

## COMMENTS ON MODIFYING THE REGIONAL GREENHOUSE GAS INITIATIVE (RGGI) FROM DELAWARE POWER AND LIGHT (DeIPL)

As it was first designed, RGGI was to try to keep total CO2 emissions from power plants of over 25 MW capacity within the participating states to the average total emissions during the baseline years of 2002-2004, until 2015, and then reduce them by 10% between 2015 and 2020.<sup>1</sup> The U.S. recession and the conversion of many power plants from coal to natural gas has already reduced emissions substantially - years before 2015. In the case of New York, the largest emitter in the region, emissions fell by 45% between 2009 and 2013.<sup>2</sup> Substantial emission reductions over the same period have also been seen in Delaware. A cap based on 2002-2004 emissions provides no incentive for further emission reductions and no longer makes sense. The cap should be set based on much more recent data, for example emissions during the years 2010-2012.

The damage caused by Hurricane Sandy should also be a wakeup call for increasing the rate at which the RGGI cap is reduced. A more rapid reduction may increase the price of electricity, but the costs to society that economists call “externalities” caused by storm damage and increased health care costs with a slow reduction are likely to dwarf the increased costs of electricity with an ambitious one. A reasonable approach might be the one suggested by Environment America in its recent press release: “Adjust the RGGI cap to ensure that it reduces emissions 20% below current levels by 2020 and is on track to reduce emissions by at least 80% by 2050.”<sup>3</sup>

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<sup>1</sup> Wikipedia, Regional Greenhouse Gas Initiative, at: [http://en.wikipedia.org/wiki/Regional\\_Greenhouse\\_Gas\\_Initiative](http://en.wikipedia.org/wiki/Regional_Greenhouse_Gas_Initiative)

<sup>2</sup> Dale Bryk’s Blog, posted by the Natural Resources Defense Council Switchboard on Jan. 10, 2013, in an article titled, **Cuomo sets national model for power plant pollution reduction by committing to strengthen RGGI**. At: [http://switchboard.nrdc.org/blogs/dbryk/cuomo\\_sets\\_national\\_model\\_for.html](http://switchboard.nrdc.org/blogs/dbryk/cuomo_sets_national_model_for.html)

<sup>3</sup> Environment America News Release of Dec. 10, 2012, **Northeast Governors Urged to Strengthen Cap on Global Warming Emissions from Power Plants - Stronger Program will Accelerate Progress on Clean Energy**. At: <http://www.environmentamerica.org/news/ame/northeast-governors-urged-strengthen-cap-global-warming-emissions-power-plants>



## MASSACHUSETTS INTERFAITH POWER & LIGHT

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January 17, 2013

The Hon. Deval Patrick  
Massachusetts State House  
Office of the Governor  
Room 280  
Boston, MA 02133

Dear Governor Patrick,

Massachusetts Interfaith Power & Light and our 202 faith community members have been providing a religious response to climate change for ten years. We applaud the leadership you have demonstrated by passing and aggressively implementing The Massachusetts Global Warming Solutions Act and the Green Communities Act of 2008.

Perhaps the most important thing we can do to address climate change as a nation is to put a price on carbon. The Regional Greenhouse Gas Inventory is a mechanism that can be a model for the nation, but its cap needs to be adjusted. **We support resetting the regional cap at 85 million metric tons.** Such action will achieve a region-wide 20 percent reduction in emissions by 2020, a meaningful step toward achieving the critically important long term goal of an 80 percent reduction

Much of the money generated by RGGI is used directly for energy efficiency programs. A [report from the Analysis Group](#) found the program has so far added \$498 million in net value to Massachusetts' economy, while creating about 3,791 new jobs.

Climate change is causing unconscionable suffering to those who can least adapt to it. Notable examples during the past few years include worsening the damage caused by Superstorm Sandy, crippling droughts in the Midwest and unprecedented flooding in many parts of the country including in Massachusetts.

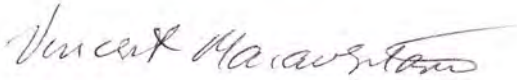
Resetting the RGGI cap at 85 MMT is necessary to protect creation and is good for the economy. **It is also the right thing to do.**

Hon. Deval Patrick  
January 17, 2013  
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If you have any questions please contact me either at [vince@MIPandL.org](mailto:vince@MIPandL.org) or by telephone at 617-244-0755.

Many thanks for your anticipated attention to this important matter.

Yours truly,

A handwritten signature in black ink, appearing to read "Vincent Maraventano", written in a cursive style.

Vincent Maraventano  
Executive Director  
617-244-0755

cc: MAIPL Executive Committee  
Ken Kimmell, Secretary, RGGI Bd. of Directors  
Mark Sylvia, RGGI, Inc. Bd. of Directors  
Nicole Singh, Executive Director, RGGI, Inc.

