CES often refers to gags but fails to evaluate how each policy will contribute to achieving the legislatively mandated targets for 2020 and 2050. Taking leadership on reducing gag emissions is an essential step in CT setting a national precedent.	
ConnPIRG, Clean Water Action, CT Citizens Action Group, Environment CT, Sierra Club CT Chapter, National Sierra Club, RENEW, Working Families Organization, Conservation Law Foundation, Inter-Religious Eco-Justice Network, 350 CT	12/21/2012	Alternative Fuel Vehicles	It is essential that CT continue its leadership (shown through adoption of California low emissions and zero emissions vehicle standards) by updating its vehicle emissions standards and zero emissions vehicle program, promoting Transit Oriented Development and moving forward with the next generation of vehicle emissions control through adoption of the market-based Clean Fuels Standard.	
Conservation Law Foundation	12/21/2012	Alternative Fuel Vehicles	Supports DEEPs acknowledgement to pursue electric vehicles, and for spearheading the creation of the Electric Vehicle Infrastructure Council (EVIC) in 2009. Given that the EVIC is no longer operative, CLF is pleased to see that CT is picking back up with inter-agency coordination that will advance EV deployment. Though it is not mentioned in the Draft CES, CLF urges DEEP to include issues related to PURA in the agenda for this group, particularly strategies to make time-of-use rates and vehicle-to-grid charging possible.	
Conservation Law Foundation	12/21/2012	Alternative Fuel Vehicles	Lack of tangible recommendations for electric vehicle purchase incentives is notably lacking	

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Conservation Law Foundation	12/21/2012	Alternative Fuel Vehicles	While adopting the Advanced Clean Cars Program is a critical step, it should not be done in isolation. CLF encourages the administration to take additional steps to affirmatively pursue the development of a robust infrastructure for low and zero emissions vehicles to the state.	
Conservation Law Foundation	12/21/2012	Other	CLF strongly urges DEEP to honor the 2009 NE/MA CFS MOU commitment and the continuing efforts to reduce pollution, boost the local economy, and move off imported oil by acknowledging the New England/Mid-Atlantic Clean Fuel Standard as a CT priority.	
Conservation Law Foundation	12/21/2012	Fleets, public rail transit, ground freight and outreach	CLF notes the absence of a real commitment to expanding transit systems in CT.	
Conservation Law Foundation	12/21/2012	Fleets, public rail transit, ground freight and outreach	Investments in energy improvements should benefit all communities in CT. The state should prioritize transit services that will benefit lower income residents and communities of color, whose transportation needs are currently underserved, and who are likely to experience disproportionately less direct or immediate benefits of advanced technology vehicle deployment.	
Environment CT	12/19/2012	Scope	Recommends that DEEP and the CES take a holistic approach to the CES, that all programs proposed be evaluated based on how they contribute both to meeting our RPS goals as well as our GWSA mandates. At best the CES can and should be a roadmap for CT to achieve these goals, with concrete strategies and interim benchmarks clearly detailed. Such a comprehensive plan will elevate CT's status as a leader in protecting the region's environment and securing our clean energy future.	
Environment CT	12/19/2012	Scope	Commend DEEP for taking a holistic approach to transportation and energy, as well as showing leadership.	
Environment CT	12/19/2012	Alternative Fuels/Vehicles/VMT Reduction	Agree to expand transportation choices and reduce dependence on oil; endorse a feebate program; support pay-as-you-drive insurance programs; and support TOD.	

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Environment CT	12/19/2012	Alternative Fuel Vehicles	Surprised by the lack of a LCFS in the text, given that CT is part of the regional effort to create the CFS. Recommend that this is adopted in the final CES.	
Environment CT	12/19/2012	Alternative Fuel Vehicles	Would like to see implementation of the ZEV program that has recently been adopted as part of the California Clean Cars program, in which CT participates, and which must (and should) be passed through legislative committee to become law in CT.	
Environment CT	12/19/2012	Alternative Fuel Vehicles	Oppose any measures that would promote CNG as transportation fuel given that the National Academy of Science has found that using natural gas in transportation causes a net increase in global warming. Rather they would like to see a greater focus on performance goals for transportation funding.	
Environment CT	12/19/2012	Fleets, public rail transit, ground freight and outreach	Recommend placing higher emphasis on prioritizing public transit, and to address the funding shortfall outlined in the document, a consideration of solutions such as congestion pricing.	
Environment CT	12/19/2012	Fleets, public rail transit, ground freight and outreach	Recommend removing regulatory barriers to high density alternative housing in addition to providing funding for TOD, as an alternative means of reducing emissions associated with transportation.	
Environment Northeast	12/21/2012	Other	ENE believes the CES can be an invaluable energy policy and planning tool for numerous reasons. It can have an economy-wide scope that can capture the full complexity of the state's energy policy issues. The long-range planning horizon – out to 2050 – encourages strategic, high-level thinking. The use of economic analysis (essentially required by the governing statute) can clarify options and strengthen its policy recommendations. It offers Connecticut's energy stakeholders a comprehensive planning process for addressing their interests and concerns. And, finally, the requirement to revise the CES every three years affords policymakers the opportunity to constantly evaluate progress and reassess strategic choices, as well as refine and expand methodologies.	
Environment Northeast	12/21/2012	Other	Perform Cost-Benefit Analysis for All Fuel and Non-Fuel Options.	

