



June 1, 2007

Chris Nelson
Climate Change Policy Coordinator
Connecticut Department of Environmental Protection
Climate Change and Energy Programs
79 Elm Street
Hartford, CT 06106

Dear Mr. Nelson,

Citizens Campaign for the Environment (CCE) is an 80,000-member, non-profit, nonpartisan, advocacy organization working to protect public health and the natural environment in New York, Connecticut and New Jersey. CCE works to build widespread citizen understanding and advocacy for policies and actions designed to manage and protect interdependent land and water resources, wildlife and public health.

CCE actively promotes policies and actions at the local, state, and federal level that reduce greenhouse gases and promote clean, renewable energy solutions. CCE applauds the Connecticut State Department of Environmental Protection (DEP) – and in particular your office – for moving forward with the Regional Greenhouse Gas Emission (RGGI) process and for taking a necessary step towards reducing greenhouse gas emissions from the electricity generating sector.

CCE found overwhelming public support for Connecticut's participation and leadership in RGGI. The public clearly recognizes that global climate change is a significant problem that requires a strong commitment from our government and regulating community to develop and adopt policies and rules to ensure an overall reduction in greenhouse gas emissions.

CCE offers the following specific comments on the rule pre-proposal:

1. Retiring Credits Voluntary (Section 22a-174-31(e)(4))

CCE is very supportive of and applauds the DEP for reducing the state carbon cap when citizens of the state choose to purchase renewable energy. This provision adds value to existing state programs promoting individuals purchasing renewable energy. Through this added value, Connecticut residents are empowered to control their own carbon footprint and contributions to climate change.

2. Allocation Method (Section 22a-174-31(f)(3)(C))

CCE strongly urges the DEP to join other states in committing to auction 100% of credits allocated to Connecticut. This method gives Connecticut residents the best opportunity to invest in important energy efficiency, renewable and conservation technologies. Any percentage less than 100% represents the weakest regulation in the RGGI region. This dubious distinction is not consistent with the strong environmental leadership that Connecticut has historically exhibited. The revenue raised through credit auctions can provide funding for important public benefit programs while reducing Connecticut's contribution to global climate change. **CCE understands that over 300 individuals from the state submitted letters urging the DEP to sell 100% of the RGGI credits through an auction process. Additionally, over 3,300 Connecticut residents signed petitions supporting the adoption of a regional approach to reduce greenhouse gases that cause global warming and the establishment of a polluter-pay system to support developing energy efficiency and clean energy technology.**

3. Consider reducing caps or reserving a portion of allocated credits

CCE supports the strongest possible cuts in carbon emissions, including withholding some credits from being sold. CCE is concerned that RGGI may be undermined if the market becomes flooded with carbon credits, resulting in a delayed carbon reductions. The current 2009 allocations is a projected estimate of the amount of carbon emitted in 2008, which may be overestimated. **To ensure vibrant carbon markets that incentive the regulated community to reduce greenhouse gas emissions as swiftly as possible. CCE urges the DEP to be conservative with the total amount of carbon credits released for auction.**

In closing, CCE commends all Connecticut State officials and staff for their creativity, persistence, and investment to make RGGI a reality for our region. CCE appreciates the opportunity to comment on Connecticut's rule pre-proposal for implementing the Regional Greenhouse Gas Initiative.

Sincerely,

Emmett Pepper
Connecticut Program Director

cc: Hon. Jodi Rell, Governor
Hon. James A. Amman, Speaker of the House
Hon. Christopher G. Donovan, House Majority Leader
Hon. Donald E. Williams, Senate President Pro Tempore
Hon. Martin M. Looney, Senate Majority Leader
Adrienne Esposito, CCE Executive Director