Acadia Center
Advancing the Clean Energy Future
430 New Park Avenue • Suite 102 #2032
West Hartford, CT 06110

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

Acadia Center Comments on the 2026-2027 Comprehensive Energy Strategy

To Whom It May Concern:

Acadia Center appreciates the opportunity to comment on the Key Strategic Questions (KSQ) that will guide the development of the 2026-2027 Comprehensive Energy Strategy (CES).

Acadia Center is a non-profit research and advocacy organization committed to advancing the clean energy future by offering real-world solutions to the climate crisis. Acadia Center tackles complex problems, identifies clear recommendations for reforms, and advocates for policy changes that support a low-carbon economy across the Northeast. Acadia Center identifies regional, state, and local improvements that will dramatically reduce carbon pollution and improve quality of life throughout the Northeast.

The KSQs cover a sweeping set of energy issues facing Connecticut residents and businesses across a variety of sectors, many of which were previously contemplated in the Department of Energy and Environmental Protection's (DEEP's) 2022 CES proceeding. Given the breadth and complexity of topics included in the September 17 Notice of Request for Written Comments, Acadia Center strongly recommends that the CES be grounded in clear overarching goals tied to state policy objectives, utilize modeling to evaluate Connecticut's overarching energy needs and pathways, and provide opportunities for stakeholder input that builds on the extensive record developed in the 2022 proceeding. As such, Acadia Cener offers the following general comments on process:

General Process Comments

1. **The 2026-2027 CES should be grounded in clear, overarching goals that are tied to existing state policy objectives.**

   While the September 17 Notice outlines a number of potentially viable strategies for improving affordability, building Connecticut's energy system, and addressing climate concerns, DEEP should set the goals of the CES before it considers specific strategies. Without defined goals, there is no basis for choosing among strategies, weighing tradeoffs, or judging whether the final CES succeeds.

   Many of those goals are already set in law. Executive Order 21-3 directs that the next CES include strategies to "achieve reductions in greenhouse gas emissions from residential and commercial buildings

and industrial processes as needed to enable the state to meet the economy-wide greenhouse gas reduction target for 2030 and 2050 required by the Global Warming Solutions Act."[1] DEEP's own April 2026 Connecticut's Climate Progress report shows the state is not on track to meet them. Under current policies, DEEP projects emissions 34% below 2001 levels by 2030, short of the required 45%. It projects 44% below 2001 levels by 2050, short of the required reduction of at least 80%.[2]

The September 17 Notice does not connect its strategies to these targets. Its twelve key strategic questions span affordability, infrastructure, and climate. Only one of them, KSQ #10, mentions Connecticut's statutory climate goals.[3] The Notice lists broad priorities: affordability, reliability, environmental protection, equity, jobs, and economic growth, but it sets no measurable outcomes for the CES to achieve. Until those outcomes are defined, it is premature to evaluate specific strategies.

Acadia Center recommends that DEEP set clear, measurable goals for the CES that align with existing policy objectives. Those include the GWSA targets of 45% below 2001 levels by 2030 and 80% by 2050, the 100% zero-carbon electricity target codified under Public Act 22-5, and the transportation carbon budget required by Public Act 23-135. DEEP should then use those goals to screen and prioritize strategies.

2. **The 2026-2027 CES should utilize quantitative modeling to develop pathways to decarbonization in accordance with state law.**

As stated above, Connecticut's next CES must include pathways to achieving emissions reduction targets established in the GWSA. While DEEP performed some individual emission reduction quantification and provided some high-level cost estimates associated with the 17 measures evaluated as part of the EPA Climate Pollution Reduction Grant Comprehensive Climate Action Plan (CCAP), there has not been any economy-wide modeling to compare the relative cost-effectiveness of different scenarios designed to achieve the state's emissions reduction targets as outlined in the GWSA. It is not clear if the 2026-2027 CES will utilize new or existing modeling to identify pathways to meeting statutory emissions targets. Quantitative modeling would provide confidence that the CES is putting Connecticut on a path towards meaningful emissions reductions in the buildings, transportation, and energy sectors.

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[1] Executive Order 21-3, December 16, 2021: https://portal.ct.gov/-/media/Office-of-the-Governor/Executive-Orders/Lamont-Executive-Orders/Executive-Order-No-21-3.pdf

[2] Connecticut Department of Energy and Environmental Protection, Connecticut's Climate Progress, April 2026: https://portal.ct.gov/-/media/deep/climatechange/1990-2023-ghg-inventory/deep_climate-progress-report-2026.pdf?rev=e3ebf7766059456ab1371ed2d2e74723&hash=C84B5A53B55CB868BA7D842F7EA0F9AD

[3] Connecticut DEEP, Notice of Request for Written Comments, September 17, 2026: https://www.dpuc.state.ct.us/DEEPEnergy.nsf/c6c6d525f7cdd1168525797d0047c5bf/1a33f5c5765a8b2c85258e75004e4004/$FILE/CES%20Key%20Strategic%20Questions%20-%20Notice%20of%20Request%20for%20Written%20Comments.pdf

Economy-wide modeling is functionally a prerequisite for comprehensive, state-level climate and energy plans. The most recent overarching climate and energy plans in Massachusetts[4], Maine[5], New York[6], Rhode Island[7], Vermont[8] and all included significant modeling efforts that helped to evaluate long-term, economy wide decarbonization systems, energy system transitions, and cost-benefit tradeoffs.