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Environment Northeast	12/21/2012	Other	Identify Long-Range Planning Risks.	
Environment Northeast	12/21/2012	Other	Synchronize transportation planning with GHG Emissions Targets.	
Environment Northeast	12/21/2012	Other	Clearly Identify Formal Recommendations.	
Environment Northeast	12/21/2012	Alternative Fuel Vehicles	Promote the use of highly efficient vehicles for passengers and freight.	
Environment Northeast	12/21/2012	Alternative Fuel Vehicles	Much more education and outreach for plug-in electric vehicles than is defined in the Draft CES is needed.	
Environment Northeast	12/21/2012	Alternative Fuel Vehicles	There are a number of ways in which DEEP, working in concert with other stakeholders, can engage and educate members of the public about PEV options. ENE believes that DEEP should explore the these mechanisms.	
Environment Northeast	12/21/2012	Alternative Fuel Vehicles	Believes that Connecticut should offer a financial incentive to reduce the up-front costs of a PEV.	
Environment Northeast	12/21/2012	Alternative Fuel Vehicles	A strong, consistent, and engaged stakeholder presence is a core element in areas of the country that have higher rates of PEV adoption and better-developed PEV policies. Working in coordination with state agencies, a strong stakeholder community can be invaluable in identifying and working to reduce barriers, seeking and securing federal and other grant opportunities, and in other ways helping to speed the adoption of these cleaner vehicles into the area fleet. The EV Infrastructure Council can be a powerful tool in achieving DEEP's transportation goals and it should be deployed.	
Environment Northeast	12/21/2012	Alternative Fuel Vehicles	Promote Home and Workplace Charging.	
Environment Northeast	12/21/2012	Alternative Fuel Vehicles	Believes the CES should aggressively tackle utility-related barriers to increased PEV adoption.	

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Environment Northeast	12/21/2012	Alternative Fuel Vehicles	This proceeding should focus on the following goals: 1) Establish a set of guiding principles to inform PURA's decision-making; 2) Engage in system planning, specifically forecasts of load and peak demand, and implications for infrastructure and energy needs and costs; 3) Establish of reporting and analysis requirements for utilities over time; 4) Define provisions that allow for the buying of stored energy back from electric vehicle owners (vehicle-to-grid) and changes to rates and standards to facilitate this (similar to net metering); 5) Develop procedures for accelerated utility review and service upgrades; 6) Define regulatory treatment for non-utility, third-party transportation electricity providers; 7) Establish requirements for consumer education about rates structures and the impact of electric vehicle charging on rates, estimating charging costs, and residential charging installation; 8) Allow utilities to provide service for demonstration purposes, for internal use, through unregulated affiliates, or for areas that the private market would not accommodate otherwise; and 9) Establish rules to permit the re-sale of electricity by non-utilities for delivery of EV charging.	
Environment Northeast	12/21/2012	Alternative Fuel Vehicles	Explore PEV data collection and report on options through pilot programs or other initiatives.	
Environment Northeast	12/21/2012	Alternative Fuel Vehicles	Advance a Regional Clean Fuels Standard.	
EVSE LLC subsidiary of Control Module Inc.	12/18/2012	Infrastructure Investment	Requests that CT DEEP uses CT companies for installation of EVSE charges as recommended in the plan.	
EVSE LLC subsidiary of Control Module Inc.	12/18/2012	Infrastructure Investment	Recommend that DEEP take a leadership position and require EV chargers with cable management that keeps the cable off the ground while charging and when not in use.	
EVSE LLC subsidiary of Control Module Inc.	12/18/2012	Infrastructure Investment	They have provided a list of videos that they urge DEEP to review regarding EV charging and persons with disabilities.	

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EVSE LLC subsidiary of Control Module Inc.	12/18/2012	Infrastructure Investment	Westport, CT has installed solar panels on the roof of a remodeled station, these panels charge 4 Level 1 chargers. They believe that the Westport project can be duplicated at DOT owned train parking lots and wherever long term parking occurs.	
EVSE LLC subsidiary of Control Module Inc.	12/18/2012	Infrastructure Investment	Before assuming Fast Chargers with their exceptionally heavy, large, and hard to manage cords are fine for consumers, DEEP needs to evaluate Fast Charging solutions that ensure ease of use and safety for its patrons along major travel lanes.	
EVSE LLC subsidiary of Control Module Inc.	12/18/2012	Infrastructure Investment	Suggests that DEEP consider that the charging time gap between Level 2 and Fast Charging is rapidly diminishing; and to consider Level 2 as a viable alternative, especially given that more Level 2s could be installed to serve more EV customers, while reducing the high cost of Fast Charging Infrastructure.	
EVSE LLC subsidiary of Control Module Inc.	12/18/2012	Infrastructure Investment	As DEEP prepares the final CES, it would help to imagine a corridor of EV charger cables on the ground, exposing persons with disabilities and all the general public to tripping injuries, and having to find J1772 connectors buried in snow, or submerged in water.	
EVSE LLC subsidiary of Control Module Inc.	12/18/2012	Infrastructure Investment	Paying for EV parking spaces should be as easy as paying for any parking space.	
Hocon Gas Inc.	11/27/2012	Alternative Fuel Vehicles	Supports inclusion of propane auto gas.	
Hocon Gas Inc.	11/27/2012	Alternative Fuel Vehicles	The propane industry seeks parity with the natural gas industry when it comes to auto gas and tax credits.	
Hocon Gas Inc.	11/27/2012	Alternative Fuel Vehicles	Suggests (given Clean Cities comments) that the state explore what has been done on the NGL filling stations and why. Propane vehicle fueling stations can be added at a fraction of the cost of NGL stations. The existing network of gasoline fueling stations can be utilized.	
Hocon Gas Inc.	11/27/2012	Alternative Fuel Vehicles	DEEP should look at the cost of propane as an auto gas, rather than as a heating fuel.	
Institute for Sustainable Energy at ECSU	11/14/2012	Alternative Fuel Vehicles	Should consider and include "Initial Findings and Recommendations of the Fuel Diversification Task Force" (2007, January 16) and the "Final Report" (2010, September 1) issued by the CT Electric Vehicle Infrastructure Council.	

