



Nicole Singh, Executive Director
RGGI, Inc.
90 Church Street, 4th Floor
New York, NY 10007

RE: Comments of the Vermont Chapter of the Sierra Club Regarding RGGI 2016 Program Review

Dear Ms. Singh and Members of the RGGI Board:

On behalf of the 9,000 members and supporters of the Vermont Chapter of the Sierra Club, we would like to thank you for your leadership in driving reductions in carbon pollution in the Northeast through the Regional Greenhouse Gas Initiative (RGGI) and for the opportunity to comment on the program review process. RGGI has been a shining example of effective policy to promote a clean energy economy and cost effectively reduce harmful greenhouse gas emission.

In order to ensure that RGGI successfully meet the needs of its member states, we urge you to consider the inclusion of aggressive emissions reduction targets in your review process. While we applaud initial plans to consider reducing pollution by more than 20 million tons from 2020 to 2030, all nine RGGI states have specified greenhouse gas reduction targets at or above 35% by 2030 and a disproportionate share of the reductions will likely have to come from the electric power sector. Failure to model an emissions reduction scenario that achieves these goals would undermine our ability to meet our state climate goals in Vermont and in the eight other RGGI states.

In addition, since the accuracy of the reference case is vital to assessing the impacts of alternative policy scenarios, we urge you to use the best possible information about renewable costs and performance and to include impacts of relevant energy policies in the reference case. For purposes of projecting forward cost and performance trends, we recommend that the RGGI states use NREL's 2015 Annual Technology Baseline (ATB). The ATB includes detailed cost and performance data (both current and projected) for both renewable and conventional technologies and is widely accepted for the type of modeling that the RGGI states are conducting. Finally, we believe it is vital that the extension of the Investment Tax Credit (ITC) and the Production Tax Credit (PTC) for renewables are included in the model, as the policies significantly impact the cost competitiveness of renewable energy compared to other resources.

Again, we believe that RGGI has been a success for the environment and the economy of the RGGI states. We encourage you to expand on the success by supporting emissions targets that are consistent with the goals of the RGGI member states.

Respectfully submitted,


Mark Nelson

Executive Committee Chair
Vermont Chapter of the Sierra Club

Jonathan Dowds
Energy Committee Chair
Vermont Chapter of the Sierra Club