Additionally, even if DEEP's interpretation of the current law is that the agency does not have the legal authority to establish sector-specific GHG reduction targets, economy-wide pathways modeling to inform the development of the CES also provides an excellent opportunity for DEEP to recommend specific sector-specific GHG targets (or sector-specific target ranges) that align with a cost-effective trajectory for achieving Connecticut's overarching economy-wide GHG reduction targets established in law. This effort would provide all stakeholders, ranging from policy makers to advocates, a clearer picture of the magnitude of sector-level transformation needed to support overarching climate targets in the near- and medium-term.

Acadia Center strongly recommends that DEEP perform economy-wide decarbonization pathways modeling for the 2026-2027 CES. If DEEP is unable to do so it should, at a minimum, draw from other quantitative modeling studies. Preexisting modeling to draw from includes other state-specific plans in the northeast mentioned above or more regionally-focused modeling efforts focused on deep levels of economy-wide decarbonization. For example, a 2024 Acadia Center and Clean Air Task Force report[9] examined five deep decarbonization pathway studies that may be instructive for the CES in the absence of bespoke modeling. These include four studies based in New England and one national study that presents results on a state-by-state basis:[10]

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[4] Appendices to the Massachusetts Clean Energy and Climate Plan for 2025 and 2030" https://www.mass.gov/doc/appendices-to-the-clean-energy-and-climate-plan-for-2025-and-2030/download

[5] Maine Pathways to 2040: Analysis and Insights, January 2025: https://www.maine.gov/energy/sites/maine.gov.energy/files/2025-01/Maine%20Pathways%20to%202040%20Analysis%20and%20Insights.pdf

[6] New York Climate Scoping Plan: https://climate.ny.gov/Resources/Scoping-Plan

[7] Rhode Island 2025 Climate Action Strategy: https://climatechange.ri.gov/act-climate/2025-climate-update

[8] Vermont Pathways Analysis Report 2.0, February 11, 2022: https://climatechange.vermont.gov/sites/climatecouncilsandbox/files/2022-03/Pathways%20Analysis%20Report_Version%202.0.pdf

[9] Acadia Center and Clean Air Task Force, The Energy is About to Shift, November 25, 2024: https://acadiacenter.org/resource/the-energy-is-about-to-shift/

[10] Acadia Center previously recommended use of these studies and provided an overview of findings in comments in response to DEEP's February 2025 Notice regarding the Integrated Resources Plan. Acadia Center, IRP Scoping and Transmission Comments, April 2, 2025: https://www.dpuc.state.ct.us/DEEPEnergy.nsf/c6c6d525f7cdd1168525797d0047c5bf/d9de47dbd19dedc185258c60004fb2ba/$FILE/IRP%20Scoping%20and%20Transmission%20Comments%202025-03-31%20Acadia%20Center.pdf

i. Princeton University's Net-Zero America: Potential Pathways, Infrastructure, and Impacts
ii. The Massachusetts Clean Energy and Climate Plan (CECP) for 2050
iii. Energy Futures Initiative and E3's Net-Zero New England: Ensuring Electric Reliability in a Low-Carbon Future
iv. Brattle Group's Achieving 80% Greenhouse Gas Reduction in New England by 2050
v. E3's Massachusetts Department of Public Utilities 20-80 Technical Analysis of Decarbonization Pathways

Without a quantitative foundation, the CES risks recommending strategies that are misaligned with the state's overall objectives. Even if producing new modeling is not possible for this CES, there are several state-specific, regional and national studies that DEEP may draw upon to inform its development.

3. **The 2026-2027 CES should be developed with a robust stakeholder process that builds on the record established in the 2022 CES proceeding.**

Connecticut General Statutes Sec. 16a-3d requires DEEP to prepare a CES every four years. While the state is still operating under the 2018 CES, DEEP initiated a proceeding in 2022 to develop a new CES that included an extensive public process, including several requests for written comments, requests for information, and a series of technical meetings dedicated to specific topics.[11] Although the 2022 proceeding did not result in the issuance of a new CES, it did produce a valuable record of stakeholder feedback that represents a significant investment of time and resources. In 2022, Acadia Center submitted comments on the scope of the 2022 CES,[12] the appropriate role of hydrogen and biofuels,[13] and building thermal decarbonization;[14] presented on the appropriate role of hydrogen in the 2022 CES;[15] and

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[11] CT General Statutes – Section 16a-3d – 2022 Comprehensive Energy Strategy: https://www.dpuc.state.ct.us/DEEPEnergy.nsf/$EnergyView?OpenForm&Start=1&Count=30&Expand=27&Seq=3

[12] Acadia Center Comments on the Scope of Connecticut's 2022 Comprehensive Energy Strategy, March 3, 2022: https://acadiacenter.org/resource/acadia-center-comments-on-the-scope-of-connecticuts-2022-comprehensive-energy-strategy/

[13] Acadia Center Comments on the Appropriate Role of Hydrogen and Biofuels in Connecticut's 2022 Comprehensive Energy Strategy, November 30, 2022: https://acadiacenter.org/resource/acadia-center-submits-comments-on-the-appropriate-role-of-hydrogen-and-biofuels-in-connecticuts-2022-comprehensive-energy-strategy/

[14] Acadia Center Comments on Technical Meeting 4, September 9, 2022: https://www.dpuc.state.ct.us/DEEPEnergy.nsf/c6c6d525f7cdd1168525797d0047c5bf/ef84b80e8dec65bd852588c6004747b3/$FILE/Acadia%20Center_TM4%20Comments.pdf