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Institute for Sustainable Energy at ECSU	11/14/2012	Alternative Fuel Vehicles	Biodiesel is a very productive industry in the State (with 6 production facilities).	
Institute for Sustainable Energy at ECSU	11/14/2012	Infrastructure Investment	State should have Time-of-Use rates to encourage off-peak charging.	
Institute for Sustainable Energy at ECSU	11/14/2012	Infrastructure Investment	DEEP should consider including the 11-80 section on incentives available to developers to build high-performance buildings to LEED Gold or Platinum Levels, may encourage Transit Oriented Development (TOD). DEEP should included information on the Clean Cities program effectiveness with assisting communities to get Federal dollars for TOD.	
Institute for Sustainable Energy at ECSU	12/19/2012	Alternative Fuel Vehicles	Encourage the Use of Electric Vehicles (EVs) and Dynamic Pricing for EV Charging.	
Institute for Sustainable Energy at ECSU	12/19/2012	Alternative Fuel Vehicles	Time-of-Use rates for encouraging Electric Vehicle owners to charge their vehicles in the off-peak period should be enacted.	
Institute for Sustainable Energy at ECSU	12/19/2012	Scope	Utilize Department of Energy (DOE) Clean Cities Program. An effort should be made to get more cities and towns in Connecticut aware of and involved with the program.	
Institute for Sustainable Energy at ECSU	12/19/2012	VMT Reduction	Support Sustainable, Transportation-Friendly Neighborhood Development and Transportation & Climate Initiative (TCI) Strategy.	
Institute for Sustainable Energy at ECSU	12/19/2012	Alternative Fuel Vehicles	Advantages of hydrogen-powered vehicles should be considered in the long range plan as that technology advance.	
Institute for Sustainable Energy at ECSU	12/19/2012	Fleets, public rail transit, ground freight and outreach	Introduce Light Rail: The state should consider light rail to help alleviate congestion in our busiest areas and during peak travel times, especially in our capital.	
National Propane Gas Association	11/14/2012	Alternative Fuel Vehicles	CES must include propane as an alternative fuel.	
New England Electric Auto Association, Dave Oliveria	12/14/2012	Alternative Fuel Vehicles	1) Public education is fine, believes seeing Electric Vehicle Supply Equipment and Electric Vehicle's in action makes a bigger statement; 2) set up a 'rideshare' program with an Electric Vehicle, with Electric Vehicle Supply Equipment installed at both ends of the commute, decal the car with Electric Vehicle and Rideshare info.	176

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New England Electric Auto Association, Dave Oliveria	12/14/2012	Alternative Fuel Vehicles	1) Create incentives / benefits to employers who install EVSEs at their facilities; 2) Create incentives / benefits for condominiums / apartment complexes who install EVSEs where personal EVSEs are impractical; 3) Level 3 chargers are nice but they may be a bit over played? If he's not mistaken, the cost of one Level 3 EVSE could pay for 25 Level 2 chargers.	177
New England Electric Auto Association, Dave Oliveria	12/14/2012	Alternative Fuel Vehicles	CT needs to get up to speed on different form of Electric Vehicle charging rates.	
Northeast Utilities Association (CL&P and Yankee Gas)	12/21/2012	Other	p. 155 – "Of these 31 billion miles, nearly all are from people traveling in passenger cars and light trucks."	155
Northeast Utilities Association (CL&P and Yankee Gas)	12/21/2012	Other	p. 158, Figure 5 - New EV charging stations are missing from map. See http://www.afdc.energy.gov/locator/stations/ for updated list.	158
Northeast Utilities Association (CL&P and Yankee Gas)	12/21/2012	Alternative Fuel Vehicles	p. 170 – Add "...According to McKinsey* the price of a complete automotive lithium-ion battery pack could fall from $500 to $600 per kilowatt hour (kWh) today to about $200 per kWh by 2020 and to about $160 per kWh by 2025. Such reductions could create conditions for the widespread adoption of electric vehicles in some markets." * See http://www.mckinseyquarterly.com/Battery_technology_charges_ahead_2997.	170
Northeast Utilities Association (CL&P and Yankee Gas)	12/21/2012	Alternative Fuel Vehicles	p. 171 – Add: "The alternative vehicle technologies presented in Table 1 all result in a lifetime reduction in fuel costs. State polices have the potential to impact the Lifetime Fuel Savings. Preservation of this fuel cost advantage is of critical importance to consumer and fleet adoption of alternative fueled vehicles..."	171
Northeast Utilities Association (CL&P and Yankee Gas)	12/21/2012	Alternative Fuel Vehicles	p. 176 – Add "...By 2020, 10% of the state vehicle fleet should be powered by alternative fuels or ZEV vehicles."	176

