

January 21, 2016

VIA EMAIL

Environmental Protection Agency
EPA Docket Center (EPA/DC), Mail code 28221T
Attn: Docket ID No. EPA-HQ-OAR-2015-0199
1200 Pennsylvania Ave. NW
Washington, DC 20460
A-and-R-Docket@epa.gov

Re: Docket ID No. EPA-HQ-OAR-2015-0199 – *RGGI States' Comments on Proposed Federal Plan and Model Trading Rules for the Clean Power Plan*

The nine states participating in the Regional Greenhouse Gas Initiative (“RGGI”)¹ are pleased to submit these joint comments on the proposed Federal Plan (“FP”) and Model Rules (“MR”).² The RGGI states welcome the EPA's recognition in the final Clean Power Plan (“CPP”) that well-designed multi-state, market-based programs like RGGI can deliver cost-effective emissions reductions. The RGGI states have seen benefits to the economy and public health, as well as consumer savings, experiencing 8 percent GDP growth across the region while reducing power sector carbon pollution by more than 40 percent since 2005. These significant reductions have occurred while maintaining electric reliability.

¹ Connecticut, Delaware, Maine, Maryland, Massachusetts, New Hampshire, New York, Rhode Island, and Vermont (collectively referred to as the “RGGI states”).

² The RGGI states also jointly commented on the draft CPP on November 5, 2014 and submitted supplemental comments on December 2, 2014, available at http://www.rggi.org/docs/PressReleases/PR110714_CPP_Joint_Comments.pdf and http://www.rggi.org/docs/PressReleases/PR120114_RGGI_SupplementalComments_CPP.pdf respectively.

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RGGI is composed of individual CO₂ budget trading programs covering new and existing electric power plants in each RGGI state, which together create a regional market for CO₂ allowances. This enables market forces to determine the most economic means of reducing emissions and creates the market certainty needed to drive long-term investments in clean energy. A hallmark of the RGGI program is that all participating states have retained the flexibility to implement the program and invest proceeds in a manner consistent with each state's priorities, goals, and needs. Each participating state's regulations are independent, and are based on and consistent with the RGGI Model Rule. Each state issues CO₂ allowances in quarterly regional auctions in a pre-defined quantity that serves to cap CO₂ emissions.

The RGGI states distribute approximately 90 percent of CO₂ allowances through regional CO₂ allowance auctions. Reinvestment of proceeds generated by the auctions is a key component of RGGI, and creates individual savings and emissions reductions through strategic programs in each state. Each state maintains complete discretion in the investment of RGGI auction and program proceeds, and all investment programs are independently administered and operated by the states.

Thanks to RGGI and other complementary state programs, the RGGI states are well-placed to meet their targets under the CPP, which are among the most ambitious in the nation. The RGGI states are pleased to have launched the 2016 RGGI Program Review, to seek stakeholder input on RGGI program successes, impacts, and program design changes, as well as potential program changes in pursuit of compliance with the CPP.¹ Already, commenters—including compliance entities—have commended the RGGI program as a proven model.² While the 2016 RGGI Program Review is still underway, the RGGI states believe it is important to comment on the opportunities the EPA has in the FP and MR to encourage implementation approaches that have already proven successful through the RGGI program, and that will facilitate multi-state trading and thus, more cost-effective, reliable CPP compliance over the years to come.

In these comments, the RGGI states make six recommendations to the EPA that would strengthen the MR, FP, and the CPP. 1) The EPA should adopt a mass-based program for the FP; 2) the EPA should encourage auctioning and reinvestment of auction proceeds; 3) The new source complement is the most effective means of preventing leakage from existing sources to new sources, and alternative methods of allocation must be equally effective; 4) the EPA should adopt a trading platform that is flexible and customizable to encourage broader trading markets; 5) the EPA should allocate CEIP allowances more equitably; and 6) the EPA should continue to support state energy efficiency programs.

¹ <http://www.rggi.org/design/2016-program-review>.