[15] Acadia Center Presentation on the Appropriate Role of Hydrogen in Connecticut's 2022 Comprehensive Energy Strategy, April 13, 2022: https://acadiacenter.org/resource/acadia-center-presents-on-the-appropriate-role-of-hydrogen-in-connecticuts-2022-comprehensive-energy-strategy/

collaborated with other energy and environmental advocacy groups on comments related to hydrogen opportunities[16] and multiple joint comments on building thermal decarbonization.[17]

The 2026-2027 CES should provide for a similar level of stakeholder participation. Opportunities for public feedback will create a transparent process, help to refine priority issues, and create a venue for a variety of perspectives. In particular, Acadia Center encourages DEEP to solicit feedback from underserved communities and consider strategies to address barriers to participation. DEEP should provide a high-level schedule or plan for further public input opportunities, similar to the proceeding schedules DEEP provided during the 2022 CES process.[18] At a minimum, stakeholders should know if there will be additional opportunities for input and DEEP's anticipated timeline so they can plan accordingly.

Additionally, Acadia Center requests that DEEP clarify how, if it all, it plans to use the record developed in 2022 to inform the 2026-2027 CES. While some of the stakeholder feedback provided during the 2022 proceeding may be dated or no longer relevant, much of the content is still highly pertinent, and there are still opportunities to draw from the prior record.

Comments on Key Strategic Questions

In addition to the above, Acadia Center provides the following comments responding to the specific prompts in DEEP's September 17 Notice of Request for Written Comments. As stated in the General Process Comments above, the KSQs present a thorough list of important and complex issues. In the comments below, Acadia Center provides initial responses to the KSQs and DEEP's prompts, and we look forward to continuing the dialogue on these topics through additional public process.

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[16] Hydrogen Joint Comments from Sierra Club, Conservation Law Foundation, Acadia Center, Eastern CT Green Action, Connecticut Citizen Action Group, and Save the Sound, April 19, 2022: https://www.dpuc.state.ct.us/DEEPEnergy.nsf/c6c6d525f7cdd1168525797d0047c5bf/9c6a1c9fbbbe1df2852588290053cea4/$FILE/2022.04.15%20CES%20Hydrogen%20Joint%20Comments%20of%20Environmental%20Advocates.pdf

[17] Environmental Advocates' Written Comments for 2022 CES Technical Session 3: Building Thermal Decarbonization – Support Strategies, October 7, 2022: https://www.dpuc.state.ct.us/DEEPEnergy.nsf/c6c6d525f7cdd1168525797d0047c5bf/032ebf9ad4b2bb5d8525895e006e34d7/$FILE/Environmental%20Advocates%202022%2010%2007%20Joint%20comments.pdf and https://www.dpuc.state.ct.us/DEEPEnergy.nsf/c6c6d525f7cdd1168525797d0047c5bf/035af15da73b764a852588c600485ab8?OpenDocument

[18] For example, DEEP Revised Notice of Technical Meetings, August 23, 2022: https://portal.ct.gov/-/media/deep/energy/ces/notice-of-technical-meetings-for-ces_revised_8232022.pdf?rev=4b4813629fb14c47b0170483027d6c07&hash=08E778C44F6E6C5913343667685ED9B7

KSQ 1: How can Connecticut improve energy affordability for households, businesses, and communities in the state?

Energy affordability is an especially urgent issue in Connecticut, where the average low-income household spends 18% of its income on energy costs.[19] The CES should evaluate the drivers of high energy costs and put forward long-term solutions to bring costs down for residents and businesses.

Acadia Center offers the following strategies to address KSQ 1:

1. **Preserve and enhance energy efficiency offerings.** Meeting Connecticut's greenhouse gas emissions targets will require rapid weatherization and electrification of the state's building stock.

2. **Target relief where energy burdens are highest.** Prioritizing weatherization and whole-home electrification in low-income, high-emissions housing can reduce both energy burdens and emissions. This will require strategic targeting of homes with the highest energy burdens, which are also more likely to face health and safety barriers such as mold, asbestos, and knob-and-tube wiring. The CES should include plans to comprehensively serve these populations.

3. **Scrutinize and control utility return on equity (ROE).** Acadia Center has long argued that utility returns on equity are significantly higher than they need to be, costing ratepayers billions.[20] While Acadia Center recognizes that setting utility ROE is not within DEEP's purview or the scope of the CES, rising utility profits are a symptom of a broader set of incentives and regulatory structures that govern the behavior and decision-making of investor-owned utilities.

4. **Control transmission costs.** The CES should recommend additional oversight of transmission projects and financing solutions to keep costs down (see KSQ 6 for more detail).

5. **Identify and target energy cost drivers.** Energy affordability is an urgent concern for Connecticut residents and businesses and should be a primary focus of the next CES. As the CES considers strategies to reduce energy costs, it should consider the interconnected factors behind recent price increases, including the impact of consumption and weather on supply costs, international markets, and policy impacts. Acadia Center has compiled several resources on energy cost drivers that examine the role of natural gas in increasing heating costs, the drivers of electricity costs, the cost of natural gas

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[19] U.S. Department of Energy, Low-Income Energy Affordability Data (LEAD) Tool: https://www.energy.gov/cmei/scep/slsc/lead-tool

[20] Acadia Center, How Utility Profits Contribute to Rising Energy Bills, July 7, 2026: https://media.acadiacenter.org/wp-content/uploads/2026/07/18195831/Utility-Profits-Piece_070726_v3.pdf

infrastructure, natural gas price volatility, and the impact of renewables on energy bills.[21] We encourage DEEP to consider these resources in their analysis of affordability solutions.

