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**To:** <RGGICOMM@gw.dec.state.ny.us>  
**Date:** 5/19/06 2:52PM  
**Subject:** comments on the RGGI Model Rule

TO: NYS Working Group - Regional Greenhouse Gas Initiative  
May 19, 2006  
RE: Strengthen the Model Rule to Address Climate Change/Global Warming

Dear Mr. Litz and Members of the NYS Working Group:

The States participating in the Regional Greenhouse Gas Initiative (RGGI) have shown great leadership in seeking to reduce climate-altering pollution. It is important that the RGGI results in real reductions in emissions of carbon dioxide from power plants. Human health and well-being (especially of the poor and vulnerable) as well as the economic vitality and sustainability of the natural systems of New York State depends on this.

Last year, Governor Pataki and the governors of New Jersey, Delaware, Connecticut, Maine, New Hampshire and Vermont signed a Memorandum of Understanding that includes modest reductions in emissions. These reductions are achievable from both a practical and political perspective. Recently, New York State released for comment a Model Rule for RGGI. This Rule is not strong enough. It is essential that the Model Rule not undermine the concepts agreed upon in the Memorandum of Understanding. We urge you to address the following issues to ensure real reductions in climate-altering pollution:

· **Protect the integrity of the proposed Emissions Cap**  
The proposed Model Rule could result in emissions that are higher than the anticipated business as usual levels and may not require reduced emissions for many years. The potential increase in emissions is the result of exemptions for large industrial power generators - the exemptions effectively raise the modest pollution cap in the early years. We urge you to remove these exemptions in the final Model Rule. Time is of the essence in addressing climate-altering pollution.

· **Carbon Dioxide Offsets**  
New Yorkers expect that any offset of carbon dioxide emissions (such as reforestation or purchase of carbon reductions elsewhere) would be real, surplus, verifiable, permanent and enforceable. While the Memorandum of Understanding signed by the governors specifically included these criteria, the proposed Model Rule does not. These criteria must be clearly spelled out in the final Model Rule for the public to have confidence that offsets used in the RGGI will result in real reduced carbon dioxide emissions.

· **Carbon Dioxide Allowances**  
The Memorandum of Understanding requires that at least 25% of carbon

dioxide allowances be allocated for consumers and that the sale of these allowances be used to support projects that benefit the public and reduce emissions. We urge that New York and the other RGGI participating states allocate 100% of the carbon dioxide allowances to the public.

Catholic social teaching reminds us that, "Inaction or inadequate or misguided responses to climate change will likely place even greater burdens on already desperately poor people. Action to mitigate climate change must be built upon a foundation of social and economic justice. It is about protecting both the human person and the natural environment." (Global Climate Change: A Plea for Dialogue, Prudence and the Common Good - U.S. Catholic Bishops) Thank you for your leadership in effectively addressing the climate-altering pollution that harms New York and contributes to global climate disruption.

Respectfully,

Kathleen M. Dubel  
for the Public Policy Committee of the Roman Catholic Diocese of Rochester,  
New York