² E.g., see November 17, 2015 meeting comments from: Calpine Corporation (http://www.rggi.org/docs/ProgramReview/2016/11-17-15/Comments/Calpine_Comments.pdf); Exelon (http://www.rggi.org/docs/ProgramReview/2016/11-17-15/Comments/Exelon_Comments.pdf); and Emera Energy (http://www.rggi.org/docs/ProgramReview/2016/11-17-15/Comments/Emera_Energy_Comments.pdf) at <http://www.rggi.org/design/2016-program-review/stakeholder-comments-2016>.

I. The EPA Should Adopt A Mass-Based Program For The FP And Encourage States To Adopt A Mass-Based Program In Their Compliance Plans

The centerpiece of the RGGI program is a robust mass-based trading program encompassing nine states, spanning three Regional Transmission Organizations (“RTOs”), and representing 15.7% of the country’s GDP. The RGGI states strongly encourage the EPA to follow the RGGI model and adopt a mass-based FP. Economic analyses clearly show that cooperation between states and larger trading markets will lower the costs of compliance with the CPP, as compliance entities find the most cost-effective carbon reductions.³ In addition, broad interstate cooperation enhances reliability, by limiting the impact of infrastructure constraints, weather events, and other circumstances that could otherwise affect carbon reduction opportunities in smaller markets. The RGGI states believe that the EPA should facilitate the formation of larger markets and greater amounts of trading among the states by focusing states’ compliance options on a single plan type. One way to do this is by adopting a mass-based program for the FP.

A mass-based approach simplifies compliance and enforceability, and avoids accounting complexities associated with rate-based approaches. For example, renewable energy (RE) and energy efficiency (EE) programs act as complementary policies under a mass-based program that need not be separately accounted for or made federally enforceable. A mass-based approach also circumvents interstate issues, such as those regarding which state receives “credit” for various RE and EE measures. A mass-based approach, in the form of a mass-based emissions cap, also ensures that overall CO₂ emissions remain below specified levels.

For states that choose to implement their own rule, the RGGI states support their freedom to choose between a rate-based and mass-based plan based on their individual circumstances. However, the RGGI states believe the EPA should encourage such states to adopt a mass-based program. States already have experience from other federal air programs in developing mass-based trading programs such as the Acid Rain Program, the Cross State Air Pollution Rule, the Clean Air Interstate Rule, and the NO_x SIP Call Trading Program. Accordingly, states already have staff with experience implementing similar programs that they can draw upon in implementing a mass-based trading program for compliance with the CPP. A mass-based plan is also easier for states to administer than a rate-based plan. A rate-based program requires states to establish accounting mechanisms and undertake rigorous and consistent evaluation, measurement, and verification (EM&V) to ensure that the program is working effectively. Such mechanisms are unnecessary in a mass-based program, where compliance is ensured simply by the monitoring of actual emissions at affected sources, and then those sources having enough allowances to cover their CO₂ emissions for the compliance period.

³ MISO GHG Regulation Impact Analysis – Initial Study Results, September 17, 2014 available at <https://www.misoenergy.org/layouts/miso/ecm/redirect.aspx?id=184618>;

SPP Clean Power Plan Compliance Assessment – State-by-State, July 27, 2015, available at

http://www.spp.org/documents/29180/spp_state_by_state_compliance_assessment_report_20150727.pdf; PJM

Interconnection Economic Analysis of the EPA Clean Power Plan Proposal, March 2, 2015 available at

<https://www.pjm.com/~media/documents/reports/20150302-pjm-interconnection-economic-analysis-of-the-epa-clean-power-plan-proposal.ashx>.