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Northeast Utilities Association (CL&P and Yankee Gas)	12/21/2012	Alternative Fuel Vehicles	Add: In an effort to foster CT's cv/cf platform, DEEP will advance the following: 1) A targeted build-out of an additional 50 publicly available Level 2 electric vehicle charging stations at shopping malls, parking lots, and other sites across the state – sufficient to eliminate range anxiety. In addition DEEP and ConnDOT will work to establish a network of 8 Level 3 electric vehicle charging stations by 2014, located primarily at highway service plazas on the interstate highways. Partial funding for the targeted build out should come from a contribution established in Article 2 of the NU and NSTAR merger settlement agreement, where NU shall provide a one-time, nonrecurring and non-recoverable payment for the implementation of a targeted plan to advance CT's energy goals; 2) Dev. of a pilot program to support the conversion of fleet vehicles to NGVs and the build-out of a network of publicly available LNG and CNG filling stations. Partial funding for the targeted build out should come from a contribution established in Article 2 of the NU and NSTAR merger settlement agreement, where NU shall provide a one-time, nonrecurring and non-recoverable payment for the implementation of a targeted plan to advance CT's energy goals; 3) Continued pursuit of fed. funding opportunities to advance research and development of hydrogen fuel cell technology and other alternative fuel technologies in the transport sector; 4) Creation of an ~~interagency working group~~ ad hoc Transportation Energy Comm. comprised of ConnDOT, DEEP, the DMV, and the Depts. of Consumer Protection, Administrative Services, Revenue Services, clean cities coordinators, utilities and automakers to identify and implement changes needed to support AFVs including, but not limited to DMV inspection processes, consumer protection issues for alternative fuels, and building code components related to alternative fuel charging and refilling. The commission should be led by DEEP. The commission will also provide oversight for the outreach campaign identified in Transportation Rec 1, identify future research needs, identify policy needs and coordinate grant activities	177
Northeast Utilities Association (CL&P and Yankee Gas)	12/21/2012	Alternative Fuel Vehicles	Add: To preserve the fuel cost advantage of alternative fuels this Draft Strategy also recommends that PURA adopt the use of firm rates rather than non-firm rates to base the price of natural gas vehicle fuel rather than linking it to the price of gasoline thereby providing a clearer price signal that will incent greater utilization of natural gas vehicles.	
Northeast Utilities Association (CL&P and Yankee Gas)	12/21/2012	Alternative Fuel Vehicles	PURA should have regulatory oversight responsibilities for natural gas and electricity in the transportation section.	

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Northeast Utilities Association (CL&P and Yankee Gas)	12/21/2012	Alternative Fuel Vehicles	Add: DEEP's policy in this area should be based on the belief that market forces will ensure supply meets demand, and in the need for intelligent regulation to set the rules of competition, ensure safety, provide transparency to market participants, support the most cost-effective infrastructure, and strive to maintain the cost advantage of natural gas and electricity in transportation.	
Northeast Utilities Association (CL&P and Yankee Gas)	12/21/2012	Alternative Fuel Vehicles	Add: DEEP shall require utilities to bring forward pilot proposals to PURA with associated cost recovery that provide mechanisms or incentives to customers that encourage off-peak vehicle recharging and minimize the impacts of electric vehicle charging on the grid.	
Northeast Utilities Association (CL&P and Yankee Gas)	12/21/2012	Infrastructure Investment	p. 178 – Add to Recommendation 5: "The options outlined by the Transportation Strategy Board, included in Appendix D, need to be evaluated on the basis of their ability to provide funding sufficient to sustain current transportation sector needs as well as those that will be needed to enhance mobility options and reduce the negative economic and environmental impacts of transportation. Such mechanisms shall be administered in a uniform manner and not directed solely at alternative fuels or alternative fueled vehicles."	178
Regional Plan Association, CT	11/14/2012	Fleets, public rail transit, ground freight and outreach	Stresses the need to support transit and to implement the Complete Streets Laws.	
Regional Plan Association, CT	11/14/2012	VMT Reduction	Implementation strategies in the chapter are a little light, but probably because DOT is the real implementer. When DOT (or whoever) has specifics on how to implement VMT reduction strategies would like to see them in next round of CES.	
Regional Plan Association, CT	11/14/2012	Scope	DEEP needs to value and support DOT in CES.	
Regional Plan Association, CT	11/14/2012	VMT Reduction	Transportation demand management strategies that support commuters need more though and resources in the CES.	

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Regional Plan Association, CT	11/14/2012	VMT Reduction	CT rides program is not adequate to aggressively address transportation demand management. In CT the State Traffic Commission has required some large employers to provide commuter tax benefits that make transit more affordable, perhaps funding/legislation can help this program grow.	
Regional Plan Association, CT	11/14/2012	VMT Reduction	Transportation Demand Management (TDM) strategy in plan needs work. TDM in CT is primarily administered by CT rides. The state can do more to encourage TDM, including: 1) Take advantage of ITS (intelligent transportation systems) to provide information to commuters on alternative modes available during times if highway congestion; 2) Implement congestion pricing as a component of transportation demand management. Dynamic road pricing can help commuters choose transit as their transportation mode when ITS is used to help commuters understand options available to them; 3) Allocate additional resources to expand the use of the above strategies.	
Regional Plan Association, CT	11/14/2012	Scope	There is a divide in the report, there are strategies regarding fuel for car-dependent people out of their cars and into transit or bike. This is not a useful division, CES should support Smart Growth Strategies.	
Regional Plan Association, CT	11/14/2012	VMT Reduction	Would like to see a greater recognition that the land use strategies mentioned will also reduce VMT for those continuing to rely on vehicles for their daily transportation and make CT more resilient to fuel shocks	
Regional Plan Association, CT	11/14/2012	Scope	Looks forward to supporting implementation of the final CES.	
Sierra Club	12/21/2012	Scope	The CES process affords an important opportunity to take stock of the progress CT has made to date in achieving its long-term energy goals, including those set forth in the RPS, GWSA, PA 08-98, and to articulate a strategy for helping the state reach these and other energy goals.	
Sierra Club	12/21/2012	Scope	Given the life cycle climate and environmental harms surrounding natural gas extraction and combustion, rather than promoting CNG and LNG at this time, transportation funding is more beneficially targeted to promote electric vehicles, whose environmental attributes will continue to improve as the region reduces the carbon intensity of its electrical power generation.	

