LIZ KRUEGER
SENATOR, 28TH DISTRICT
ALBANY OFFICE
LEGISLATIVE OFFICE BUILDING
ROOM 808
ALBANY, NEW YORK 12247
(518) 455-2297
FAX (518) 426-6874
DISTRICT OFFICE
1850 SECOND AVE
GROUND FLOOR
NEW YORK, NEW YORK 10128
(212) 490-9535
FAX (212) 490-2151
E-MAIL
LKRUEGER@NYSENATE.GOV

NEW YORK
STATE
SENATE
ALBANY, NEW YORK 12247

RANKING MINORITY MEMBER
FINANCE
COMMITTEES:
CODES
ELECTIONS
HIGHER EDUCATION
HOUSING, CONSTRUCTION
& COMMUNITY DEVELOPMENT
MENTAL HEALTH &
DEVELOPMENTAL DISABILITIES
RULES

Stakeholder Comments on the 2016 RGGI Program Review
November 30, 2016

As elected legislators representing the interests of the people of the State of New York, we appreciate the opportunity to submit comments regarding the 2016 RGGI Program Review. Climate change is the single greatest threat facing our state, our nation, and our planet, and RGGI is and must continue to be a vital part of a comprehensive approach to reducing GHG emissions and avoiding the worst effects of the climate crisis.

We were dismayed that the Stakeholder Meeting held on November 21, 2016, did not include modeling scenarios for a 5% annual decline in the emissions cap. During this review process it is essential that no feasible emissions reduction scenario be taken off the table. By any reasonable analysis, a 5% cap decline is not only feasible, but is a conservative goal relative to actual emissions reductions achieved under the current cap. We urge you to continue modeling and consideration of the 5% scenario as the minimum acceptable rate of decline to efficiently and cost-effectively achieve the 2030 and 2050 emissions reduction goals of the RGGI member states.

Since RGGI's inception in 2009, member states have seen a reduction of emissions well below that mandated under the current cap. Actual emissions reductions have averaged 3.8 million tons per year (with electricity rates falling an average of 2%), compared to a RGGI cap averaging 2.1 million tons per year through 2020. A 2.5% cap reduction scenario for 2020-2030 would result in mandated reductions of only 1.95 million tons per year, half the current rate, and potentially too low to reach states' climate targets. A 5% scenario would lead to mandated reductions of 3.9 million tons per year, on par with historical reductions, though still less of a reduction than current trends project through 2030.

According to the March, 2016 report from Synapse Energy Economics, a 2030 RGGI cap of 39 million tons provides the least-cost pathway to achieving states' economy-wide 2030 emissions targets. A 39 million ton cap by 2030 is the same level proposed under the 5% scenario. The Synapse report also demonstrates that such a cap would lead to energy ratepayer savings of $25.7 billion and the creation of an average of 58,400 new jobs per year across member states.

Now is not a time for half-measures or taking backward steps, which is exactly what a 2.5% cap reduction rate represents. The realities of climate change mean that bold action is not only the prudent course, but it is the minimum required to avoid catastrophic effects. Those effects will be felt by all of us, our children and grandchildren, and particularly our most vulnerable citizens. We request that you keep them in mind as you continue the review process, and we strongly urge you to consider at least a 5% annual cap reduction rate for 2020-2030.

Sincerely,

Liz Krueger
State Senator
28th District

Brad Hoylman
State Senator
27th District

Tony Avella
State Senator
11th District

Neil D. Breslin
State Senator
44th District

Martin Malavé Dilan
State Senator
18th District

George Latimer
State Senator
37th District

Velmanette Montgomery
State Senator
25th District

Kevin S. Parker
State Senator
21st District

Jose Peralta
State Senator
13th District

Bill Perkins
State Senator
63rd District

Roxanne J. Persaud
State Senator
19th District

Gustavo Rivera
State Senator
33rd District

James Sanders, Jr.
State Senator
10th District

José M. Serrano
State Senator
29th District

Daniel L. Squadron
State Senator
26th District

Toby Ann Stavisky
State Senator
16th District