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April 26, 2016

Hon. Andrew M. Cuomo  
Governor of New York State  
New York State Capital Building  
Albany, NY 12224

**To Governor Andrew Cuomo,**

On behalf of the organizations and businesses signed below, we thank you for your leadership in moving New York toward a 21<sup>st</sup> century renewable energy economy. In your 2015 New York State Energy Plan, your administration set a goal of reducing economy-wide climate pollution 40 percent by 2030. Since then, your commitment to move New York beyond coal, coupled with bold renewable energy initiatives such as NY-SUN, Reforming the Energy Vision (REV), the Clean Energy Fund, and the pending Clean Energy Standard, has helped put this goal into action and has positioned New York as a national leader on climate and clean energy.

**This year, New York has another opportunity to lead the nation and take a major step forward in achieving its climate targets by advocating for a stronger Regional Greenhouse Gas Initiative (RGGI).** As you know, RGGI is the pioneering, market-based program launched by New York and other Northeastern and Mid-Atlantic states, to cut carbon pollution from the electric sector.

RGGI has helped New York reduce climate pollution while creating jobs in the clean energy sector. RGGI has helped participating states reduce carbon pollution in the electric sector by 35 percent,

even as the regional economy grew by more than 21 percent.<sup>1</sup> New York has invested the majority of revenues raised through RGGI in the state's energy efficiency and renewable energy programs, which have boosted economic growth, resulting in over \$700 million in value added to the state's economy and more than 9,000 job-years.<sup>2</sup>

On top of these economic gains, RGGI has produced public health benefits of more than \$1.1 billion to New York by reducing emissions of dangerous pollutants in addition to carbon pollution — including sulfur dioxide, nitrogen oxides, and particulate matter — that pour out of power-plant smokestacks.<sup>3</sup>

In 2016, New York and its regional partners are undertaking a review of the RGGI program to determine the carbon pollution cap that the region's power sector must meet between 2020 and 2030. **This 2016 review is a significant opportunity to achieve New York's State Energy Plan goals by making further progress through RGGI.** With the federal Clean Power Plan on hold, it has also never been more important for climate leaders like New York to take the reins and lead the Northeast—and the nation—toward truly ambitious action on climate and renewable energy.

**If New York wants to stay on track to seriously cut carbon and grow our economy, we must take the lead in advocating for a new RGGI cap that aligns with New York's economy-wide goal of reducing climate pollution by 40 percent by 2030. We urge you to support a RGGI emissions cap that continues to decline from 2020 to 2030, and to consider annual cap reductions equivalent to 5 percent of 2020 emissions.** A 5 percent annual reduction aligns with average annual reductions achieved in the region since RGGI's inception, and is consistent with studies showing that the power sector must cut emissions further and faster than other sectors in order to achieve the economy-wide long-term climate goals in a cost-effective manner.<sup>4</sup> According to a recent analysis by Synapse Energy Economics, a cap reduction of this level would also help create 36,958 jobs above business as usual in New York by 2030, saving consumers more than \$3 billion and reducing carbon pollution by 37 million short tons that year – as much as adding 6.8 million electric vehicles powered by wind and solar energy.<sup>5</sup>

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<sup>1</sup> Acadia Center (2015), *The Regional Greenhouse Gas Initiative: A Model Program for the Power Sector*, at 11, available at [http://acadiacenter.org/wp-content/uploads/2015/07/RGGI-Emissions-Trends-Report\\_Final.pdf](http://acadiacenter.org/wp-content/uploads/2015/07/RGGI-Emissions-Trends-Report_Final.pdf).

<sup>2</sup> See Analysis Group reports on RGGI from 2011 ([http://www.analysisgroup.com/uploadedfiles/content/insights/publishing/economic\\_impact\\_rggi\\_report.pdf](http://www.analysisgroup.com/uploadedfiles/content/insights/publishing/economic_impact_rggi_report.pdf)) and 2015 ([http://www.analysisgroup.com/uploadedfiles/content/insights/publishing/analysis\\_group\\_rggi\\_report\\_july\\_2015.pdf](http://www.analysisgroup.com/uploadedfiles/content/insights/publishing/analysis_group_rggi_report_july_2015.pdf)).

<sup>3</sup> Acadia Center (2015), *Appendix to RGGI: A Model Program for the Power Sector*, available at [http://acadiacenter.org/wp-content/uploads/2015/07/Appendix\\_Monetized-Benefits-of-Avoided-Emissions.pdf](http://acadiacenter.org/wp-content/uploads/2015/07/Appendix_Monetized-Benefits-of-Avoided-Emissions.pdf).

<sup>4</sup> See, e.g., EPA Analysis of the Waxman Markey Discussion Draft, 2009, available at <http://www3.epa.gov/climatechange/Downloads/EPAactivities/WM-Analysis.pdf>.

<sup>5</sup> Synapse Energy Economics (2016), *The RGGI Opportunity 2.0*, available at [http://www.synapse-energy.com/sites/default/files/RGGI\\_Opportunity\\_2.0.pdf](http://www.synapse-energy.com/sites/default/files/RGGI_Opportunity_2.0.pdf).

A stronger RGGI must also acknowledge that the impacts of power generation and of climate change often fall disproportionately on underserved communities. **New York can lead the way in making sure an environmental justice analysis is central to the RGGI planning during the current program review.** It is critical that the communities burdened by the impacts of climate change have a say in how RGGI is implemented and how funds are distributed to ensure that RGGI funds benefit communities on the front-lines of the climate and environmental crisis, and ensure racial and economic equity in the application of emission reduction policies.

With New York's record of clean energy leadership, we are confident that we can lead the Northeast in negotiating a stronger and more just RGGI. New York's families and businesses will thank you for your continued renewable energy and climate leadership.

Sincerely,

Marilyn Vasta  
350NYC

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Cc:

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