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Sierra Club	12/21/2012	Alternative Fuel Vehicles	Recommends that the final plan maintain recommendations that promote TOD and that continue to stress the importance of adopting CA's state-level clean car standards.	
Transit for Connecticut	11/14/2012	Fleets, public rail transit, ground freight and outreach	Thanks DEEP for CES, supports Transportation Recommendations and urges continued coordination with CTDOT to increases transportation service in the state.	
Transit for Connecticut	11/14/2012	Scope	Looks forward to next steps of CES, would like to see outlined implementation strategies for recommendations.	
Transit for Connecticut	11/14/2012	Fleets, public rail transit, ground freight and outreach	Increase and improve transit option in state to ease congestion, reduce GHG emissions and fuel consumption. Increasing transit services also supports the goals of the CT Climate Action Plan, to double ridership levels statewide by 2020 and a corresponding reduction in VMT.	
Transit for Connecticut	11/14/2012	Infrastructure Investment	They have updated and included their 2007 "Bus Needs Analysis" (a summary that includes a 5-year funding plan with the potential to increase bus ridership by 64%).	
Tri-State Transportation Campaign	11/14/2012	Fleets, public rail transit, ground freight and outreach	Supports DEEP's plan to encourage public transit, multimodal approach to streets, and TOD.	
Tri-State Transportation Campaign	11/14/2012	VMT Reduction	Not enough detail given to VMT reduction (compared to attention to clean fuel/clean vehicle.	
Tri-State Transportation Campaign	11/14/2012	VMT Reduction	Would like to see a menu of VMT reduction options that has clearer calculations of how each policy option would reduce VMT and emissions. Would also like to see recommendations and action steps from DEEP/DOT.	
Tri-State Transportation Campaign	11/14/2012	VMT Reduction	Would like to see congestion pricing included in CES.	
Tri-State Transportation Campaign	11/14/2012	Scope	Would like to see a clearer focus on the state's overall transportation spending priorities, with specific emphasis on roar repair and maintenance and a recognition that new road projects would counteract efforts to reduce VMT. Would like to see (based on the analysis of the state's transportation improvement program) the amount of state spending on biking and pedestrian projects increase (from 1.1%).	

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Tri-State Transportation Campaign	11/14/2012	Fleets, public rail transit, ground freight and outreach	CES notes that funding for sewers and other infrastructure could be focused to allow for high-density development in the state's transit corridors. Supports this concept and would like more details.	177
Tri-State Transportation Campaign	11/14/2012	Fleets, public rail transit, ground freight and outreach	Would like more funding for pedestrian and bicycle improvements near transit stations.	
Tri-State Transportation Campaign	11/14/2012	Scope	Believes the state needs to explore new sources of transportation revenue especially given the current federal environment.	
UIL Holdings (CNG, SCG and UI Company)	11/14/2012	Infrastructure Investment	A firm rate for NGV station operators could support a portion of the required capital investment in the station. Such actions reintroduced LEC's into the ownership f certain NGV equipment. But such ownership should be limited in scope and not be the full station ownership.	
UIL Holdings (CNG, SCG and UI Company)	11/14/2012	Alternative Fuel Vehicles	UIL Holdings Corp. supports the clean vehicle and clean technology platform for natural gas conversion for fleet and infrastructure pilots for LNG, CNG, and electric stations for fuels, for vehicles as well as other fuels.	
UIL Holdings (CNG, SCG and UI Company)	11/14/2012	Infrastructure Investment	Agrees to establish the natural gas infrastructure network for commercial/industrial fleet customers, the buildings should be simplified for gas LDC's and for customers interested in implementing NGV purchasing policy with an uninterrupted rate.	
UIL Holdings (CNG, SCG and UI Company)	11/14/2012	Alternative Fuel Vehicles	Creating an interagency working group, similar to the EVIC for alternative fuel vehicles will identify, make changes in a more efficient way and will support a consistent message and plan for the industry. This group could also work through some of the challenges such as incentives, education, taxes, and process improvements.	
UIL Holdings (CNG, SCG and UI Company)	12/21/2012	Alternative Fuel Vehicles	The charter of the Electric Vehicle Infrastructure Council should be broadened and reinvigorated to include all AFVs.	
UIL Holdings (CNG, SCG and UI Company)	12/21/2012	Alternative Fuel Vehicles	Rate design changes are necessary for both electric and gas fueling station applications to further advance investment in AFV infrastructure.	

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UIL Holdings (CNG, SCG and UI Company)	12/21/2012	Alternative Fuel Vehicles	To move past the early adoption phase, more education and outreach is needed for CT residents and fleet owners to make a choice of what AFV meets their needs based on their availability, fuel type, and infrastructure.	
UIL Holdings (CNG, SCG and UI Company)	12/21/2012	Alternative Fuel Vehicles	The creation of an interagency workgroup will result in a more cohesive approach to identifying and implementing policies that support a consistent message and plan for the AFV industry in CT. An item the group should address is the reintroduction of incentives and rebates that will help increase the sales of AFVs, as well as develop education and outreach materials.	
UIL Holdings (CNG, SCG and UI Company)	12/21/2012	Alternative Fuel Vehicles	Supports CT's clean vehicle and clean technology platform for NGV conversions for fleets and infrastructure pilots for LNG, CNG, and electric stations for AFCS (and other fuels, such as propane). Both CNG and SCG are also investing in their aging natural gas vehicle fueling stations located at their respective operation centers, and adding new NGVs to the fleet in 2013.	
UIL Holdings (CNG, SCG and UI Company)	12/21/2012	Alternative Fuel Vehicles	In 2013, UIL will explore the possibility of BEVs and PHEVs within the fleet based on driving range, costs, emissions, and performance during storm response.	
UIL Holdings (CNG, SCG and UI Company)	12/21/2012	Alternative Fuel Vehicles	Rate design changes are necessary for both electric and gas fueling station applications to further advance investment in AFV infrastructure. CNG and SCG recommend that NGV fuel station rates be based on firm service, cost-based rates rather than a value-of-service, interruptible rate linked to the price of gasoline. Billing NGV station operators on a firm rate could also support a portion of the required capital investment in the station. UI recommends that new EV tariffs for Level 2 and 3 stations also be developed.	