KSQ 2: How can Connecticut ensure its residents and businesses are informed about their energy choices, have opportunities to meaningfully participate in energy decisions, and are up to date on energy offerings in Connecticut?

Connecticut will not build the infrastructure its energy and climate goals require without the trust and participation of customers and communities. That is especially true in underserved and environmental justice communities. These communities have carried a disproportionate share of the state's energy infrastructure and pollution, and have often been brought into decisions late, if at all. Acadia Center agrees that KSQ 2 is an important consideration for the 2026-2027 CES, and recommends that DEEP place a particular emphasis on providing meaningful participation opportunities for members of underserved and environmental justice communities.

Acadia Center offers the following strategies in response to KSQ 2:

1. **Standardize community engagement across energy decisions and forums.** Across the state, there are several venues where key energy decisions are made, including DEEP, the Public Utilities Regulatory Authority (PURA), and the Connecticut Siting Council, each with their own processes for soliciting public engagement and input. Even within DEEP, practices vary across bureaus and offices, leaving stakeholders to navigate a web of varying practices and requirements for obtaining information and providing input on key processes.

2. **Expand and strengthen compensation for stakeholder participation.** While utility companies can recover the cost of their lawyers and expert witnesses from ratepayers, other stakeholders usually do not have comparable resources, leaving the people most affected by a decision least able to shape it. Connecticut took an important step in Public Act 23-102, which created PURA's Stakeholder Group Compensation Program,[22] which provided resources for environmental justice communities, financial hardship customers, and small businesses. However, this program does not cover DEEP's proceedings, including the development of the CES, Integrated Resources Plan (IRP), the Conservation and Load Management (C&LM) Plan, climate planning, and other critical processes. DEEP should consider whether similar resources might be available to encourage community participation, particularly from underrepresented groups, and compensate them for the valuable perspectives they would provide to

[21] Acadia Center, Fact Sheet Collection: Energy Cost Drivers, January 2026: https://acadiacenter.org/resource/fact-sheet-collection-energy-cost-drivers/

[22] PURA Stakeholder Group Compensation Program: https://portal.ct.gov/pura/public-participation/stakeholder-group-compensation-program---faqs

these proceedings.

3. **Show customers what programs save – not just how much they cost.** The current design of customer energy bills itemizes the cost of energy programs, including energy efficiency, through the public benefits charge but they do not illustrate the benefits these programs provide. This imbalance of information causes fundamental misunderstanding among ratepayers about. There is an abundance of data on these programs – for example the state's energy efficiency program – but the data is not always organized and made publicly available in a manner that lends itself to advocating for the direct consumer cost savings associated with the program.

Key Strategic Question #3: How can Connecticut build upon efforts to ensure equitable sharing of energy costs, pollution, siting impacts, reliability risks, and clean energy benefits?

Acadia Center supports DEEP's call for a clear analysis of who pays, who benefits, and when. We recommend the CES apply that analysis to every major recommendation, not only to equity-specific programs.

Acadia Center offers the following strategies in response to KSQ 3:

1. **Prioritize overburdened communities**. Direct efficiency and electrification investment first to low-income households and underserved and environmental justice communities, where energy burdens and pollution exposure are highest. This is the core of the Next Generation Energy Efficiency approach Acadia Center has recommended across the region.[23]

2. **Support an Energy Equity and Justice Proceeding.** DEEP, PURA, and other regulatory bodies play a critical role in decisions that directly impact underserved and environmental justice communities; however, accessing regulatory processes can be a challenge. A dedicated Energy Equity and Justice Proceeding should be established to fully address these important, interrelated issues such as a review and analysis of existing energy burdens, housing quality and pre-weatherization needs, improvements to income-eligible programs, optimal rate design to promote affordability and electrification in low- and moderate-income households, and other avenues for operationalizing procedural, distributive, contextual, and corrective equity across regulatory forms.[24]

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[23] Acadia Center, Next Generation Energy Efficiency: https://acadiacenter.org/next-generation-energy-efficiency/
[24] Acadia Center, Energy Affordability, Rate Increases, and Regulatory Solutions in Connecticut, October 23, 2024: https://acadiacenter.org/energy-affordability-rate-increases-and-regulatory-solutions-in-connecticut/#_ftn4

Key Strategic Question #4: How can modernized rate design in Connecticut send appropriate price signals and allocate costs fairly?

Recognizing that PURA plays a central role in rate design, there are still opportunities for the CES to set clear policy objectives that will move Connecticut towards innovative rates that encourage electrification and reward flexible use of the grid.

Acadia Center offers the following strategies in response to KSQ 4:

1. **Expand and enhance time-of-use (TOU) rates and other time varying rate structures as metering allows.** One of the strategic questions under KSQ 4 asks "Whether rates can reasonably reflect the costs of using the energy system at different times and locations…" The evidence is clear that they can while delivering real benefits for ratepayers, including lowering system costs by reducing peak demand, enabling better grid utilization, providing additional savings opportunities for customers, and reducing emissions. Acadia Center has weighed in extensively on the design and rollout of TOU rates in other states, including Maine[25] and Massachusetts.[26]

2. **Adopt a heat pump rate.** Where delivery costs are recovered mostly per kilowatt-hour, customers who heat with electricity can pay far more toward network costs than they add to them. That is especially true in winter, when New England's summer-peaking system has spare capacity. Acadia Center has supported investigations into heat pump rates in other states, including Massachusetts and Rhode Island, which found that, in Rhode Island, for instance, heat pump customers are overpaying by an average of $902 per year.[27] Massachusetts regulators have approved seasonal heat pump rates for all three of the state's electricity utilities that could serve as a model for Connecticut.[28] The CES should recommend heat pump rates for both Connecticut electric distribution companies, informed by a Connecticut cost-of-service study.

