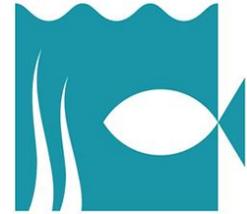




**Connecticut Fund
for the Environment**



Save the Sound®
A program of
Connecticut Fund for the Environment

**Testimony of Connecticut Fund for the Environment
Before the Energy and Technology Committee**

In support of

H.B. No. 7009, AN ACT CONCERNING ELECTRIC AND ZERO-EMISSION VEHICLES,
H.B. No. 6838, AN ACT CONCERNING THE ENCOURAGEMENT OF LOCAL ECONOMIC
DEVELOPMENT AND ACCESS TO RESIDENTIAL RENEWABLE ENERGY, and
S.B. No. 928, AN ACT CONCERNING SHARED CLEAN ENERGY FACILITIES

In opposition to

H.B. No. 6940, AN ACT ESTABLISHING A SHARED CLEAN ENERGY FACILITY PILOT
PROGRAM

Submitted by Shannon Smyth
Energy & Environment Attorney
March 16, 2015

Connecticut Fund for the Environment (CFE) is a non-profit environmental organization with over 5,500 members statewide. The mission of CFE, and its bi-state program Save the Sound, is to protect and improve the land, air, and water of Connecticut and Long Island Sound. We use legal and scientific expertise and bring people together to achieve results that benefit our environment for current and future generations.

Dear Senator Doyle, Representative Reed, and members of the Energy and Technology Committee:

Connecticut Fund for the Environment submits this testimony in support of H.B. No. 7009, An Act Concerning Electric and Zero-Emission Vehicles, H.B. No. 6838, An Act Concerning the Encouragement of Local Economic Development and Access to Residential Renewable Energy, and S.B. No. 928, An Act Concerning Shared Clean Energy Facilities, and in opposition to H.B. No. 6940, An Act Establishing a Shared Clean Energy Facility Pilot Program. The three bills we support would help Connecticut reduce greenhouse gas emissions and local air pollution and achieve its clean energy and climate goals by supporting clean, renewable sources of energy and establishing policies that would encourage drivers to choose electric vehicles and other zero-emission vehicles.

I. Incentives for electric and zero-emission vehicles and policies that incorporate them into long-term planning will help Connecticut become a leader in clean transportation.

Connecticut should pass legislation encouraging drivers to choose electric vehicles (EVs) and other zero-emission vehicles (ZEVs) by creating policies that integrate these vehicles into the state's long-term planning and development of infrastructure. H.B. 7009, An Act Concerning Electric and Zero-Emission Vehicles, will move Connecticut closer to meeting its clean energy and climate commitments under the Global Warming Solutions Act, the Clean Cars Act, and the State Zero-Emission Vehicle Programs Memorandum of Understanding. It is time for Connecticut to follow

through on these promises and take definitive action to become a national leader in promoting ZEVs, reducing greenhouse gas emissions, and transitioning to a clean energy future.

Connecticut Fund for the Environment (CFE) strongly supports H.B. 7009, which has the stated purpose of “prepar[ing] electric distribution companies, municipalities, public and private merchants, and electrical contractors for the presence and operation of electric and zero-emission vehicles in the state.” In addition to expressing our support for the bill, we offer the following comments and recommendations.

Section 2, which would require the Department of Motor Vehicles (DMV) to record the number of EVs registered in Connecticut and make this information publicly available, is needed to ensure that the public, businesses, auto retailers, and electric utilities have accurate data about the number of EVs in the state. DMV already collects this information and should be able to make the data available to the public.

Section 3 would authorize ZEVs to park for free at any public metered parking space (excepting spaces reserved for handicapped parking). New Haven already has a similar program. This provision would create an incentive for more drivers to lease or purchase ZEVs, especially people who live in congested urban areas where parking is hard to find or expensive. It makes sense to include a sunset provision because this incentive will no longer be needed when ZEVs have become commonplace. The proposed sunset date of December 31, 2020 is a good estimate, but should be extended if ZEVs have not significantly penetrated the market by that time.

Section 5 would clarify that the state’s existing statutory definitions for “utility”, “public utility”, and “public service company” do not apply to EV charging stations. This provision is needed to ensure that EV charging stations are not subject to (a) regulatory uncertainty regarding their legal status, or (b) regulatory requirements intended for other types of facilities, which could impose an unnecessary burden on EV charging stations and hinder the build-out of additional infrastructure.

Section 6 would distinguish between public and private EV charging stations and require time of day rates for both types of stations. Section 6(b), which would require time of day rates for EV charging stations, should be implemented because it would incentivize EV owners to charge their vehicles when electricity use is low (*e.g.*, at night). This would reduce demand on the grid, thereby increasing grid resilience. It would also encourage more drivers to lease or purchase EVs by reducing the cost of charging at certain times of day.

Section 7 would require electric distribution companies to integrate EV charging load projections into their distribution planning. This provision is needed to ensure that such companies adequately prepare for the increased use and charging of EVs in Connecticut.

Section 8 would require the Integrated Resource Plan to consider the potential for EVs to provide battery storage and other services to the grid, and ensure that the grid is prepared to support increased EV charging. Like Section 7, this provision is needed to facilitate a smooth transition as Connecticut moves away from gasoline-powered vehicles and toward electrification. Moreover, requiring consideration of EVs in the state’s comprehensive biennial plan will ensure a holistic approach in which EVs are incorporated into Connecticut’s long-term energy strategy.