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UIL Holdings (CNG, SCG and UI Company)	12/21/2012	Alternative Fuel Vehicles	UI supports the interest in looking at the potential costs, tariffs, timeframe, and benefits of the build-out of an additional 50 publically available Level 2 and 10 Level 3 charging stations. UI does believe the majority of EV charging will be at home during off-peak hours. UI would consider owning, maintaining, and selling electricity for public stations in a limited pilot basis, but believes the market needs to increase its investment of building privately owned public charging station. CNG and SCG believe that NGV fueling station investments should primarily be owned and operated by the private sector, but would consider limited investments that further public policy objectives such as the I-95 and I-91 corridor initiative.	
UTC Power	12/14/2012	Alternative Fuel Vehicles	Many of the goals outlined focus solely on electric and NG fueled vehicles and fleets. These goals inadvertently leave out the success of the CT fuel cell bus fleet at CT Transit.	
UTC Power	12/14/2012	Alternative Fuel Vehicles	As part of the Department's investigation into the short- and long-term cost effectiveness of different alternatively fueled technologies, impact on the grid should be considered, in conjunction with electric vehicles. In order to keep electric vehicles as a viable option in the transportation sector, the State may consider installing base load distributed generation, like fuel cell systems, at the larger fleet level charging stations. This would help minimize the load on the grid introduced at the charging stations.	
VNG.CO	12/14/2012	Alternative Fuel Vehicles	The draft CES provides very little consideration of light-duty NGVs, and fails to recognize the rapidly changing opportunities in this sector.	
VNG.CO	12/14/2012	Alternative Fuel Vehicles	Biggest Market Opportunity: Light-duty natural gas vehicles.	

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VNG.CO	12/14/2012	Alternative Fuel Vehicles	Growing Potential: Automakers are bringing new light-duty NGVs to the U.S. market after selling over 15 million in overseas markets like Italy and Germany. And, a recent, comprehensive report on alternative fuels and vehicle technologies by the National Petroleum Council of the U.S. Department of Energy found light-duty NGVs to have potential for “larger, earlier, and faster” impacts than other light-duty alternatives like electric vehicles.	
VNG.CO	12/14/2012	Alternative Fuel Vehicles	Natural Gas Vehicles are the Only Alternative for Light Trucks.	
VNG.CO	12/14/2012	Alternative Fuel Vehicles	Bridge to Hydrogen and Biogas: Because of numerous vehicle and refueling synergies between Natural Gas Vehicles (NGV) and hydrogen fuel cell vehicles, NGVs are an essential “bridge” to hydrogen transportation.	
VNG.CO	12/14/2012	Alternative Fuel Vehicles	Natural Gas Vehicles Demand Supports Gas Distribution Investments: Natural gas fueling stations can serve as “anchor tenants,” helping to enhance the economic case for expanding natural gas distribution networks in the state.	
VNG.CO	12/14/2012	Alternative Fuel Vehicles	Light-Duty NGV Market Not Effectively Served By Heavy-Duty Fueling.	
VNG.CO	12/14/2012	Alternative Fuel Vehicles	Instead of diverting state support to heavy-duty refuse truck fleets that already have a compelling economic alternative without need for government assistance, Connecticut policymakers have an opportunity to play a much more constructive role in catalyzing the light-duty NGV market. This catalytic support does not require large new long-term subsidies, and in many cases can be provided by building on the proposals included in the draft CES and the multi-state Memorandum of Understanding (“MOU”) on NGVs that Connecticut has signed.	

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VNG.CO	12/14/2012	Alternative Fuel Vehicles	NGV Pilot Programs: The draft CES describes potential incentives for "NGV Pilot Programs" that would support conversions of fleets to NGVs as well as the buildout of public-access LNG/CNG stations. This program should be open to light-duty fleets, and preferentially fund projects with fueling that is not only public-access but that provides convenient, retail access for light-duty vehicles. To ensure that incentive funding isn't wasted, DEEP should focus funding on vehicles, not infrastructure, and carefully evaluate whether or not the conversion of applicant fleets would be economically viable without subsidies.	
VNG.CO	12/14/2012	Alternative Fuel Vehicles	Conversion of Public Light-Duty Fleets: Connecticut is one of 28 states participating in a MOU signed earlier this year under which states agreed to purchase light-duty NGVs for their own fleets. An initiative to begin converting a portion of Connecticut's nearly 12,000 public light-duty fleet vehicles to natural gas will save taxpayers money and stimulate private investment in retail-oriented, light-duty CNG fueling.	
VNG.CO	12/14/2012	Alternative Fuel Vehicles	FCV Research and Development: As proposed in the draft CES, the state should continue pursuing opportunities for federal funding for FCV R&D. In particular, it may benefit both NGV and FCV deployment to pursue federal funding for projects combining CNG and hydrogen fueling at single fueling locations, with hydrogen potentially produced from natural gas via steam reforming or trigeneration (heat, power, and hydrogen) fuel cell systems.	