3. **Complete the value of distributed energy resources (VDER) study as required by Public Act 19-35.** Accurately valuing the locational- and time-value of distributed energy resources (DER) is essential for informing conversations around the costs and benefits of distributed energy. Public Act 19-35 requires

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[25] Acadia Center Comments on OPA Straw Proposals, January 13, 2026: https://mpuc-cms.maine.gov/CQM.Public.WebUI/MatterManagement/MatterFilingItem.aspx?FilingSeq=132744&CaseNumber=2025-00176 and Joint Comments of Climate Advocates, August 31, 2026: https://media.acadiacenter.org/wp-content/uploads/2026/09/18195758/DPU-26-62-Climate-Advocates-Joint-Comments-correctedv2.pdf

[26] Acadia Center Comments to the Massachusetts Interagency Rates Working Group, November 15, 2024: https://www.mass.gov/doc/irwg-long-term-ratemaking-study-public-comment/download

[27] Providence Journal, Heat pump users in RI are overpaying on electricity by $900 per year, study says, September 8, 2026: https://acadiacenter.org/heat-pump-users-in-ri-are-overpaying-on-electricity-by-900-a-year-study-says/

[28] Petition of NSTAR Electric Company, d/b/a Eversource Energy for Approval of Residential Seasonal Heat Pump Rates, July 29, 2025: https://www.mass.gov/doc/25-55-order/download

DEEP and PURA to study the value of DERs and report findings by July 1, 2020. While DEEP and PURA did initiate a proceeding to this effect in 2019, which resulted in a draft report, a final report has never been produced.[29] Given the lack of finality and the significant time passed since the draft report, the CES should recommend revisiting the VDER study.

4. **Make large loads pay their fair costs.** Data centers require large amount of energy to operate, rely on electricity generated by fossil fuels (either from the grid or backup generators), are frequently located in environmental justice communities, and present other concerns related to grid stability, water use, and noise pollution.[30] The cost impact of data centers is also a growing concern throughout the region. When there is not space on the grid for a new data center to connect at a lower cost than the system average, that data center will likely raise the average cost for everyone, unless specific precautions are taken. These could include utility service agreements specific to large load customers (i.e. large load tariffs), requiring data centers to "bring your own new clean energy" (BYONCE), and enabling energy efficiency and demand flexibility.[31]

Key Strategic Question #5: How can Connecticut address uncertainty in forecasts of future energy needs?

Acadia Center appreciates the importance of addressing uncertainties in forecasts of future energy needs. However, before these uncertainties can be addressed, we would request DEEP clarify which forecasts it plans to use to characterize future need, or alternatively, how it plans to develop those forecasts. As stated in Acadia Center's general process comments above, the CES must be grounded in quantitative modeling in order to adequately address these questions. Without it, it is impossible to answer high-level questions about future energy demand.

To this end, Acadia Center again recommends that DEEP either perform state-specific modeling on this topic or utilize existing modeling studies and explain their rationale for using specific modeling studies/scenarios to inform the CES. For instance, Acadia Center and Clean Air Task Force performed a literature review of five decarbonization pathway modeling studies, which forecasts load growth under a variety of scenarios.[32] In the

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[29] DEEP and PURA Joint Proceeding on the Value of Distributed Energy Resources (19-06-29): https://www.dpuc.state.ct.us/dockhistpost2000.nsf/(Web+Main+View/All+Dockets)?OpenView&StartKey=19-06-29

[30] Acadia Center Explains: Data Centers and Their Energy Impact, Summer 2026: https://media.acadiacenter.org/wp-content/uploads/2026/06/18195843/AC_DataCenters_R4.pdf

[31] Acadia Center Explains: Data Centers and Their Energy Impact, Summer 2026: https://media.acadiacenter.org/wp-content/uploads/2026/06/18195843/AC_DataCenters_R4.pdf

[32] Acadia Center and Clean Air Task Force, The Energy is About to Shift, November 25, 2024: https://acadiacenter.org/resource/the-energy-is-about-to-shift/

absence of state-specific modeling, DEEP may consider using one or more of these studies to inform the development of the CES.

Key Strategic Question #6: How can Connecticut ensure new energy resources to meet the state's needs can be sited, permitted, interconnected, financed, and built?

Acadia Center offers the following recommendations in response to KSQ 6:

1. **Support independent oversight of transmission planning.** Bringing new resources online and serving electrified load will take a large transmission build-out. ISO-NE's 2050 Transmission Study estimates that expanding the system to meet growing peak demand will cost $16 to $26 billion.[33] Yet today, there is almost no public oversight of proposed transmission projects. Transmission owners can advance projects with minimal public review, need not show they chose the most cost-effective option, and earn generous returns on what they spend. Asset condition projects, which replace aging equipment, receive virtually no oversight even though they have the potential to cost the state billions.[34] While ISO-New England has taken the step of implementing an Asset Condition Reviewer (ACR) to evaluate projects, it lacks the decision-making authority required to fully serve as an independent monitor. A better solution would be an Independent Transmission Monitor (ITM), which can act in customers' best interests to ensure transmission lines are constructed and rebuilt in an efficient, coordinated, and accountable manner. There is broad support for the concept among stakeholders, including the New England States Committee on Electricity (NESCOE).[35] Connecticut could continue to work with other states and regionally to strengthen the ACR's capability and to ensure it has teeth, as well as to move to establish a regional ITM role that would have filing rights at FERC and have real oversight over ACPs, providing a forcing function for change. Connecticut, keeping in mind its IRP process that makes it unique from most other New England states, could also strengthen requirements for transmission planning and coordination as part of that IRP development. Connecticut should make sure that transmission and distribution systems are being coordinated in their planning, and think towards broader efforts like Order 1920 transmission compliance, which requires strong inputs from states and localities at the regional level.

