

Attorneys:

- **Lee D. Hoffman**
lhoffman@pullcom.com
860.424.4315
- **John J. Kindl**
jkindl@pullcom.com
860.541.3307
- **Frederic Lee Klein**
fklein@pullcom.com
860.424.4354
- **Gregory F. Servodidio, CRE**
gservodidio@pullcom.com
860.424.4332

Connecticut DEEP Releases Draft 2020 Integrated Resources Plan

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by Amanda G. Gurren

On December 16, 2020, the Connecticut Department of Energy and Environmental Protection (DEEP) released the long-awaited draft of its 2020 Integrated Resources Plan. The Draft IRP assesses Connecticut's current and future electricity supply with respect to six key objectives that DEEP is seeking to focus on:

1. **Decarbonizing the Electricity Sector:** The Draft IRP provides several pathways for Connecticut to achieve a 100 percent zero carbon electric supply by 2040 (the "100% Zero Carbon Target by 2040"), in accordance with Governor Lamont's Executive Order No. 3. Each proffered pathway highlights certain tradeoffs that Connecticut will need to evaluate in order to achieve that 100 percent zero carbon target for electric supply without comprising the other energy and environmental policies of the State, including the Renewable Portfolio Standards and requirements under the Global Warming Solutions Act.
2. **Securing the Benefits of Competition & Minimizing Ratepayer Risk:** The Draft IRP evaluates the extent to which the state's ratepayers are benefitting from deregulation under the current market paradigm, and looks to measures that may need to be taken in the future, absent market reform to keep costs down.
3. **Ensuring Energy Affordability and Equity for all Ratepayers:** The Draft IRP seeks to maximize residential and business customer value and expand access to participation in Connecticut's energy policy programs by underserved and overburdened communities. For example, the Draft IRP places emphasis on placing rooftop solar systems in environmental justice communities.

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- 4. Optimal Siting of Generation Resources:** The IRP highlights the importance of ensuring that new renewable energy developments harmonize with environmental quality, natural resources, and other land use protections. To that end, the Draft IRP encourages greater stakeholder engagement to (1) develop best siting practices for incorporation in future renewable energy procurements, and (2) make permitting requirements more transparent, predictable and efficient.
- 5. Transmission Upgrades & Integration of Variable and Distributed Energy Resources:** The Draft IRP also seeks to minimize and/or prevent curtailments, and accelerate the deployment of energy efficiency to reduce load, increase storage and active demand response to balance intermittent resources.
- 6. Balancing Decarbonization and Other Public Policy Goals:** The Draft IRP also recognizes that there are other public policy goals that must simultaneously be achieved and addresses how to best accomplish that while focusing on decarbonization of the electricity sector.

To achieve the objectives set forth above, the Draft IRP also delineates several priority actions for Connecticut to take over the next two years, including but not limited to, the following:

- Codify the 100% by 2040 Zero Carbon Target by statute;
- Work with other states in the region to (1) pursue wholesale market reform, (2) improve the transparency and governance of ISO-NE, and (3) upgrade the New England transmission system to increase the potential for additional renewable resources, particularly offshore wind; and,
- Monitor contingencies to determine whether new procurements of grid-scale renewables are needed prior to 2023. The Draft IRP also suggests that the state should explore retaining Renewable Energy Credits (“RECs”) purchased through prior procurements as a more cost-effective way of meeting the 100% Zero Carbon Target by 2040.

The Draft IRP is available for review on the Connecticut DEEP’s website. DEEP is providing sixty days for public comment on the Draft IRP, which will be due on or before February 25, 2021. The agency will also conduct several public meetings to discuss the Draft IRP, including a virtual public hearing on January 14, 2021, with a day and evening session and technical meetings on January 21 and 28. All of these public meetings will be conducted via Zoom.

We will be providing more detailed alerts on various aspects of the Draft IRP in the coming weeks. In the interim, if you would like more information, please contact your responsible Pullman & Comley attorney, or contact one of our energy attorneys.