



October 6, 2017

Andrew McKeon, Executive Director  
RGGI, Inc.  
90 Church Street, 4th Floor  
New York, NY 10007  
[info@rggi.org](mailto:info@rggi.org)

RE: Comments on Draft Proposed Model Rule Amendments

Dear Executive Director McKeon and Members of the RGGI Board:

As a Boston-based nonprofit organization working with the nation's most influential businesses and institutional investors to build a more sustainable economy, Ceres commends the states participating in the Regional Greenhouse Gas Initiative (RGGI) for their proposal to extend and strengthen the program through 2030. RGGI sets an example for the rest of the nation that states can lead the transition to a clean energy future while growing the economy.

Ceres and many of our company and investor members recognize that RGGI has a strong record of success in reducing electric-sector carbon emissions while fostering economic growth. Smart, collaborative policies like RGGI have the power to positively transform the economy and generate the carbon reductions needed to protect people and the planet.

Strengthening RGGI will allow participating states to further capture the program's economic value while accelerating the transition to a low-carbon economy. Ceres commends the RGGI states for their leadership in extending and strengthening the emissions cap, for fully adjusting the cap for banked allowances, and for adjusting the trigger price and influence of the Cost Containment Reserve (CCR). We also applaud the seven states that have committed to implement an Emissions Containment Reserve (ECR), which can work in conjunction with the CCR to adjust the system more appropriately to market conditions while capturing low-cost emissions reductions. We encourage the remaining states to adopt the ECR as well.

Looking forward, Ceres encourages RGGI states to finalize and adopt the proposed updated model rule swiftly and, to the extent possible, to utilize RGGI proceeds toward renewable energy and energy efficiency programs that will further build upon RGGI's economic and environmental successes. RGGI states should also consider exporting their success by expanding their model to other states and other sectors of carbon emissions.

Ceres and some of our business partners, quoted below, commend the bipartisan group of nine Northeast and Mid-Atlantic states for working together and stepping up to tackle climate change at this crucial time. We look forward to continuing to work with states as the proposal is implemented.

Sincerely,

Anne Kelly  
Senior Director, Policy and BICEP Network  
Ceres

Sample of statements from business and investor leaders regarding RGGI's 2017 proposed Model Rule update:



“As a global commercial real estate firm, JLL understands that investing in clean energy is good for our clients’ bottom line. The regional approach of RGGI allows multiple states to meet their commitments to reducing emissions and investing in clean energy, which enhances our ability to provide our clients with greater clean energy solutions.” – **Cynthia Curtis, Vice President of Sustainability at JLL**



“As investors who take seriously the risks of climate change, we applaud the governors’ decision to not only extend, but also strengthen the emission reduction trajectory through 2030. The RGGI program is a proven success at reducing carbon and growing the economy. Investing in clean energy can help lower energy bills and hedge against volatile energy prices. These new commitments present a win-win for investors, businesses, communities and our planet.” – **Susan Baker, Vice President Shareholder Advocacy, Trillium Asset Management**



“We commend the governors for extending and strengthening the RGGI in support of a carbon free economy. This is a crucial commitment in ensuring a healthy planet for future generations. We encourage state legislatures to follow the Governors’ commitment and deliver on a more secure energy future.”— **Joey Bergstein, CEO, Seventh Generation**



“Through its market-friendly design, RGGI is a cost-effective insurance policy helping manage risks of climate change while expanding the region’s economy. A stronger RGGI program will send the market signals to unlock additional clean energy investments and the jobs and economic growth that accompany them. Walden Asset Management applauds RGGI states for their environmental leadership and commitment to invest in their economic future.” – **Aaron Ziulkowski, Manager, ESG Integration, Walden Asset Management**



“It is good to see state governments stepping up to fill the national leadership vacuum in the U.S. on climate policy. Strengthening RGGI will help to address the risks that climate change creates for everyone, investors included.” – **Julie Fox Gorte, Ph.D., Senior Vice President for Sustainable Investing, Pax World Management LLC**



“The decision announced by the nine RGGI Governors is a clear example of bipartisan states stepping up together to make real progress on reducing carbon emissions. As a New England manufacturer that recognizes the importance and cost-savings benefits of clean energy, Worthen Industries commends the nine RGGI Governors for their leadership.” – ***Dennis Sasseville, Director of Corporate Sustainability & Quality Systems, Worthen Industries***



“At Ben & Jerry’s, we understand the transition to a low carbon economy requires strong leadership from businesses, political leaders, communities, and individuals alike. As a Vermont based company, we’re incredibly pleased to see the 9 RGGI states step up to extend and strengthen the initiative through 2030. This leadership is critical as the world works to meet the commitments of the Paris Agreement.” – ***Chris Miller, Activism Manager, Ben & Jerry’s***