



Office of the People's Counsel District of Columbia

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Elizabeth A. Noël
People's Counsel

April 13, 2005

Regional Greenhouse Gas Initiative
State Working Group

Dear State Working Group Members,

The Office of the People's Counsel of the District of Columbia ("OPC") is aware of efforts by the Regional Greenhouse Gas Initiative ("RGGI") State Working Group to institute a "cap-and-trade" program to address the emissions of greenhouse gases in its respective states. The District of Columbia is merely an observer state of RGGI. However as the impact of any "cap-and-trade" program adopted will be felt throughout the entire PJM footprint, OPC is concerned that structural features of any "cap-and-trade" program not adversely affect the utility consumers of the District of Columbia.

Utility consumers in the District of Columbia already face increased electric and natural gas costs. Any program that would increase the wholesale rates and thus increase retail rates is vigorously opposed by OPC. OPC respectfully urges RGGI to consider the financial implications of any "cap-and-trade" program it may adopt on not just their respective states but the entire wholesale utility market. The implication of any "cap-and-trade" program will have consequences beyond the borders of the nine RGGI states.

Sincerely,

Elizabeth A. Noël, Esq.
People's Counsel