2. **Enable public financing of transmission projects.** Meeting Connecticut's climate targets will require significant investment in local and regional transmission infrastructure, which could cost billions of

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[33] Acadia Center Explains: The Need for an Independent Transmission Monitor (ITM), Spring 2025: https://media.acadiacenter.org/wp-content/uploads/2025/03/18201439/AC_ITM_R5.pdf

[34] CT Mirror, Opinion: An independent transmission monitor could cut ratepayer costs, March 25, 2026: https://acadiacenter.org/opinion-an-independent-transmission-monitor-could-cut-ratepayer-costs/

[35] Acadia Center Explains: The Need for an Independent Transmission Monitor (ITM), Spring 2025: https://media.acadiacenter.org/wp-content/uploads/2025/03/18201439/AC_ITM_R5.pdf

dollars. Transmission costs in New England are the highest in the nation. However, the way these projects are financed can result in significant savings. A recent report by Acadia Center and Clean Air Task Force found that replacing private capital with lower-cost public debt and equity could save up to $8.4 billion over the next 40 years, a 43% reduction compared to current practices.[36] The CES should explore alternative financing mechanisms and the policy solutions required to enable them. Acadia Center has been engaging with CT DEEP and the Green Bank on what it would look to enable public financing to happen legislatively in the state. Acadia Center encourages the development of this pathway as a priority, to ensure Connecticut (through one of its state agencies) can enable the authority possible to provide state bonds for transmission projects. This could also happen through the next procurement, or multi-state procurement opportunity (providing public financing as an option through the bidding process, to lower bids and make them more cost competitive).

3. **Initiate and expand procurement of other resources, including long duration storage, energy efficiency, and demand response.** Acadia Center commends DEEP for its efforts to procure new energy efficiency and demand response resources through its 2025 Expanded Efficiency and Affordability Procurement.[37] Acadia Center looks forward to seeing the outcome of that procurement, and other procurements, including the energy storage procurement initiated in March 2026.[38] The CES should recommend that these procurements become a recurring tool to meet peak demand needs in a cost-effective manner.

4. **Streamline permitting.** Connecticut could look towards Massachusetts' recent efforts to combine their permitting requirements across different agencies into one streamlined application. By cross-referencing requirements across different permits and making approvals easier, and combining it into one system of approvals, the siting process becomes more smooth. Another (longer-term) idea is for Connecticut to coordinate with other states to create a 'joint board', made up of state and federal actors, that work to approve large regional projects (such as ACPs) together to coordinate and move the process faster.

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[36] Acadia Center and Clean Air Task Force, A Smarter Way to Pay: Public Financing for Affordable Transmission Development in New England, May 2026: https://media.acadiacenter.org/wp-content/uploads/2026/05/18195909/CATF_SmarterWayToPay_Report_Proof_05.18.26_v2.pdf

[37] DEEP Expanded Efficiency and Affordability Procurement, Notice of Final Request for Proposals, October 1, 2025: https://www.dpuc.state.ct.us/DEEPEnergy.nsf/c6c6d525f7cdd1168525797d0047c5bf/a61e28a37ab00f4a85258d160055a136/$FILE/Notice%20of%20Final%20RFP_%20Expanded%20Efficiency%20and%20Affordability.pdf

[38] DEEP, Notice of Proceeding and Request for Written Comment, March 17, 2026: http://dpuc.state.ct.us/DEEPEnergy.nsf/c6c6d525f7cdd1168525797d0047c5bf/14ba0f3daf9e5f1e85258dbd00682c50/$FILE/Notice%20of%20Proceeding_Energy%20Storage%20Procurement.pdf

Key Strategic Question #7: How can Connecticut address fragmentation in existing planning for electricity, gas, delivered fuels, transportation, and buildings?

As heating and transportation electrify, load will shift from the gas and fuel systems onto the grid. New England's peak demand could as much as double on average between 2020-2050, driven mainly by heat pumps running in the coldest hours.[39] How that load arrives on the grid will determine what it costs. In the near-term, given the summer peaking grid, with proper planning, this new electric load can fill spare grid capacity and spread fixed costs over more sales without increasing peak demand. This will require integrated planning across sectors.

Acadia Center offers the following strategies in response to KSQ 7:

1. **Support a Future of Gas proceeding.** Connecticut needs a Future of Gas proceeding initiated by PURA to consider the future of natural gas service in light of state's emission reduction mandates. Similar proceedings have been undertaken in other New England states, including Massachusetts[40], Rhode Island[41], and Maine[42] for good reason. At its core, a future of gas proceeding is necessary to determine how to best manage the transition away from the natural gas distribution system in a manner that achieves overarching state climate mandates while simultaneously minimizing costs and stranded asset risks associated with the gas distribution system. Without a future of gas proceeding, Connecticut is at high risk of continuing along a "business as usual" trajectory regarding regulation of the gas distribution system that is insufficient to support overarching state climate mandates. Economy-wide decarbonization pathways modeling – as conducted in the Massachusetts and Rhode Island future of gas proceedings – can be instrumental in informing the suite of policies and programs necessary to achieve the scale of gas distribution system transformation in a cost-effective manner. While the initiation of a future of gas proceeding is likely outside the direct authority of DEEP, it's simultaneously essential to accomplish the overarching goals of the CES. Thus, a recommendation to initiate a future of gas proceeding should be one of the core recommendations of the CES.