II. The EPA Should Encourage Auctioning and Reinvestment of Auction Proceeds

The RGGI states recognize that there are many different ways for allowances to be allocated in a mass-based plan. The RGGI experience shows, however, that auctioning of allowances with reinvestment of proceeds in energy efficiency, renewable energy, and other programs that benefit ratepayers, yields benefits to ratepayers and delivers additional emission reductions beyond the cap. The EPA should explicitly recognize auctions as a presumptively approvable allocation method in the FP and MR and, to the extent that direct allocations are also included, proactively ensure that such allocations are appropriately supportive of clean energy and avoid delivering windfall profits to emitting generators.⁴ The RGGI states also suggest that, should the EPA need to impose a FP, the EPA should allow and encourage auctioning of allowances in the affected state.

The RGGI experience overwhelmingly demonstrates the value of reinvesting the proceeds in programs that benefit ratepayers and reduce carbon emissions. RGGI proceeds have powered an investment of over \$1 billion in the energy future of the RGGI states. Over their lifetime, these RGGI investments are projected to save more than 48.7 million mmBTU of fossil fuels and 11.5 million MWh of electricity, avoiding the release of approximately 10 million short tons of carbon pollution.⁵ The investment of RGGI proceeds through 2013 is projected to return more than \$2.9 billion in lifetime energy cost savings to more than 3.7 million participating households and 17,800 businesses.⁷

These regional savings have been achieved while each state has retained individual discretion for investing RGGI proceeds. In general, the investments fall into four major categories: (1) Energy efficiency (62 percent of cumulative RGGI investments); (2) Clean and renewable energy (8 percent of cumulative RGGI investments); (3) Direct bill assistance (15 percent of cumulative RGGI investments); and (4) Greenhouse gas abatement (9 percent of cumulative RGGI investments).⁷ These investments, in concert with the broader energy policies of each RGGI state, have enabled the region to continue to set a national example in reducing harmful GHG pollution and improving the efficiency of the energy sector.

Independent analyses demonstrate that RGGI has supported economic growth, and that the value derived from auctioning allowances and re-investing the auction proceeds is an important contributor to these economic benefits. In 2015, the Analysis Group performed an

⁴ Several RGGI states have auction regulations that EPA and other states can look to for guidance. *See e.g.* Massachusetts: 225 CMR 13.00 *et seq* available at <http://www.mass.gov/eea/docs/doer/rggi/225-cmr-13-final.pdf>; Delaware: Section 11.0 of 7 DE Admin Code 1147 – CO2 Carbon Trading Program available at <http://regulations.delaware.gov/AdminCode/title7/1000/1100/1147.shtml#TopOfPage>; New Hampshire: Env-A 4800 *et seq* available at <http://des.nh.gov/organization/commissioner/legal/rules/documents/env-a4800.pdf>; New York: 21 NYCRR Part 507 available at <http://www.nyserda.ny.gov/About/Regional-Greenhouse-Gas-Initiative/21-NYCRR-Part-507>; and Rhode Island: Air Pollution Control Regulation No. 47 available at http://www.dem.ri.gov/pubs/regs/regs/air/air47_13.pdf.

⁵ <http://www.rrgi.org/docs/ProceedsReport/Investment-RGGI-Proceeds-Through-2013.pdf>.

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independent evaluation of the economic impact of the RGGI program for the years 2012-2014.⁶ The Analysis Group report concludes that this period (RGGI's second three-year control period) is generating \$1.3 billion in net overall economic benefits for the region, with each participating state experiencing positive net benefits. RGGI's effects during this period are reducing consumer energy bills by \$460 million, resulting in an increase of 14,200 job-years, and saving \$1.27 billion in payments to out-of-region fossil fuel providers.⁷ The Analysis Group concluded that this positive economic outcome resulted in large part from RGGI's auctioning of allowances and re-investment of proceeds.

In addition to the Analysis Group, Synapse Energy Economics, Inc. has conducted a high-level analysis to estimate the benefits of using the RGGI auction proceeds to fund energy efficiency programs in the participating states. A 2012 Synapse study evaluated energy efficiency programs for electricity and other fuels.⁸ The study found that, for every dollar of RGGI auction revenues that was invested in energy efficiency in 2010, participating states are receiving \$1.30 to \$6.80 in lifetime avoided energy costs, with a weighted average of \$2.30.