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VNG.CO	12/14/2012	Alternative Fuel Vehicles	By pursuing targeted policies in support of light-duty NGV fleets, Connecticut can catalyze a self-sustaining market for NGVs in the state. Light-duty fleets will support private sector investments in light-duty oriented CNG fueling networks in the state, which will in turn further encourage NGV demand and reduce vehicle incremental costs. This virtuous cycle will establish Connecticut as one of the initial centers of NGV market development, giving the state's businesses and residents a competitive advantage for realizing the economic and environmental benefits of fueling on natural gas.	
VNG.CO	12/14/2012	Alternative Fuel Vehicles	Supports use of light-duty natural gas vehicles	
VNG.CO	12/14/2012	Alternative Fuel Vehicles	Bridge to Hydrogen: Natural gas vehicles have long been recognized as an important "bridge" to hydrogen fuel cell vehicles due to the numerous synergies between these gaseous fuel technologies	
VNG.CO	12/14/2012	Alternative Fuel Vehicles	Includes key synergies why natural gas vehicle technology will link to hydrogen	
VNG.CO	12/14/2012	Alternative Fuel Vehicles	Building a Market for Second Generation Biofuels: The deployment of light-duty natural gas vehicles and the development of robust fueling networks for CNG also creates the foundation for harnessing Connecticut's biogas resources	
VNG.CO	12/14/2012	Alternative Fuel Vehicles	They believe that the private sector will make the necessary investment in refueling stations without need for infrastructure subsidies – provided that there are sufficiently large numbers of NGVs in a given geographic market. State policymakers must accordingly offer support for light-duty natural gas vehicles – not just heavy-duty projects with a 'public access' component to fueling – to develop the light-duty CNG fueling needed to provide true consumer choice and maximize the potential benefits of natural gas transportation.	
VNG.CO	12/14/2012	Alternative Fuel Vehicles	To ensure that incentive funding isn't wasted, DEEP should focus funding on vehicles, not infrastructure, and carefully evaluate whether or not the conversion of applicant fleets would be economically viable without subsidies.	

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VNG.CO	12/14/2012	Alternative Fuel Vehicles	Conversion of Public Light-Duty Fleets: Connecticut is one of 28 states participating in a Memorandum of Understanding signed earlier this year, under which states will jointly purchase light-duty NGVs for public fleets.	
VNG.CO	12/14/2012	Alternative Fuel Vehicles	DEEP's proposal for PURA's use of firm rates for natural gas transportation fuel is a good one, and will help encourage private investment in natural gas fueling. Moreover, the CES proposal for utility-funded extensions of gas mains to "anchor tenants" should be extended to CNG fueling stations, since these investments will catalyze significant, long-term, year-round gas demand.	
VNG.CO	12/14/2012	Alternative Fuel Vehicles	Fuel Cell Vehicle (FCV) Research and Development: As proposed in the draft CES, the state should continue pursuing opportunities for federal funding for FCV R&D. In particular, it may benefit both NGV and FCV deployment to pursue federal funding for projects combining CNG and hydrogen fueling at single fueling locations, with hydrogen potentially produced from natural gas via steam reforming or trigeneration (heat, power, and hydrogen) fuel cell systems.	
Barbara Sterling Blackman	12/4/2012	Fleets, public rail transit, ground freight and outreach	Public transportation in all forms should be promoted - sidewalks, bike lanes, streetcars, trains and buses. A smart growth policy is also critical to smart energy strategy.	
James Matthew Callahan	10/10/2012		The state should implement a new highway maximum speed limit based on the metric system of 100km/h (62 mph) to conserve fuel, save lives, and protect our environment.	
James Matthew Callahan	11/23/2012	Alternative Fuel Vehicles	Train stations should be recharging stations for EV's.	
James Matthew Callahan	11/23/2012	Infrastructure Investment	The Waterbury rail line should be operated on natural gas not diesel fuel.	

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Dan Fischer	12/18/2012	Scope	CES falls short of meeting CT's statutory emissions reductions goals, and far short of science-based and justice-based goals. The CES admits in the Executive Summary that 'significant additional measures and breakthrough technologies will be required to achieve the goal' of cutting CO2 emissions even 10% below 1990 levels by 2020. The CES should not only include these 'significant additional measures' but commit to at least the targets in the People's Agreement of the World's People Conference and the Rights of Mother Earth. This means 50% below 1990 levels by 2017 and 300 ppm of GHG.	
Dan Fischer	12/18/2012	Scope	CT's statutory 10% by 2020 target, which the CES does not meet, was not created by environmentalists. To the contrary, it came from a 2003 NY GHG Task Force report commissioned by NY Republican Governor Pataki. The Task Force included members of JP Morgan Chase, Ford Motor Company, the natural gas company Niagara Mohawk and coal company Reliant Energy. These are not environmentalists. That 2003 report admitted that even this reduction "would be insufficient to...stabilize CO2 concentrations at the 450ppm or 550ppm levels and prevent serious climate change."	
Dan Fischer	12/18/2012	Scope	Social movements across the Global South gathered in 2010 at the World People's Conference on climate change and demanded that industrialized countries cut co2 emissions at least 50% below 1990 levels by 2017, in line with global atmospheric co2 level of 300 ppm. This is a target in line with what science and human rights demand. It is what his generation and future generations demand. The CES regrettably does not even come close to coming close to coming close.	
Laurie Gianotti (DEEP)	12/3/2012	Infrastructure Investment	Supports "Expanded bikeways and a broader mobility focus that encourages bikeways, walking paths, and other quality of life investments." Supports "Sufficient EV charging stations (about 100 statewide) so that no one in the state need suffer from 'range anxiety"' Supports "Expanded hydrogen filling stations as demand for fuel cell powered vehicles grows."	