2. **Conduct more comprehensive energy system planning that looks across fuels and resources to meet customers' energy, capacity, and thermal needs while accounting for climate requirements and impacts.** Connecticut has a significant portion of overlapping gas and electric territory belonging to single utility, which provides an excellent opportunity to implement integrated energy planning.

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[39] Acadia Center and Clean Air Task Force, The Energy is About to Shift, November 25, 2024: https://acadiacenter.org/resource/the-energy-is-about-to-shift/

[40] Investigation Assessing the Future of Natural Gas in Massachusetts (DPE 20-80): https://www.mass.gov/info-details/investigation-assessing-the-future-of-natural-gas-in-massachusetts

[41] Docket No. 22-01-NG - Investigation Into the Future of the Regulated Gas Distribution Business in Rhode Island in Light of the Act on Climate, June 9, 2022: https://ripuc.ri.gov/Docket-22-01-NG

[42] Maine Public Utilities Commission Inquiry Regarding Future of Natural Gas, May 2025: https://mpuc-cms.maine.gov/CQM.Public.WebUI/Common/CaseMaster.aspx?CaseNumber=2025-00145

Integrated energy planning, which aligns planning, assumptions and data sharing across utility fuel verticals, provides substantial efficiency benefits and is a critical tool in reaching state emissions targets that implicate a transition away from gas.[43] For instance, integrated energy planning provides the framework within which a non-pipes alternative analysis can successfully be coordinated across utility verticals to identify viable and cost-effective solutions. Acadia Center has commented on Integrated Energy Planning in other venues, including the recent Rhode Island Energy rate case.[44]

Key Strategic Question #8: How can Connecticut address constraints in workforce, supply chains, institutions, and customer participation that could slow implementation of state energy strategies?

Acadia Center offers the following strategies in response to KSQ 8:

1. **Stable program funding is a workforce policy.** Connecticut's clean energy industries, including energy efficiency, clean energy generation, alternative transportation, clean grid and storage, and clean fuels, employ more than 47,300 workers statewide, and job growth in the sector accounted for 10 percent of all net job growth in Connecticut in 20205.[45] Sustaining the growth of this workforce is critical for the state's economy and will enable the energy transition. Contractors hire and train when they can count on steady demand for programs. Abrupt swings in energy efficiency and electrification budgets can push local businesses and trained workers out of the field and raise costs when programs ramp back up. In light of significant changes to federal energy programs and the elimination of certain clean energy tax credits, the CES should identify ways to fill these gaps and provide stability to these critical industries.

2. **Build stakeholder capacity.** As stated in response to KSQ 2, Acadia Center recommends that this CES include strategies to incentivize and compensate for stakeholder participation, particular from underserved and environmental justice groups.

3. **Create a permanent program for addressing health and safety barriers to weatherization.** Health and safety barriers such as asbestos, mold, vermiculite, and knob-and-tube wiring keep many older homes

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[43] Berkely Lab, Opportunities for Integrating Electric and Gas Planning, January 2025: https://eta.lbl.gov/publications/opportunities-integrating-electric

[44] Benjamin Butterworth, Direct Testimony on Behalf of the Rhode Island Attorney General's Office, April 2026: https://ripuc.ri.gov/sites/g/files/xkgbur841/files/2026-04/2026.04.16%20Direct%20Testimony%20of%20Benjamin%20Butterworth_RIAG%20%28Bates%20001%20-%20033%29.pdf

[45] Energize CT, 2025 Connecticut Clean Energy Industry Report, April 2026: https://www.ctgreenbank.com/wp-content/uploads/2026/07/2025-CT-Clean-Industry-Report-040626.pdf

out of weatherization programs, including as many as 19% of income-eligible homes.[46] The initial Residential Energy Preparation Services (REPS) program provided remediation services to 391 homes, an essential service that enabled them to pursue weatherization. The first iteration of REPS demonstrated the potential of this program and provided some important lessons learned. Acadia Center looks forward to the launch of REPS 2.0 and recommends that DEEP work with stakeholders and peer agencies to identify a sustainable source of funding for this program.

Key Strategic Question #9: How can Connecticut incentivize utility investments in least-cost, most-beneficial alternatives for ratepayers?

Under cost-of-service regulation, utilities earnings are tied to growing their rate base, which incentivizes investments in expensive capital projects at the expense of more cost-effective solutions. As the Legislature recognized in the 2020 Take Back Our Grid Act (Public Act 20-5), performance-based ratemaking (PBR) is an important first step towards addressing this capital expenditure bias and aligning utilities incentives with the public benefit, including with respect to least-cost, most-beneficial alternatives. PURA has been developing a record on this topic for several years, and the final framework continues to be under consideration in PURA docket 21-05-15 and its reopeners. After filing extensive commentary in those proceedings over several years, Acadia Center looks forward to seeing outcomes that financially incentivize utilities to pursue modern and grid-enhancing technologies that can lower costs and benefit both customers and the grid.[47]

Key Strategic Question #10: How can Connecticut make continued progress toward its climate goals amidst changing policies, technologies, costs, land uses, and market conditions?

Changing market and political conditions have certainly impacted energy planning and development nationwide and in Connecticut. However, Connecticut should not retreat from its established clean energy policies and climate commitments.

