



ALLCO RENEWABLE ENERGY LIMITED

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Jeffrey R. Gaudiosi
Executive Secretary
Public Utilities Regulatory Authority
10 Franklin Square New Britain, CT 06051

Vicki Hackett
Deputy Commissioner
Department of Energy and Environmental Protection
79 Elm Street
Hartford CT 06106-5127

RE: SCEF Preferences For Year 3, Docket 19-07-01

Dear Attorney Gaudiosi and Attorney Hackett,

Allco Renewable Energy Limited (“Allco”) appreciates the opportunity to provide comments on preferences for the Year 3 Shared Clean Energy Facility (“SCEF”) program, a program intended to help decarbonize the electricity sector in Connecticut.

Whatever preferences are eventually decided upon, none should apply to natural gas fuel cells. Allco’s position is based upon the over-arching requirement for the tariffs—they must be “consistent with and contribute[] to the requirements to reduce greenhouse gas emissions in accordance with section 22a-200a,” *see*, sec. 16-244z(a)(1)(A) (emphasis added) as well as the mandated characteristic of the SCEF program contained in sec. 16-244z(a)(6)(A) that the projects must be cost-effective. Giving a preference to dirty fossil-fuel fuel cells is inconsistent with the statute and makes no sense from a policy perspective.

Natural gas fuel cells do not contribute to the requirements to reduce greenhouse gas emissions in accordance with section 22a-200a. Natural gas fuel cells do the exact opposite—they displace true renewable energy projects, such as solar. The Sierra Club has called State

support of *natural gas* fuel cells “irresponsible,” and a “perverse practice of providing handouts to polluting fossil-fuel dependent technologies.”¹

Natural gas fuel cells are not “green” nor are they “clean.” Sure, they are “cleaner” than a coal-fired power plant (but not by much when fracking is accounted for), and they produce lower levels of certain toxic emissions than a mega-size natural-gas power plant, but they cannot be called “clean” or “green.” Moreover, natural gas fuel cells contribute to the demand for natural gas, which in turn contributes to fracking and the release of methane into the atmosphere, which is more than 80 times worse than regular CO2 emissions.

Natural gas fuel cells are not cost-effective. They perpetuate the cycle of climate destruction. Natural gas fuels cells also raise energy and health care costs for CT ratepayers and residents. There are also extra hidden costs from natural gas fuel cells from the EDCs building out more natural gas infrastructure and rate-basing it as additional costs to ratepayers. And last, but certainly not least, are the adverse health and climate costs that would be caused by these fossil fuel generators. Natural gas fuel cells also produce hazardous materials, such as benzene, lead, arsenic, chromium and other emissions that the residents and school-age children in the area of the fuel cell would be exposed to.

Making matters even worse, these natural gas fuel cells frequently end up being proposed in environmental justice communities that already have some of the highest rates of emergency room visits for asthma in CT, and these natural gas fuel cells will further aggravate a bad situation for those residents. The natural gas fuel cell proposed in Bridgeport (CSC docket 1406A) is paradigm of what not to do—more natural gas pollution in environmental justice communities that are already “red” zones for the highest rates of asthma hospitalizations in CT.

To the astonishment of those that believe in science, dirty natural gas fuel cells have carved out an opportunity to pretend that they are clean, renewable energy. But natural gas fuel cells should not be able to continue to get a free ride off ratepayers for the environmental destruction they inflict. They certainly should not get a financial preference for doing so.

Please contact me with any questions.

Respectfully,

/s/Thomas Melone

Thomas Melone

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¹ See, “*Sierra Club slams California commission for making gas-fired choices*,” <https://www.transmissionhub.com/articles/2015/11/sierra-club-slams-california-commission-for-making-gas-fired-choices.html>.