

THE FOLLOWING E-MAIL WAS SUBMITTED BY 283 INDIVIDUALS

From: <[REDACTED]>
To: <rggicommm@gw.dec.state.ny.us>
Date: 5/18/06 11:53PM
Subject: Strengthen and Finalize RGGI

RGGI Staff Working Group

Dear RGGI Staff Working Group,

As an outdoors enthusiast, climate change will directly affect me and the natural areas I care about through continued increasing temperatures, reduced annual snowfall, and earlier lake ice-out dates in the New England region.

The Regional Greenhouse Gas Initiative will aid in this nation's fight against climate change. If properly designed, RGGI will reduce electric sector emissions while demonstrating to the rest of the country that it is possible to reduce emissions in a cost-effective manner while promoting technological innovation that stimulates the local economy.

I urge you not to allow inflation or delay of this very modest carbon dioxide cap target through exemptions, specifically:

- * Do not exempt large industrial power generators included when the cap levels were set or reduce the cap by an amount equivalent to the exempted units' annual emissions.
- * Do not exempt emissions from fossil fuels where biomass input exceeds 50%, instead calculate emissions based on the proportion of fossil fuel input to any dual-fueled plant, except for de minimus use of fossil fuels.
- * Do not allow early reduction credits to create additional allowances.

I urge you to include language that requires that alternative carbon emission reduction projects (offsets) are only eligible if deemed to be real, surplus, verifiable, permanent, and enforceable. These criteria must be clearly spelled out in the model rule for the public to have confidence that any offsets used in the RGGI program are equal to power plant emissions reductions.

The rule should clarify that the consumers benefit account is a minimum which each state is free to raise, and that the percentage allocated to consumers should increase over time. The consumer account should be used to (1) reduce the costs of the RGGI program to the state's electricity ratepayers; (2) provide additional benefits for activities or projects that would not have occurred anyway and not replace existing programs or investments; and (3) support programs and activities that do not pose a significant risk to human health and the environment.

I urge you to strengthen and finalize the model RGGI rule.

Sincerely,

Brian Geary
[REDACTED]

New Haven, Connecticut 06512