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[46] Connecticut Energy Efficiency Board, Connecticut HES/HES-IE Single Family Impact and Process Evaluation (R1983), June 3, 2023: https://www.energizect.com/sites/default/files/documents/2023-06-02_Final%20Report_R1983_RES_IMP_HES%2CHES-IE_NMR%2CDNV%2CCDO.pdf

[47] *See* Brief of the Advocates in 21-05-15RE01, https://www.dpuc.state.ct.us/dockcurr.nsf/8e6fc37a54110e3e852576190052b64d/2fdd488ce889230485258c980043d2dd/$FILE/Brief%20of%20the%20Advocates%20RE01%205.27.25.pdf; Brief of the Advocates in 21-05-15RE02, https://www.dpuc.state.ct.us/dockcurr.nsf/8e6fc37a54110e3e852576190052b64d/59ce1e2b2277988785258c97006466a1/$FILE/RE02%20Advocates%20Brief.pdf; Brief of the Advocates in 21-05-15RE03, https://www.dpuc.state.ct.us/dockcurr.nsf/8e6fc37a54110e3e852576190052b64d/cb3eebc0959ec6ae85258cb2006e72de/$FILE/RE03%20Advocates%20Brief.pdf

Acadia Center offers the following strategies in response to KSQ 10:

1. **Avoid locking in new fossil fuel infrastructure.** New natural gas infrastructure carries decades of costs and will be slow to build out. The CES should propose strategies to evaluate the future of Connecticut's sprawling natural gas system and test any new gas infrastructure proposals against alternatives on total cost, fuel price risk, and stranded asset risk. See Acadia Center's response to KSQ 7 for more detail.

2. **Track and report progress on statutory emissions targets and climate goals on a regular basis.** While DEEP does produce Greenhouse Gas Emissions Inventories, recent reports have become sporadic and the state appears to be behind schedule in releasing the latest inventory. In addition to regular accounting. the CES should set interim, sector-level milestones towards achieving GWSA targets and the 2040 zero-carbon electricity requirement with annual public reporting.

3. **Take an evidence-based approach to emerging technologies.** While the key issues and topics under KSQ 10 include advanced nuclear, long-duration storage, geothermal, and other emerging technologies, these measures should be judged on realistic cost and timeline evidence against resources that can be deployed now. Prospective future resources should not delay near-term deployment of existing, proven resources.

Key Strategic Question #11: How can Connecticut ensure that system, customer, and non-energy benefits are measured and applied consistently?

Inconsistent benefit accounting is one reason clean resources are often judged on gross cost while their savings go uncounted. The CES should include recommendations to develop consistent approaches to benefit accounting.

Acadia Center offers the following strategies in response to KSQ 11:

1. **Make benefits visible to customers.** In addition to accurately quantifying benefits, increasing awareness of the benefits of Connecticut's energy policies and programs among residents and businesses is also essential. The CES should include strategies to communicate these benefits in a way that is easy to understand (for example, see response to KSQ 2).

2. **Evaluate clean energy and energy efficiency programs using all relevant benefits.** A cost-benefit test can only judge a program fairly if it counts what the program delivers. The Connecticut Efficiency Test, which DEEP adopted for the 2022–2024 Conservation and Load Management Plan, was a step forward.[48] It

[48] DEEP, Updated to Conservation and Load Management Cost Effectiveness Testing, April 2022: https://portal.ct.gov/-/media/DEEP/energy/ConserLoadMgmt/Attachment-B---Cost-Effectiveness-Testing-Update.pdf

added avoided oil and propane costs, avoided greenhouse gas emissions, and reduced arrearage costs. It still leaves out most non-energy benefits, such as health, comfort, safety, and property value. DEEP counts those only in a supplemental test for income-eligible programs. The National Standard Practice Manual, which DEEP has used as its guide, calls for counting "all relevant and material impacts, even when difficult to quantify or monetize," and for treating benefits and costs symmetrically.[49] The CES should build on these principles to consistently evaluate energy efficiency and distributed energy resources.

Key Strategic Question #12: How can Connecticut best account for forces that shape the state's energy systems but are outside the state's exclusive or direct control?

Connecticut cannot control regional markets or federal policy, but it has real influence through ISO-NE stakeholder processes, FERC proceedings, and multistate coordination. The CES should identify opportunities for the state to use that influence.

Acadia Center offers the following strategies in response to KSQ 12:

1. **Support independent transmission oversight.** See response to KSQ 6 for more detail.

2. **Reduce exposure to global energy markets.** As U.S. gas prices are increasingly tied to demand through LNG exports, Connecticut can insulate itself from price volatility by decreasing reliance on natural gas through efficiency, electrification, and renewable energy supply. See responses to KSQs 6 and 7 for more detail.

Conclusion

The development of this CES comes at a critical moment for Connecticut as energy costs are a growing concern and the deadlines for meeting emissions targets under the GWSA and Public Act 22-5. The next CES can meet the moment by recognizing that affordability and clean energy goals are not in conflict with each other. However, doing so will require a strong quantitative foundation to characterize Connecticut's energy needs and pathways to decarbonization, a robust process to obtain stakeholder feedback, and clear alignment with statutory target.

Acadia Center appreciates the opportunity to comment and looks forward to future opportunities for engagement in the CES development process.

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[49] National Association of State Energy Professionals, National Standard Practice Manual, 2026: https://www.naseo.org/nesp/nspm

Sincerely,

Kate McAuliffe
Senior Policy Advocate – Connecticut
kmcauliffe@acadiacenter.org
860-246-7121 x202

Ben Butterworth
Director: Climate, Energy & Equity Analysis
bbutterworth@acadiacenter.org
617-742-0054 x111