

November 30, 2016

VIA ELECTRONIC MAIL

Andrew McKeon, Executive Director
RGGI, Inc.
90 Church Street, 4th Floor
New York, NY 10007
info@rggi.org

RE: RGGI 2016 Program Review: Role of Bioenergy

FROM: Acadia Center, Arise for Social Justice in Springfield, Appalachian Mountain Club, Center for Biological Diversity, Chesapeake Climate Action Network, Clean Air Task Force, Conservation Law Foundation, Environmental League of Massachusetts, Natural Resources Council of Maine, Physicians For Social Responsibility, Partnership For Policy Integrity, Sierra Club, Springfield Climate Justice Coalition, and Toxics Action Center.

Dear Mr. McKeon and Members of the RGGI Board:

Biomass power plants are responsible for generating a significant proportion of renewable energy in RGGI states. As noted in previous comment letters to RGGI, (Center for Biological Diversity, Clean Air Task Force, Partnership for Policy Integrity, February 19, 2016¹ and NRDC, March 15, 2016²), RGGI's non-inclusion of bioenergy carbon emissions in power sector modeling means actual emissions could be more than 40% higher in 2023 than projected by RGGI.³

A new analysis⁴ of power sector development under the Clean Power Plan (CPP) shows that counting bioenergy generation, but not emissions, increases bioenergy buildout and carbon pollution while undermining deployment of clean renewable energy. These findings further reinforce the need to evaluate the impact of bioenergy emissions in the RGGI program.

The CPP modeling was conducted by the Energy Information Administration (EIA) and evaluated by the Partnership for Policy Integrity. Using the National Energy Modeling System, which seeks the least-cost path to reducing power sector emissions, EIA contrasted two approaches for the CPP: one where bioenergy is classified as having zero emissions and generation from bioenergy increases alongside wind and solar; and one where bioenergy emissions are counted and the model projects bioenergy generation continuing at current levels with little additional buildout. Under the "carbon neutral" scenario, electricity generation from biomass more than triples and coal generation is slightly higher, compared to the scenario where bioenergy carbon pollution is counted.

Importantly, although bioenergy is often presumed to displace coal, the model finds that treating bioenergy as zero-emissions displaces solar power. Specifically, projected solar photovoltaic capacity is 21 percent higher when biomass carbon is counted than when bioenergy is classified as carbon neutral. Overall,

¹ Letter on RGGI modeling from Center for Biological Diversity, Clean Air Task Force, and Partnership for Policy Integrity, February 19, 2016. At <http://www.pfpi.net/wp-content/uploads/2016/03/CBD-CATF-PFPI-RGGI-comments-Feb-19-2016.pdf>

² Letter on RGGI modeling from Natural Resources Defense Council, March 15, 2016. At <http://www.pfpi.net/wp-content/uploads/2016/03/NRDC-RGGI-Biomass-Comments.pdf>

³ See footnote 1.

⁴ Partnership for Policy Integrity, October, 2016. Classifying biomass as carbon neutral increases greenhouse gas and air pollution emissions under the Clean Power Plan – A summary of Energy Information Administration projections. At <http://www.pfpi.net/wp-content/uploads/2016/10/EIA-biomass-effects-on-CPP-PFPI-Oct-2016.pdf>

cumulative carbon dioxide emissions by 2030 under the carbon neutral/high bioenergy scenario are more than 600 million tons higher than under the scenario where bioenergy carbon is counted.

RGGI is a model of a market-based solution that reduces power sector carbon pollution, creates jobs, and promotes energy efficiency and green technologies. The program may serve as a national template if carbon trading is expanded to more states under the Clean Power Plan, or as a critical backstop should some or all of the CPP not take effect. However, EIA's modeling shows that counting bioenergy generation, but not the associated carbon emissions, increases bioenergy buildout and overall power sector pollution while undermining deployment of truly clean renewable technologies like solar power. We therefore request that RGGI, like EIA, use modeling that fully accounts for the carbon emissions from bioenergy production in evaluating the effect of current and proposed bioenergy capacity on power sector emissions.

Signed,

Acadia Center
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Appalachian Mountain Club
Center for Biological Diversity
Chesapeake Climate Action Network
Clean Air Task Force
Conservation Law Foundation
Environmental League of Massachusetts
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