**From:** [Jost-Coq Noel](#)  
**To:** [Information](#)  
**Subject:** RGGI comment  
**Date:** Wednesday, January 16, 2013 6:11:31 PM

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To Whom It May Concern,

On behalf of the Board of Directors of New Hampshire Interfaith Power & Light, I would like to urge you to take strong and decisive action on climate change by adjusting the cap allowed in the Regional Greenhouse Gas Initiative to ensure that it reduces carbon emissions by 20% by 2020 and by 80% in 2050. I also urge you to invest the revenues generated by RGGI to energy efficiency and renewable energy programs that will save energy, create jobs, lower costs, and reduce pollution. Finally, I urge you to prevent loopholes that will allow polluters to avoid participating in the program, thus undermining its effectiveness.

New Hampshire Interfaith Power and Light represents the faith community. It is a community that is deeply concerned about climate change and extremely motivated to address this issue with the strongest possible action. For people of faith, climate change is a moral, ethical, and spiritual issue to which we absolutely must respond. God's planet is being destroyed through our selfish misuse of the resources He has given us. We must address the climate crisis on every level, from government regulation to personal choices.

Strong standards in RGGI will do more than reduce carbon pollution, however. It will help create much-needed jobs and continue to build a green, sustainable economy. Thus far, RGGI has generated \$60M in revenue for the state, most of which has gone to fund efforts in energy efficiency and renewable energy. This has created new jobs and helped people save energy and money, at a time when many desperately need to do both. Stronger standards would generate more income, which we could invest in ensuring that New Hampshire and New England continue to lead the nation in green job growth.

We need strong leadership from our Governors. We need your integrity, your intelligence, and your Yankee determination. We need you to close the loopholes and lower the cap. We need you to invest in a green economy. But most of all, we need you to take a strong stand against climate change. If you do, we will be standing there with you, shoulder to shoulder.

Please take a stand on this moral imperative, and help protect God's planet for future generations.

Best regards,

Noel Jost-Coq

for the Board of Directors

New Hampshire Interfaith Power and Light



**From:** [Janna Stieg Watkins](#)  
**To:** [Information](#)  
**Subject:** RGGI Comment  
**Date:** Thursday, January 17, 2013 3:00:49 PM

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Dear Governor Cuomo and RGGI Representatives,

We are writing to encourage you to continue to support the Regional Greenhouse Gas Initiative (RGGI) and to ask you to strengthen the measure.

As the leadership of New York Interfaith Power & Light, we represent the entire breadth of New York State's faith communities. It is a collaborative community of all faith traditions that is deeply concerned about climate change and extremely motivated to address this issue with the strongest possible action. For people of faith, climate change is a moral, ethical, and spiritual issue to which we absolutely must respond. We must address the climate crisis on every level, from government regulation to personal choices.

RGGI is a key strategy for reducing carbon emissions, and showcases the northeast as a leader in this effort. Not only does RGGI help New York meet our environmental goals, RGGI-funded investments are also benefiting our economy.

The initial RGGI CO<sub>2</sub> cap was set by making assumptions that have since been proven inaccurate. NYSERDA (New York State Energy Research & Development Authority) states that in 2009 region-wide emissions from covered facilities were about 122 million tons, which is more than 60 million tons below the cap. If nothing is done to correct this problem, RGGI may become ineffective in the future.

We urge you to adjust the cap to ensure it reduces emissions by 20% below current levels by 2020 and is on track to reduce emissions by at least 80% by 2050. We also ask that you ensure that the revenues from the program are invested in energy efficiency and renewable energy options, and we encourage you to prevent loopholes that will undermine the effectiveness of the program.

Thank you for your attention to this most urgent matter.

For the Board of Directors of New York Interfaith Power & Light,

Janna Stieg Watkins  
Director  
New York Interfaith Power & Light  
8328 Preserve Parkway  
Manlius, NY 13104  
(315) 256-0078  
[www.nyipl.org](http://www.nyipl.org)

**From:** [Liz Marsis](#)  
**To:** [Information](#)  
**Cc:** [Nicole Singh](#)  
**Subject:** Support resetting the regional cap to 85 million tons  
**Date:** Wednesday, January 16, 2013 4:46:10 PM

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January 16, 2013

Regional Greenhouse Gas Initiative, Inc.  
90 Church Street, 4th Floor  
New York, NY 10007

RE: Comments on proposals for change in the Regional Greenhouse Gas Initiative (RGGI)

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Dear Director Singh,

[RI Interfaith Power & Light](#) appreciated the work of the RGGI, Inc. When adjusting the regional emissions cap, we urge you to ensure that significant reductions in climate change emissions will be the net result from electric production in our nine state regions. RI Interfaith power and Light recommends that the regional emission cap aligns the RGGI program with critically important long term goals.

