

Regional Greenhouse Gas Initiative

an Initiative of the Northeast and Mid-Atlantic States of the U.S.

December 1, 2014

RGGI States Provide Supplemental Comments Supporting EPA Proposed Clean Power Plan

Today, the nine Northeastern and Mid-Atlantic states participating in the Regional Greenhouse Gas Initiative (RGGI), the nation's first market-based emissions trading program to reduce greenhouse gas pollution, submitted [supplemental joint comments](#) to the United States Environmental Protection Agency (EPA) supporting the proposed Clean Power Plan (CPP). The supplemental comments build on the RGGI states' [November 5th comments](#) to EPA supporting the structure of the CPP while offering suggested improvements.

In the supplemental comments, the RGGI states respond to the additional building block proposals and questions presented by the EPA in the October 28th *Notice of Data Availability and Supplemental Proposal*. The RGGI states also provide comments on the November 6th *Translation of the Clean Power Plan Emission Rate-Based CO₂ Goals to Mass-Based Equivalents Technical Support Document (RTM TSD)* in which EPA outlines one potential approach that states may use to convert rate-based targets to mass-based emission caps.

The RGGI states emphasize that mass-based emission programs are the most cost-effective, transparent, and reliable way to achieve emission reductions and encourage EPA's efforts to facilitate this compliance pathway for states. In the comments submitted today, the RGGI states recommend that EPA develop rate-to-mass translations that maintain flexibility, but also recognize the complexity of our electric grid and provide sufficient oversight to ensure equivalency with the rate-based targets.

The RGGI states also reiterate that additional cost-effective reductions under the CPP can be achieved nationwide and that revisions to the proposed state targets are needed to ensure that early actions to reduce power sector carbon pollution are recognized.

About the Regional Greenhouse Gas Initiative

The Northeast and Mid-Atlantic states participating in the second RGGI control period (Connecticut, Delaware, Maine, Maryland, Massachusetts, New Hampshire, New York, Rhode Island, and Vermont) have implemented the first mandatory market-based regulatory program in the U.S. to reduce greenhouse gas emissions. The 2014 RGGI cap is 91 million short tons. The RGGI cap then declines 2.5 percent each year from 2015-2020.

RGGI is composed of individual CO₂ budget trading programs in each state, based on each state's independent legal authority. A CO₂ allowance represents a limited authorization to emit one short ton of CO₂, as issued by a respective state. A regulated power plant must hold CO₂ allowances equal to its emissions to demonstrate compliance for each three-year control period. RGGI's second control period began on January 1, 2012 and extends through December 31, 2014. For more information, please visit www.rggi.org.

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