In addition to the clear benefits that auction and re-investment have brought to the RGGI states, economic analysis shows that auctioning allowances produces the most efficient outcomes.⁹ In light of this experience, the EPA should use the MR to encourage the auctioning of a substantial portion of allowances. Because it would provide for allowance auctions, the RGGI states strongly support the concept in the draft FP that allows states to take responsibility for allowance allocation and for the EPA to encourage auctioning of allowances.

Early in the development of the RGGI program, the RGGI states recognized that assigning allowances based on historical generation would provide windfalls to affected sources in RGGI. The RGGI states were concerned that regardless of allocation method, the costs of allowances would be passed on to ratepayers. In fact, for the firms that can pass most of the opportunity cost of allowances through to ratepayers, the value of the initial allowance windfall could substantially exceed any profit reductions incurred as a consequence of the need to charge higher prices to offset allowance costs.¹⁰ Indeed, experience from the Acid Rain program showed that cost of compliance was passed on to ratepayers, and emitters were able to reap windfall profits at ratepayer expense.¹¹ The RGGI states have shown that auctioning a substantial portion of allowances avoids such windfall profits.

⁶http://www.analysisgroup.com/uploadedfiles/content/insights/publishing/analysis_group_rggi_report_july_2015.pdf.

⁷http://www.analysisgroup.com/uploadedfiles/content/insights/publishing/economic_impact_rggi_report.pdf.

⁸<http://www.synapse-energy.com/sites/default/files/SynapseReport.2012-02.RAP..RGGI-Energy-Efficiency-Benefits.10-027A.pdf>.

⁹ Freely-allocating GHG allowances: Reducing carbon market efficiency and creating windfall profits, Jurgen Weiss and Mark Sarro, April 2009 available at http://www.brattle.com/system/publications/pdfs/000/004/797/original/Freely_Allocating_GHG_Allowances_Weiss_Sarro_Apr_2009.pdf?1378772131.

¹⁰ Terry Dinan, Trade-Offs in Allocating Allowances for CO₂ Emissions, Congressional Budget Office (April 25, 2007), available at https://www.cbo.gov/sites/default/files/cbofiles/ftpdocs/89xx/doc8946/04-25-cap_trade.pdf.

¹¹ *Id.*

III. The New Source Complement Is The Most Effective Means Of Preventing Leakage From Existing Sources To New Sources – Alternative Methods Must Be Equally Effective

EPA recognized in the final CPP that an existing-source-only mass-based program creates the potential for significant emissions leakage to new sources as compared to a mass-based program that includes existing and new sources. Such emissions leakage could undermine the emission reduction and public health outcomes that would be achieved by the CPP. EPA therefore required states implementing a mass-based emission reduction program to include in their state plans mechanisms that “address potential increased CO₂ emissions from new sources, beyond the emissions expected from new sources if affected EGUs were given emission standards in the form of the subcategory-specific CO₂ emission performance rates.”¹² EPA also proposed and took comment on two allocation strategies to address leakage in the proposed mass-based model rule.¹³

The most effective way to prevent leakage from existing sources to new sources is for a state to adopt the new source complement as a part of its state plan. Accordingly, the RGGI states support Model Rule language in the mass-based plan that includes the new source complement as the presumptively approvable way to prevent leakage to new sources. While the RGGI states acknowledge that set-asides can reduce incentives toward leakage, the degree of protection provided by EPA’s proposal may not be adequate to fully address leakage. Furthermore, the RGGI states note that EPA’s proposal for existing source-only programs contemplates free allocation to existing natural gas combined cycle (NGCC) units as a mechanism to reduce leakage although there is a long-term need to reduce emissions from these units, which would be supported by auction and reinvestment of proceeds. Recently published analyses conclude that alternatives to the new source complement in the FP and MR may not adequately reduce leakage to new sources, and do not achieve equivalence with emission reductions under a dual rate approach, as required by the CPP.¹⁴

To some extent, the magnitude of potential leakage is state-specific. This is evidenced by the fact that the EPA developed a different new source complement for each state. Similarly, even if allocation can effectively prevent leakage, the allocation strategy may need to vary from state to state. The RGGI states believe that these potential variations make it difficult to adequately address leakage in a presumptively approvable MR. Instead, the most direct avenue to addressing leakage is for states to adopt the new source complement.