To put the Northeast on track to meet targets widely embraced by the international scientific community, RGGI must ensure the lowering greenhouse gas emissions by 80 percent below current levels by 2050.

**Specifically, we ask you to set the regional cap at 85 million tons, which will achieve a region wide 20 percent reduction in emissions by 2020, a meaningful step toward the long term goal.**

While the RGGI program has produced significant revenues that are being applied in Rhode Island to improve energy efficiency, it is not enough to achieve the region wide 80% reduction by 2050 target required to address the climate change problem effectively.

Rhode Island Interfaith Power and Light ([www.ri-ipl.org](http://www.ri-ipl.org)) is one of 40 independent state affiliates of Interfaith Power and Light. From a moral perspective, we engage our diverse faith communities and individual members of our communities to address the crisis of global warming, with justice, through advocacy, education and GHG reductions.

If you have any questions on these comments, please contact me at 401-261-3426 or by email at [liz@ri-ipl.org](mailto:liz@ri-ipl.org).

Sincerely,



Liz Marsis

Director – Consultant to the Board of Directors, Rhode Island Interfaith Power and Light

Liz Marsis

Director

RI Interfaith Power & Light

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## Vermont Interfaith Power and Light

P.O. Box 209  
Richmond, VT 05477  
[info@vtipl.org](mailto:info@vtipl.org) 802-434-3397 [www.vtipl.org](http://www.vtipl.org)

January 16, 2013

Governor Peter Shumlin  
State of Vermont  
109 State Street, Pavilion  
Montpelier, VT 05609

VIA FAX

Re: Comments on proposals for updating and improving the Regional Greenhouse Gas Initiative (RGGI)

Dear Governor Shumlin:

Vermont Interfaith Power and Light urges you to play a leadership role in supporting significant improvements in the Regional Greenhouse Gas Initiative (RGGI). The RGGI program is considering changes in the rules that will govern the administration of this important program over the next several years. We believe that the proposed adjustments to the RGGI cap are inadequate; they will not produce significant reductions in climate change emissions resulting from electric production in this nine state region. We recommend that you advocate for a regional emission cap that will align the RGGI program with critically important long term goals.

Vermont Interfaith Power and Light ([www.vtipl.org](http://www.vtipl.org)) engages diverse Vermont communities of faith and individuals to address the crisis of global warming. We advocate for clean renewable energy and clean air policies needed to address this crisis..

Vermont is on a path to meet our electricity needs with low carbon, renewable energy sources. The RGGI program should provide the guidelines and incentives required to move the entire Northeast Region to reduce significantly the carbon emissions associated with electricity production.

Vermont is linked through the New England Power Pool to the electric systems of other states in the region. When an office building in Vermont turns on an air-conditioner, the change in load may very well be met by a natural gas fueled plant in another New England state. While it is important that Vermont utilities acquire low carbon electricity supplies, doing so is not sufficient to address the problem. We must also encourage utilities throughout New England to reduce carbon emissions from the electricity supplies they acquire. The RGGI program is designed to address this interdependence.

We recommend that Vermont advocate for a RGGI emissions cap that will ensure that region wide emissions reductions will put the Northeast on track to lower greenhouse gas emissions by 80 percent below current levels by 2050, a target widely embraced by the international scientific community. **We support resetting the regional cap at 85 million tons, which will achieve a region wide 20 percent reduction in emissions by 2020, a meaningful step toward the long term goal.**

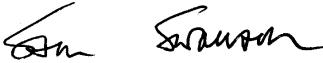
The RGGI program has produced significant revenues that are being applied in Vermont to improve energy efficiency. We applaud these benefits, but frankly actions supported by RGGI revenue will not put us on track

to achieve the region wide 80 by 50 target required to address the climate change problem effectively.

You have spoken boldly about the need to address climate change and you have observed that while Vermont can lead, it cannot tackle the problem alone. The RGGI program offers the opportunity to leverage Vermont's leadership. We urge you to seize this opportunity not only for the benefit of all Vermonters, but also for all of humanity and all living creatures on this precious planet.

If you have any questions on these comments, please contact me at 802 652 0056 or by email at [samswanson@aol.com](mailto:samswanson@aol.com)

Sincerely,

A handwritten signature in black ink, appearing to read "Sam Swanson".

Sam Swanson  
President  
Vermont Interfaith Power and Light Board of Directors.

cc: Vermont Representatives on the RGGI Board of Directors  
James Voltz, Chair, Vermont Public Service Board  
Justin Johnson, Deputy Secretary, Vermont Agency of Natural Resources  
Nicole Singh, Executive Director, RGGI, Inc.