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Laurie Gianotti (DEEP)	12/3/2012	Infrastructure Investment	When planning any new transportation related 'structures' such as new gas lines or vehicle charging stations, alternative modes of transportation (bike-pedestrian) should be incorporated.	
Laurie Gianotti (DEEP)	12/3/2012	Scope	Supports "secure funding for transportation infrastructure in support of reduced road congestion, improved air quality, and a strengthened platform for economic growth and job creation."	
Laurie Gianotti (DEEP)	12/3/2012	Infrastructure Investment	Suggests that DEEP and DOT continue to support the National Recreational Trails and Transportation Alternatives programs under the recently authorized MAP-21 funds.	
Mitch Kennedy	12/21/2012	Alternative Fuel Vehicles	Suggests watch "GasHole" and then read "Ethanol can be a Gas" by David Blume. We can create a regenerative, locally sourced fuel industry here that also supports aquaculture and farming.	
Mitch Kennedy	12/21/2012	Fleets, public rail transit, ground freight and outreach	Need to re-focus on mass-transit - rebuild the system of trolleys. Notes that specific demographics needs need to be met.	
Mitch Kennedy	12/21/2012	Alternative Fuel Vehicles	CES should include biodiesel.	
BJ Lambert	12/13/2012	VMT Reduction	Should contain more robust recommendations. There should be specific state policies to promote TOD. Cleaner fuels and electric cars can make the state's existing transportation patterns more environmentally friendly.	
Tina Lichtenberger	9/20/2012	Alternative Fuel Vehicles	Encourages DEEP to support programs in CT that will promote Electric Vehicles.	
Dolores Marchese	12/17/2012	Scope	Please make the CES plan, which is good, even better by emphasizing our need for all the environmental changes that will make our state healthier for everyone. The cleaner air, water, soil, and less cars on the road through use of more and better public transit are all benefits of a stronger legislation.	
Kenneth Nelson	11/14/2012	Alternative Fuel Vehicles	Are biodiesel, biogas, and other similar fuels being directly left out of the CES?	

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Rich Raport (DEEP)	11/6/2012	Fleets, public rail transit, ground freight and outreach	Comments on the barriers to biking/walking, and would like to see that these options are safe: a) would like police to enforce traffic laws over cyclists (DEEP can start a dialogue with Hartford police); b) drivers who cause fatalities to bikers/walkers should be more strictly punished.	
Susan Rowan	12/12/2012	Alternative Fuel Vehicles	Propane should be included in the CES.	
Gary L. Steinman	12/13/2012	VMT Reduction	It is unclear to him whether the plan takes full advantage of available VMT reduction opportunities. The CES assumes that the automobile is and will remain a way of life in CT. TOD will encourage people to use nearby mass transit rather than their cars. Believes there is significant interest among urban developers and architects in developing communities that are TOD.	
Kevin T. Sullivan (DEEP)	10/16/2012	VMT Reduction	Pursue changes to Qualified Transportation accounts under IRS tax rules (would require action at the federal level) including: a) allowing biking commuters to set aside pre-tax income for biking expenses (currently not allowed, but is for parking, transit, and carpooling); b) make equal the amounts employees may set aside for car parking and public transit and carpooling expenses, currently parking is allowed more; c) car parking should be removed from this benefit allowance.	

Appendix F: Post-Draft Comments

Citizens (identified signees to form letter)

Pippa Bell	Ader
Lois	Aime
Anton	Backer
Donna	Baker-Gilroy
Andy	Bauer
JoAnne	Bauer
Colin	Bennett
Jana	Bertkau
Diana	Black
Ellen	Bompane
Robert	Botelle
Clare	Brady
William	Bray
Dan	Britton
Jessica	Brockington
Christine	Brooks
David	Brown
Becky	Bunnell
John	Callahan
Dave	Cappello
Paul	Carnes
Lori	Carpenos
Rev. Tom	Carr
Ellen	Castaldini
Edward	Chiucarello
Nevin	Christensen
Denise	Clapsaddle
John	Coghill
Howard	Cohn
Mary	Consoli
Noreen P.	Cullen
Janet	Cunningham
Lynn M.	Dallas
Helen	Daly
Linda	Dente
Robert	Dente
Robert	Dickinson
Elizabeth	Doll
Lucie	Douglas
Elaine	Dove
Jon	Ellis
Peter	Ellner
Christopher	Frey
Lynn E.	Frey
David	Gilroy
William	Glickman
Cate	Grady-Benson
Zazu	Gray
David	Green
Libby	Groff
Amy	Harrell
Ernest	Harris
Michael	Harris
Maureen	Hart
Derek	Haviland
John	Ho
Marianne	Horn

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Citizens (identified signees to form letter)

Michele	Jenks
Michael	Jordan
Etta	Kantor
Martin	Kaplan
Eva	Kaufman
Jane	Kellner
Sean	Kennedy
Melanie	Klein
Mark	Knobloch
Simon	Kortleven
Steve	Kraffmiller
Susanne	Krivit
Julie	Kushner
Shakti	Lane
Leesa	Lawson
Seth	Lotterman
Henry	Lowendorf
Linda	Lucchesi
Debbie	Lundgren
Thomas	Magro
Michelle	Mallette
David	Mann
Benjamin	Martin
Pam	McDonald
Frederick	McKeehan
Letty	McPhedran
Cindy	Moeckel
Antonia	Nabholz
Veda	Napoletano
Elizabeth	Neuse
Steve	Newberg
Robert	Nixon
Hillary	O'Leary
Carole	Osborn
Ken	Owen
Harvey S.	Picker
Daniel	Proctor
John	Rountree
Eszter	Samodai
Anne	Schick
Georgina	Scholl
Margaret	Sellers
Steve	Shapiro
Virginia	Shaw
Iris	Slotkin
Katie	Sterrett
Danielle	Stordy
James	Stratos
Rose Mary	Sullivan
Eric	Taylor
Margaret	Toto
Michael	Toto
Norine	Tripp
Francine	Ungaro
Susan	Virostek
Elizabeth	Vitale
Lynn Stack	Wehrmann
Stephanie	Weiner
Howard	Weiss
Marcia	Wilkins
Catherine	Worthley