

March 7, 2024

Esteemed Chairs Lopes and Gresko,
Members of the Environment Committee:

The Western Connecticut Council of Governments (WestCOG) appreciates the opportunity to comment on Raised Bill 300, *An Act Concerning Natural Gas Capacity and The Renewable Portfolio Standard*. WestCOG's comments on the bill are as follows:

- In addition to studying the supply of natural gas, the state may also review opportunities for moderating natural gas demand. A decrease in demand can have the same impact on natural gas availability and prices as an increase in supply; however, demand management can be more cost-effective than supply expansion.

Space heating is a primary use of natural gas. While replacement of natural gas heating systems with electric heat pumps will reduce demand for natural gas, over time adoption of electric heat pumps will create challenges for the electric grid. (Combined, electrification of space heating and the vehicle fleet is expected double or triple peak electricity demand.)

While some options to mitigate these impacts on the electric grid have been discussed – e.g., generating electricity on-site – consideration should also be given to technologies that improve efficiency in natural gas use, such as natural gas heat pumps. Such technologies can relieve stress on both the electric and natural gas grids, avoiding large ratepayer costs, while delivering significant reductions in greenhouse gas and air pollutant emissions.

Examples of residential natural gas heat pumps include:
[Stone Mountain Technologies Anesi](#) and [Thermolift TC3](#)

Connecticut currently does not support innovative solutions such as these; this is an area the state may wish to explore as part of any study of the natural gas system.

- The bill would strike existing language that ensures that hydropower projects do not cause damage to the state's rivers and riverine ecosystems. This is concerning, given that the federal regulatory process inadequately addresses environmental impacts (or, in the case of an exempt facility, does not address them at all).

The health of the state's rivers should not be traded for energy. A portfolio standard that neither considers nor prevents lasting environmental consequences is not "renewable."

- The bill does not address the inclusion of incinerators in the Renewable Portfolio Standard. Incineration has the highest carbon footprint of any energy source, creating 70% more greenhouse gases emissions per kilowatt-hour generated than the next-worst source, coal. (See [Waste incinerators undermine clean energy goals | PLOS Climate](#).) Connecticut law requires that 4% of its Renewable Portfolio Standard be met by trash incineration. It is hard to understand how this can be reconciled with the state's emissions goals.

Thank you for your consideration.

A handwritten signature in black ink that reads "Francis Pickering". The signature is written in a cursive style with a long horizontal stroke at the bottom.

Francis R. Pickering
Executive Director