

**THE FOLLOWING E-MAIL WAS SUBMITTED BY 141 INDIVIDUALS**

**From:** <[REDACTED]>  
**To:** <rggicommm@gw.dec.state.ny.us>  
**Date:** 5/18/06 9:52AM  
**Subject:** Strengthen the Model Rule. Do Something Real to Address Global Warming

Members of the Regional Greenhouse Gas Initiative's NY State Working Group

Dear Members of the Initiative's NY State Working Group,

States participating in the Regional Greenhouse Gas Initiative (RGGI) have shown leadership in putting forward a program that will reduce climate-altering pollution. We need to make sure that the RGGI will result in REAL reductions in emissions of carbon dioxide from power plants.

Last year, the governors of New York, New Jersey, Delaware, Connecticut, Maine, New Hampshire, and Vermont signed a Memorandum of Understanding (MOU) that includes modest reductions in emissions. The reductions are achievable from both a practical and political perspective. More recently, New York State released a Model Rule for comment. It's not strong enough.

We need to do more. It is essential that the Model Rule not undermine the concepts agreed to in the MOU. As a concerned New York resident, I urge you to address the following issues to ensure real reductions of climate altering pollution.

**1. 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 would not require reduced emissions for many years. This is not acceptable.

The potential increase in emissions is the result of exemptions for large industrial power generators and others. These exemptions effectively raise the modest pollution cap in the early years. We urge you to remove these exemptions in the final Model Rule.

**2. Carbon Dioxide Offsets**

The public has been repeatedly assured 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 MOU signed by the governors specifically included these criteria, the Model Rule released in March did not. These criteria must be clearly spelled out in the Model Rule for the public to have confidence that offsets used in the RGGI program will result in reduced carbon dioxide emissions.

**3. Carbon Dioxide Allowances**

The MOU required that at least 25 percent of carbon dioxide

allowances be allocated for consumers, and that the sale of these allowances be used to support projects that would benefit the public and reduce emissions.

We urge New York and the other participating states to allocate 100 percent of the allowances in this way. This is a direction favored by Attorney General Elliot Spitzer in his testimony to the Regional Stakeholder's group on May 2nd, and a direction that ensures the maximum public benefit at the minimum public cost.

We again thank the Staff Working Group for taking the time to solicit comments on the proposed Model Rule.

Sincerely,

Shawn McConnell

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