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To: <rggicomm@gw.dec.state.ny.us>
Date: 4/25/06 1:27PM
Subject: Comments on the Draft RGGI Model Rule

To: RGGI Environmental & Energy Commissioners and Staff Working Group

The Regional Greenhouse Gas Initiative is precedent setting and very important in the fight against global warming - even if the 10% reduction goal is modest. This initiative is an opportunity to demonstrate that real global warming reductions can be done in a way that is not only cost-effective, but may stimulate the local economy through technological innovation.

I am concerned that certain provisions in the draft model rule will erode the efficacy of achieving real global warming pollution reductions from the power sector.

The pollution cap should apply to all facilities that burn fossil-fuels to generate at least 25 MW of electricity, even if they are a large industrial generator or use a certain percentage of biomass. Each exemption means more global warming pollution and sets the wrong example for the rest of the nation.

The rule's requirements for pollution credits given outside the power generating sector (offsets) should be consistent with the Memorandum of Understanding, which requires an offset to be at least "real, surplus, verifiable, permanent and enforceable". Such standards for alternate pollution allowances are needed to ensure credit is not given to projects that could later lead to global warming pollution being released or that do not definitively reduce pollution at all. No allowances should go to generators. All allowances should go to consumers for rebates and electricity demand control measures. The RGGI standard that applied to power plants within the region should be applied to all imported electricity. This will ensure that this initiative does not inadvertently increase pollution elsewhere. I thank you for your efforts to date on this potentially groundbreaking initiative and urge you to make the changes to reinforce this program rather than loosen it.

Sincerely,

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