Any state that does not adopt the new source complement should carry the burden of demonstrating that its method of addressing leakage will result in limiting CO₂ emissions in a manner that is consistent with the level of the new source complement developed by the EPA for that state. To the extent that leakage can be addressed through set-asides and/or an allocation methodology, this may require modeling of that state in the context of its plan submittal process.

¹² Clean Power Plan, 80 Fed. Reg. at 64949 (to be codified at 40 C.F.R. § 60.5790(b)(5)).

¹³ Proposed Federal Plan, 80 Fed. Reg. at 65019.

¹⁴ M.J. Bradley & Associates, EPA’s Clean Power Plan: Summary of IPM Modeling Results 19 (2016), <http://mjbradley.com/news-events/mjba-releases-comprehensive-analysis-clean-power-plan>; Dallas Burtraw et al., Resources for the Future, CO₂ Emissions Leakage to New Sources under the Clean Power Plan (2016).

Therefore, absent the new source complement, the proper context to address leakage is the state plan submittal process, not the MR.

IV. The EPA Should Adopt A Trading Platform That Is Flexible and Customizable To Encourage Broader Trading Markets

As discussed above, the RGGI states' experience demonstrates that trading will result in the most cost-effective compliance with the CPP. Therefore, the EPA should do everything it can to encourage broader trading markets. In addition to encouraging states to adopt mass-based programs, the EPA should also encourage trading by including elements in the MR and FP that would make it easier for states to trade with each other. It is particularly important for the EPA to adopt a trading platform that is flexible, can be customized, and can interface easily with other platforms. The RGGI states have had success utilizing the RGGI CO₂ Allowance Tracking System ("COATS") to track emissions and allowances since 2009 and would like to see the EPA develop a platform that would easily link with COATS, or allow for a seamless transition to an EPA administered platform that would not disrupt the market. Promoting flexibility and an ability to customize is important because it would allow states like the RGGI states to retain elements of existing platforms, while enabling other states to develop programs that best suit their particular needs.

V. The EPA Should Allocate CEIP Allowances More Equitably

The RGGI states strongly support the EPA's goal of encouraging early action by focusing on renewable energy development and investment in energy efficiency programs in low income communities through the Clean Energy Incentive Program ("CEIP"). The RGGI states are already making significant investments in energy efficiency improvements in low income communities and will continue to do so.¹⁵ In addition to the ongoing commitment, each of the RGGI states is in the process of engaging low-income and vulnerable communities as part of the 2016 Program Review and the development of individual RGGI State Plans.

RGGI is in the process of studying how the CEIP will interact with the existing RGGI program. If the eight RGGI states that are subject to the CPP choose to participate in the CEIP, the maximum eligible amount of MWh would be equivalent to 12 million allowances (6 million allowances from the RGGI budget and 6 million allowances matched from the EPA), totaling just 2% of the available CEIP allowances. EPA's approach of allocating CEIP allowances based upon the amount of reductions from 2012 levels that the affected EGUs in each state are required to achieve relative to those in other states disadvantages states that have already made substantial progress toward reducing the carbon intensity of their generation fleets. Accordingly, the RGGI states encourage the EPA to develop and utilize an alternative allocation formula that more fairly rewards early action among all states.

