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Nicole Singh  
Acting Executive Director  
Regional Greenhouse Gas Initiative, Inc.  
4<sup>th</sup> Floor, 90 Church Street  
New York, NY 10007

RE: [info@rggi.org](mailto:info@rggi.org)  
Comments on the Integrated Planning Model Results

Dear Ms. Singh:

Enclosed are comments by Capital Power Corporation (“CPC”) regarding the Integrated Planning Model (“IPM”) used to evaluate the different Greenhouse Gas caps.

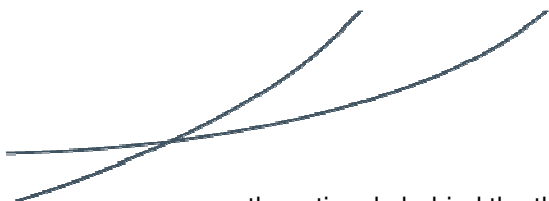
#### Background

CPC owns and operates three natural gas electricity generating facilities in the Regional Greenhouse Gas Initiative (“RGGI”) Region: (a) the “Rumford Facility” located at Rumford, Maine, which has a nominal capacity of 265 MW, (b) the “Tiverton Facility” located at Tiverton, Rhode Island, which has a nominal capacity of 265 MW, and (c) the “Bridgeport Energy Facility” located at Bridgeport, Connecticut which has a nominal capacity of 520 MW.

#### Comments

CPC understands that the IPM model is carried out for scenario analyses to provide information for the overall program review process. The scenario specifications do not reflect a preference for or selection of any specific policy. CPC is an independent power producer where regulatory certainty plays a pivotal role in our investment decisions. Policies to improve environmental outcomes must provide the regulatory certainty and predictability that will enable industry to make effective investment decisions and operate new and existing facilities efficiently and economically going forward. Therefore, it is important to continue the open and transparent RGGI review process.

The modelling assumption has not been released for review. Without the modelling assumptions CPC cannot provide comprehensive comments. The following are examples of areas where additional information is needed:

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- the rationale behind the three scenario caps,
  - details on the development of the cost containment reserve price collars,
  - unit retirement assumptions used in IPM modelling; and
  - the integration of the Mercury and Air Toxics Standards (MATS) in IPM modelling.

CPC recommends that RGGI Inc. releases the detailed IPM modelling assumptions and inputs for stakeholder review before initiating the REMI macroeconomic modelling.

CPC appreciates the opportunity to comment. If you have any questions, please contact me at (780) 392-5172.

Yours truly,



Ahmed Idriss, Ph.D., P.Eng.  
Senior Manager, Climate Change & Air Policy  
Capital Power Corporation