

**Testimony of**  
**Steve Guveyan, Connecticut Petroleum Council**  
**In Opposition to SB-354, the “Green New Deal”**  
**March 3, 2020**

The Connecticut Petroleum Council/ API is a trade association of major oil companies, oil & natural gas producers, refiners, terminal operators, pipelines and others in the energy business. Our industry is open to policies that achieve cost-effective greenhouse gas (GHG) reductions but are concerned with legislation where there is no sensible balancing of economic, environmental and energy security needs. SB-354, the “Green New Deal” contains a series of unrealistic mandates whose pace, scope and trajectory appears unbalanced and contain no clearly delineated pathway to reach the bill’s targets. In short, it is an aspirational bill, not one that embeds serious public policy, and should be rejected in its current format.

**Objections:**

- A requirement that the transportation sector meet a zero-emission greenhouse gas emission standard [Sec. 1(7)] would be impractical as there are no viable alternatives in the aviation, marine and heavy-duty truck sectors. Planes couldn’t fly in and out of Bradley Airport, ships wouldn’t unload in New Haven, Bridgeport or New London, and trucks running up and down Rte. 84, 91 & 95 to bring goods to Home Depot, Lowe’s or Super Stop & Shop couldn’t operate because there are no batteries available to power 18-wheelers. Numerous other vehicles (fire trucks, snowplows, earth-moving equipment) likely would have no recourse. Out-of-state drivers from MA, NY and RI may not be able to re-fuel in Connecticut.
- The proposed zero-emission standard in the building sector [Sec. 1(7)] is also impractical: it means no building (residential, commercial or industrial) could heat using natural gas, heating oil or propane, leaving potentially costly electricity as the only meaningful option. It’s not practical to think that skyscrapers or hotels in Hartford and Stamford will convert from natural gas or oil to heat pumps that can’t do the job. Nor do those buildings have enough roof capacity to generate electricity using solar panels.
- Connecticut already has a demanding greenhouse gas law on the books (P.A.08-98, amended by HB-5600 in 2008, and then again in 2018 by PA 18-82 imposing a new requirement for a near-term target of a 45% reduction in GHG’s by 2030.) The original law gave all parties a clear, detailed and far-reaching time frame (2050) so they could better plan. SB-354 “moves the goalposts” by inserting additional GHG reduction rules (27.5% by 2025, 54% by 2035, 62.5% by 2040, and 71% by 2045) and stretching the 80% reduction by 2050 to 100% in the transportation and building sectors and 100% by 2050 in the manufacturing sector.

2040 in the power sector without providing (1) a clear pathway for reaching the bill's mandates, and (2) cost transparency: no cost-benefit analysis is required so policy makers and the public know the costs of the bill. Government GHG reduction policies work better when they are market-based (e.g. substituting low-cost natural gas for coal in the power sector) rather than by unyielding, impractical, constantly changing mandates. The cost of fuel and energy security---not just environmental benefits---needs be considered in any serious policy discussion.

- Language in the bill [Sec 1(b), Sec. 2(b)] stating that failure to achieve the above-stated GHG reductions shall constitute “unreasonable pollution” allows the Attorney-General to sue any party, including the state, for declaratory or equitable relief, which does not seem to have been fully thought through.
- As drafted, SB-354 requires numerous sector-specific regulations in an exceedingly short 2-year timeframe [Sec. 1(f)], which is contradicted by Sec. 2(c) which allows for 4 years.
- Additionally, this bill clearly attempts to supersede the authority of the Governor’s Council on Climate Change (GC3), which has been resurrected and is moving forward with a Climate Mitigation Sub-Committee and a Climate Adaptation Sub-Committee. GC3 is presenting its final recommendations to Governor Lamont in January 2021, so this bill front-runs the work being performed by his committee and sub-committees.
- The legislation impedes the power of the Connecticut General Assembly [Sec. 3(c)] by requiring future legislation with a possible impact on climate to have a climate impact note attached, unless the note is dispensed with by a two-thirds vote in whichever branch takes up the bill.
- Finally, the bill gives DEEP extraordinary authority over the state’s economy without any meaningful checks and balances. At a minimum, the Department of Economic & Community Development (DECD) should be heavily involved---especially regarding modelling and major policy decisions---to determine the impact of any regulations on the state economic growth---a top priority of Governor Ned Lamont.

Thank you for taking our serious concerns---especially as they pertain to costs and achievability-- into consideration as you debate the bill. Please do not hesitate to contact us if you have questions or comments.