Because RGGI is a mass-based program, the participating states will carefully weigh the administrative costs of adapting RGGI's well-established EM&V programs to conform to EPA

¹⁵ Examples of low income investments in the RGGI states are provided in Attachment A.

requirements when considering whether to participate in the CEIP. The RGGI states have demonstrated a historical commitment to low-income energy efficiency programs, which will continue irrespective of RGGI's CEIP participation. The RGGI states encourage the EPA to tailor EM&V requirements appropriately to ensure that the required EM&V programmatic changes do not become a barrier to CEIP participation for states submitting mass-based plans, which would not otherwise need to adopt their EM&V protocols. These potential administrative costs, coupled with the uneven opportunity to earn credits or allowances among the various states, could discourage mass-based states with smaller prorated availability of CEIP allowance shares from participating in the CEIP. To avoid this outcome, and ensure that the benefits of the CEIP are shared as widely as possible, EPA should finalize the CEIP in a way that avoids excessive costs and other implementation barriers such as those discussed above.

VI. The EPA Should Support State Energy Efficiency Programs

As discussed above, EE plays a key role in the RGGI program. State EE investments, supported by auction revenue and other funding sources, reduce the need to operate polluting power plants and provide significant economic benefits to consumers. Because EE savings cannot yet be measured directly, rigorous EM&V methods are used to ensure that programs deliver real energy savings as cost-effectively as possible. For rate-based states, where accurate accounting of EE savings is needed to ensure the environmental integrity of emission rate credits ("ERCs"), the EPA support for rigorous EM&V standards, as well as for EM&V resource allocation that maximizes the overall reliability of EM&V results, is of obvious importance. However, the RGGI experience clearly shows that successful implementation of EE programs must be an important component of the CPP implementation process in all states, regardless of plan type.

Based on RGGI's experience implementing complex EE programs in mass-based states, the RGGI states are very aware of the need to balance accurate measurement of EE savings with the need to avoid excessive EM&V costs. For states with mature and successful EE programs, this means ensuring that their existing rigorous EM&V methods are fully recognized by the CPP (e.g., in the allocation provisions of the mass-based model trading rule, including the CEIP). To support the development of similar programs in other states, the EPA should continue to work with states and other agencies toward standardization of EM&V methodologies and tracking systems that can be referenced in the EPA guidance documents.¹⁶ The RGGI states are confident that this is the best way to help states realize the benefits of EE while protecting the environmental integrity of the CPP.

VII. Summary

In summary, the RGGI states are pleased to provide these comments on the proposed FP and MR. RGGI's track record of successful implementation of a mass-based trading program demonstrates that a mass-based approach is a cost-effective way to achieve substantial CO₂

¹⁶ Examples of the types of programs that EPA should support include US DOE's Uniform Methods Project, and The Climate Registry's efforts to develop a national Energy Efficiency registry.

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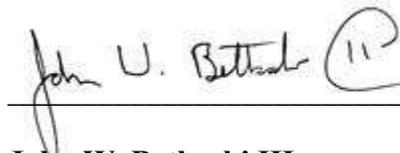
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emissions reductions. The RGGI states encourage the EPA to adopt a mass-based program for states that are placed in the FP. The EPA should encourage the auctioning and reinvestment of proceeds. The RGGI states also believe that the EPA should promote the new source complement as the most effective way to address leakage from existing sources to new sources. The EPA should adopt a trading platform that is flexible and can be customized. The EPA should utilize an allocation formula for CEIP allowances that fairly rewards early action among all states.

