CHESAPEAKE PSR PHYSICIANS FOR SOCIAL RESPONSIBILITY

1985 NOBEL PEACE PRIZE

May 27, 2016

Secretary Ben Grumbles
Maryland Department of the Environment
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Dear Secretary Grumbles,

This has been a good year in Maryland for emissions reductions with the renewal of the GGRA, the unanimous agreement to reduce GHG emissions 40% by 2030, and the PSC order mandating a 2% annual reduction in demand.

Now it's time to choose actions that will propel us toward the goals upon which we have all agreed.

RGGI is a very successful program and it has been very lucrative to the states. But the funds from selling allowances are only a small part of the economic bonus for reducing emissions. The health co-benefits of reducing deadly air pollution in Maryland also provide a substantial economic benefit.

We all know that the ozone and particulates associated with electric generation cause asthma and intensify cardiovascular disease. This cost of power generation has been paid by Marylanders for decades through damaged health and premature death. Maryland's economy also suffers from health impacts of air pollution: taxpayers foot the bill for air-pollution related illness, businesses suffer from reduced productivity due to missed work days, and every school day missed by an asthmatic student sabotages our economic future.

A paper this month in Nature Climate Change[1] quantifies the health and economic benefits that will accrue from the changes required in the electric sector to limit global temperature rise to 2 C. This study found that emissions reductions from the electric sector will prevent about 29,000 asthma attacks and 15 million missed work days nationwide. Moreover, the electric sector's contribution to holding global temperatures will reduce PM2.5 enough to prevent 175K premature deaths, while 4000 premature deaths will be avoided from reductions in ozone.

Finally, the economic value of the health benefits from cleaning up the power sector and reducing air pollution are estimated at about $800 billion nationwide[1]. However, according to this analysis, even the most conservative models with costs that are 10x higher than EPA estimates produce monetary benefits that are 5-10 times the costs of implementation.

Maryland is in the geographical region that will receive the greatest health benefits from reducing power plant emissions. Maryland's air quality is clearly still unacceptable--this is only May, yet today is the 3rd ozone action day in a row.

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RGGI is a highly cost-effective way to reduce emissions. CPSR joins the large group of other organizations urging you to obtain the information required to choose an adequate schedule of cap reductions for 2016-2030. In order to obtain sufficient information, it is imperative to expand the modeling effort to include at least a 5% cap reduction and preferably a range of other options (say 3% and 7 %). Any modeling study should investigate a wide enough range of options so that parameter values that are clearly too large or too small can be identified. Obviously, the level cap currently specified will be inadequate to allow RGGI states meet their 2030 goals.

Without the information obtained by modeling a range of annual cap reductions (including 5%), the RGGI states may not be able to determine the most effective course of action. They might even adopt a plan that will cause Maryland and other RGGI states to miss their 2030 emissions goals and then to fail to hold global temperature increase to <2C. This would indeed be a fatal error.

If we are to meet the 2030 GGRA goals, we can't focus just on RGGI, we need to strengthen each of the "top 10" emissions reductions programs presented in MDE's Oct. 16 analysis of the GGRP. In particular, it is crucial to strengthen Maryland's energy efficiency programs, including EmPOWER MD. Energy efficiency is the cheapest, cleanest and healthiest way to reduce emissions—it costs on average only 2.6c to avoid using a kwh, but 8-10c to generate that kwh.

Yes, there is an upfront cost to energy efficiency. **But it is wrong, even deceitful, to pretend to the citizens of Maryland that the relatively small rate increase for energy efficiency programs is not offset many times over by the savings they will enjoy from reduced energy usage and control over the costs of additional generation capacity.** The current Administration should give people the whole story—the rates might increase, but the reduction in use will still reduce the bottom line of our electric bills.

To avoid a very painful future, we will need to employ every emissions reduction tool we have. When it comes to RGGI, we don't have time to choose a cap reduction that is too low, just to discover in 10 years that our choice was totally inadequate. There will be no do-overs on this one, so it is hard to overstate the importance of modeling enough cap-reduction scenarios to allow the RGGI states to make an informed choice about the future course of emissions in the Northeast.

Thank you for the opportunity to comment.

Sincerely,

Sara Via

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[1]Shindell, DT, Y Lee and G. Faluvegi. 2016. Climate and health impacts of US emissions reductions consistent with 2°C. Nature Climate Change, 6, 503-509