

The point of RGGI is to reduce or eventually eliminate greenhouse gasses, because greenhouse gasses from burning fossil fuels are a form of pollution that are the cause of a climate crisis.

Consequently, aspects of RGGI that run counter to this statement are problematic, and the work we do going forward, whether it's changes we make to RGGI, or even the way we model projections about RGGI matter very much.

The so-called "cost-containment reserve" (CCR)— which allows additional pollution when prices are higher— is therefore way out of date. Pollution is itself a cost, after all!

While one may say either that it may satisfy legislative temperaments or that without it "allowances" might need to be adjusted, both those approaches are still wrong-headed. It's time for both RGGI.inc and our public agencies (DES) to be honest with the public and their legislatures. While it is the public and the legislature that has the political power, it's RGGI and the state agencies that can inform.

Beyond The CCR, attention should be given to the limitations of scale. RGGI is not enough to address the climate crisis, and research needs to focus on what else might be needed, especially in development of renewables. Also we need to look at the way energy policy adversely affects vulnerable populations, causing climate injustices.

Finally, we need to address the arrival of the false salvation of natural gas. It's still a fossil fuel. It pollutes. Its extraction is not a clean process. Ditto its transmission over land. Research modeling ought to reflect sane limits on its expansion.