Sincerely,



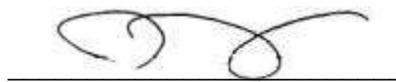
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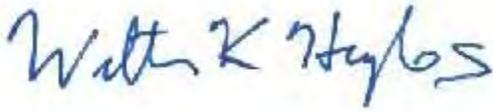
Carlisle McLean
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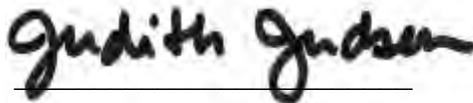
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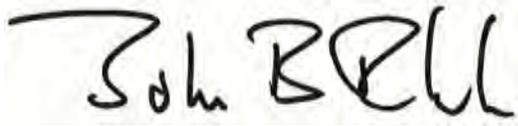
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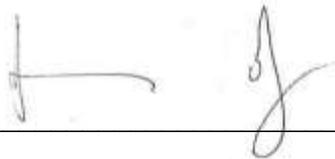
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Deborah Markowitz
Secretary
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James Volz
Chairman
Vermont Public Service Board

Attachment A – Low Income Energy Efficiency Investments in the RGGI states

Examples of low income investments include:

- CT: In 2015 Connecticut ratepayers invested more than \$28 million annually to provide energy efficiency services to more than 19,000 residents below 60% of the state median income, resulting in approximately 25,000 tons of carbon dioxide emissions reductions. RGGI auction proceeds have supplemented these funds, ensuring that, regardless of fuel type, all households can fully participate in energy efficiency programs. At times RGGI funds have also provided emergency assistance through the emergency replacement of heating equipment that is unsafe or inoperable with high efficiency equipment for low-income residents.
- DE: Delaware invests 10% of the RGGI auction proceeds on its low income Weatherization Assistance Program with an additional 5% directed toward the Low Income Heat and Energy Assistance Program. The bulk of Delaware's RGGI proceeds (at least 65%) are invested with the Sustainable Energy Utility which is a unique non-profit organization offering a one-stop resource through its Energize Delaware initiative to help residents and businesses save money through clean energy and efficiency."
- ME: Efficiency Maine Trust is statutorily obligated to provide minimum funding levels for low-income energy efficiency. In 2014 the Trust helped 710 electrically heated low-income units in 33 buildings and 297 natural gas heated low-income units in 15 buildings. Together, the units will save 24.49 million kWh and 88,952 MMBtu over the lifetime of measures installed.
- MA: Under the Green Communities Act of 2008, Massachusetts must spend at least 10 per cent of the electric energy efficiency budget and at least 20 per cent of the gas budget on "comprehensive low-income residential demand side management and education programs."
- MD: 16,795 limited-income customers participated in EmPOWER Maryland through the Residential Limited-Income Programs. Of the program-to-date participants, 5,297 limited-income households participated in 2014, representing 32% of the total participants to-date. The average savings per participant is 2,995 kWh per year. Program-to date spending on Limited-Income programs is \$88.6 million, which accounts for 21% of the total cost of the Utilities' residential portfolios.
- NY: From 2012-2015, New York State funded the EmPower New York program at \$179.6 million through the Energy Efficiency Portfolio Standard (EEPS) to provide comprehensive energy efficiency improvements to low-income households at no cost. The funding level represents 30% of the EEPS statewide residential energy efficiency budget. Additionally, New York State has allocated \$17 million from the Regional Greenhouse Gas Initiative to fund energy efficiency improvements for low-income households over the same time period. More than 48,000 low-income customers participated in EmPower New York from 2012 to 2015. On average households that received energy efficiency services saved 600 kWh and 28 MMBtu on an annual basis. In addition, since October 2015, New York State has allocated roughly \$6 million to low-income solar projects; NH: By statute, invests 15% of auction proceeds that go to programmatic efforts to its low-income core energy efficiency program.

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- RI: Rhode Island invests a significant portion of RGGI dollars to help low income customers use energy more efficiently and reduce their energy bills. Over 13% of the electric efficiency budget and over 20% of the natural gas efficiency budget are allocated to this sector. Services provided include three levels of energy assessments and installation of recommended measures including, but not limited to, upgrades for heating and domestic hot water systems, cooling equipment, lighting and appliances.
- VT: Vermont dedicates its share of proceeds from RGGI's quarterly auctions for thermal energy efficiency efforts. Current performance standards for the state-wide energy efficiency utility require that total low-income spending be greater than 17% of total thermal energy efficiency expenditures.