



August 12, 2013

*Via electronic mail*

Debra Morrell  
Department of Energy and Environmental Protection  
Bureau of Energy and Technology Policy  
Ten Franklin Square, New Britain, CT 06051

Re: Proposed Amendments to Section 22a-174-31 of the Regulations of Connecticut State Agencies (RCSA), Control of Carbon Dioxide Emissions

Dear Ms. Morrell:

On behalf of Northeast Energy Efficiency Partnerships (NEEP) I am pleased to submit comments on the Department of Energy and Environmental Protection (DEEP)'s proposed amendments to Section 22a-174-31 of the RCSA, regarding the control of CO<sub>2</sub> emissions.<sup>1</sup>

NEEP is a regional non-profit whose mission is to serve the Northeast and Mid-Atlantic to accelerate energy efficiency in the building sector through public policy, program strategies and education. Our vision is that the region will fully embrace energy efficiency as a cornerstone of sustainable energy policy to help achieve a cleaner environment and a more reliable and affordable energy system.

We provide comment today in support of the amendments to Section 22a-174-31, which will allow Connecticut to implement the Regional Greenhouse Gas Initiative (RGGI) Updated Model Rule.<sup>2</sup> The amendments, the result of last year's comprehensive RGGI program review conducted by all participating states, will revise Connecticut's 2014 CO<sub>2</sub> base budget and provide for reductions to the budget of 2.5 percent each year through 2020.<sup>3</sup> Collectively, the updated model rule will significantly lower carbon dioxide emissions in the Northeast and Mid-Atlantic region.

The amendments also ensure the prudent use of RGGI allowance proceeds for investments in energy efficiency programs through Connecticut's Conservation and Load Management (C&LM) plans and the Connecticut Energy Finance and Investment

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<sup>1</sup> These comments are offered by NEEP staff and do not necessarily represent the view of the NEEP Board of Directors, sponsors or partners.

<sup>2</sup> Updated Model Rule for 2013, Regional Greenhouse Gas Initiative, [http://www.rggi.org/docs/ProgramReview/FinalProgramReviewMaterials/Model\\_Rule\\_FINAL.pdf](http://www.rggi.org/docs/ProgramReview/FinalProgramReviewMaterials/Model_Rule_FINAL.pdf)

<sup>3</sup> Proposed Changes to the Connecticut CO<sub>2</sub> Budget Trading Program, Section 22a-174-131 of the Regulations of Connecticut State Agencies (RCSA), [http://www.ct.gov/deep/lib/deep/energy/rggi/sec\\_22a-174-31\\_of\\_the\\_rcsa\\_-\\_proposed\\_amendments.pdf](http://www.ct.gov/deep/lib/deep/energy/rggi/sec_22a-174-31_of_the_rcsa_-_proposed_amendments.pdf)

Authority (CEFIA), as outlined in section f(5). Evidence shows that the investment of RGGI proceeds in energy efficiency is truly a win-win, as it provides a significant economic benefit for Connecticut residents and businesses. Research by the Analysis Group found that investments in energy efficiency through RGGI have had net positive economic impacts for Connecticut ratepayers.<sup>4</sup>

The increased investment in energy efficiency that will result from updating Section 22a-174-31 is expected to add \$823 million in net value to the state's economy as a result of customer energy savings.<sup>5</sup> This is the type of innovative policymaking that ensures that the Northeast region can meet its environmental policy goals while promoting economic growth.

Thank you again for the opportunity to comment in this important proceeding and for your work to implement the updated RGGI model rule. The proposed amendments will help Connecticut continue to reduce its CO2 emissions while promoting energy efficiency and affordability. Should you have any questions regarding this or other matters on energy efficiency in the Northeast, please do not hesitate to reach out to me at [jcraft@neep.org](mailto:jcraft@neep.org) or (781) 860-9177 x109.

Sincerely,

Josh Craft  
Manager of Public Policy Analysis  
Northeast Energy Efficiency Partnerships (NEEP)

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<sup>4</sup> See Paul Hibbard, et. al, Analysis Group, "The Economic Impacts of the Regional Greenhouse Gas Initiative on Ten Northeast and Mid-Atlantic States," November 15, 2011, [http://www.analysisgroup.com/uploadedFiles/Publishing/Articles/Economic\\_Impact\\_RGGI\\_Report.pdf](http://www.analysisgroup.com/uploadedFiles/Publishing/Articles/Economic_Impact_RGGI_Report.pdf).

<sup>5</sup> Environment Northeast, RGGI Economic Benefits, June 2013, [http://www.env-ne.org/public/resources/ENE\\_RGGI\\_Economic\\_Benefits\\_20130607.pdf](http://www.env-ne.org/public/resources/ENE_RGGI_Economic_Benefits_20130607.pdf).