Section 10 includes requirements for private EV charging stations, including multiple payment options, disclosure of information to a federal database, parking restrictions, and time restrictions, as well as a ban on membership-only stations. Parking and time restrictions should be implemented to ensure that spaces with charging equipment are limited to EVs that are using the

equipment. This would prevent non-electric vehicles from parking in these spaces and require EVs to park elsewhere when they are finished charging, which would free up charging equipment and make it easier for EVs to access charging stations when they need them.

Section 11 would require the Building Code to be amended to facilitate the installation of EV charging stations. Section 11(c)(2), which requires an official interpretation of the Building Code to streamline municipal permitting requirements for the installation of EV charging stations, would make it easier for residents and businesses to install EV charging equipment.

In conclusion, CFE strongly supports H.B. 7009 and looks forward to engaging with other stakeholders and policymakers as Connecticut proceeds with policies that will encourage the use of electric and zero-emission vehicles and prepare the state for increased vehicle electrification.

II. Creating a solar home renewable energy credit policy would help Connecticut achieve its clean energy goals and produce significant economic and environmental benefits.

CFE supports H.B. 6838, An Act Concerning the Encouragement of Local Economic Development and Access to Residential Renewable Energy. This bill would enable Connecticut to achieve Governor Malloy's new residential solar photovoltaic deployment target of 300 MW by 2022 by driving investment in solar energy. It would create a solar home renewable energy credit policy and help fund the Connecticut Green Bank's Residential Solar Investment Program, which provides incentives for solar deployment in a way that effectively lowers costs.

Putting more solar power and other clean distributed energy resources on the grid provides significant benefits. These clean resources reduce demand on the grid and avoid the need for new generation, peaking generation, and capacity. They also have valuable environmental and climate benefits, because these clean energy resources emit little or no greenhouse gases or other harmful pollutants. Finally, clean distributed energy resources, and solar in particular, provide consumer benefits by stabilizing prices and increasing the value of homes with solar panels.

A solar home renewable energy credit policy would directly support in-state clean energy projects and promote in-state economic activity. At the moment, only a small fraction of Class I market renewable energy credits purchased to meet the state's renewable portfolio standard (RPS) come from generation resources in Connecticut—in 2012, the amount was less than five percent. This means that the economic development benefits of Connecticut's RPS policy are mostly enjoyed by other New England states, and the RPS is not being used effectively as a lever to grow in-state renewable generation. Creating a solar home renewable energy credit policy would help change this situation by promoting job growth and business growth for solar installers in Connecticut, which would generate positive economic ripple effects throughout the state.

III. Shared clean energy facilities would expand Connecticut residents' access to clean energy resources and help the state achieve its climate and energy goals.

CFE supports S.B. 928, An Act Concerning Shared Clean Energy Facilities, which would enable Connecticut residents and businesses to access clean energy resources and help the state achieve its clean energy and climate goals. Despite growing interest and commitment to clean energy resources, many Connecticut residents cannot access them. For example, the majority of Connecticut residents cannot install rooftop solar panels because they are renters, because their rooftops are too shady or otherwise unsuitable, or for other reasons. Allowing the operation of shared clean energy facilities would dramatically expand access to clean energy resources, including solar power and other types of distributed generation (DG) energy resources, such as fuel cells.

Notably, the Connecticut Academy of Science and Engineering (CASE) recently finalized a comprehensive report, *Shared Clean Energy Facilities*,¹ which articulated a suggested approach to the creation of shared clean energy facilities in Connecticut. We strongly support the findings and recommendations of the report. In particular, we want to emphasize the importance of determining the value of clean distributed generation energy resources, which CASE endorsed in its report.

We recommend that H.B. 6023, An Act Concerning Distributed Generation, be incorporated into S.B. 928. Determining the value of solar and other clean DG resources is needed to ensure that consumers and businesses with such resources are fully compensated for the benefits they provide. As CASE acknowledged in its report, requiring a value of clean DG analysis is an essential component of the state's program to authorize shared clean energy facilities.

IV. A shared clean energy facility pilot program is unnecessary and would only delay the implementation of such facilities in Connecticut.

CFE opposes H.B. 6940, An Act Establishing a Shared Clean Energy Facility Pilot Program, because this bill would cause unnecessary delay in implementing a shared clean energy facilities program. As CASE stated in *Shared Clean Energy Facilities*, “the uncertainty created by classifying the new program as a pilot would inhibit project development and investment.”² Moreover, many other states have successfully implemented shared clean energy programs,³ and Connecticut can learn from their experiences. Creating a pilot program would cause unnecessary delay and prevent Connecticut from fully realizing the benefits of shared clean energy facilities.

Thank you for your time and consideration in these matters.

Respectfully submitted,

/s/ Shannon Smyth
Shannon Smyth
Energy & Environment Attorney
Connecticut Fund for the Environment
ssmyth@ctenvironment.org
Tel: (203) 787-0646 ext. 122
Fax: (203) 787-0246

¹ Connecticut Academy of Science and Engineering, *Shared Clean Energy Facilities* (March 2015).

² *Id.* at 44.

³ *Id.* at 15-16.