

# ENVIRONMENTAL ENERGY ALLIANCE OF NEW YORK

677 Broadway, Suite 1205  
Albany, NY 12207-2996

January 22, 2013

Submitted Via E-Mail to [info@rggi.org](mailto:info@rggi.org)

## Re: RGGI Ratepayer Impact Analysis

I am pleased to write on behalf of the Environmental Energy Alliance of New York, LLC (the Alliance; see list of generating company members highlighted below on this page) to provide this comment on the ratepayer impact analysis. Alliance members own and operate electric generating and transmission and distribution facilities located throughout New York State and, in some instances, across the nation and the globe. The operations of Alliance members contribute to the reliability of the State's electric grid and to the economic well-being of New York State. Our member companies are deeply concerned about the potential ratepayer impacts of the lower proposed emission caps.

The IPM Potential Scenario Customer Bill Analysis revised on January 14, 2012 that provides regional bill impacts and a similar analysis available that provides New York ratepayer bill impacts both have the same error in their summaries of the average ratepayer impact. The average impacts for all three ratepayer classes average all the years provided by the IPM scenarios. It is inappropriate to use 2012 and 2013 results because the alternate scenarios are not in place. Using data from those years underestimates the average impact of the scenarios.

In general, there also is a concern that the average value may not characterize ratepayer impacts adequately. The average combines the increase in cost with offsetting reductions in energy efficiency and direct bill assistance. While all ratepayers will see an increase in costs, not all the ratepayers will derive benefits from energy efficiency if they have already invested in energy efficiency projects and direct bill assistance if they do not qualify. Without some information on the distribution of the offset benefits of RGGI investments across the ratepayer classes it is unclear whether the average is an appropriate metric.

Sincerely,



Roger Caiazza  
Director

*Central Hudson Gas & Electric Corporation  
Consolidated Edison Company of New York, Inc.\*  
Dynergy NE Generation, Inc.\*  
Long Island Power Authority  
GenOnInc\*  
National Grid\*  
Selkirk Cogen\**

*New York State Electric & Gas Corporation  
New York Power Authority\*  
NRG Energy, Inc.\*  
Orange & Rockland Utilities, Inc.  
Rochester Gas & Electric Corporation  
TransCanada\*  
US Power Generating Co.\**