From:	Roberts, J. Timmons
To:	Info
Subject:	RGGI Program Review Comment
Date:	Tuesday, September 14, 2021 1:57:59 PM

Dear RGGI review team:

I'm social scientist working on climate policy and politics for 30 years. I consider RGGI an important tool in addressing climate change, but one whose potential has gone largely unrealized.

RGGI has shown that pricing carbon emissions can generate important revenue for efficiency and some renewables and electrification upgrades. Very good things have happened with RGGI revenues. It also has shown the rest of the country that carbon pricing need not wreck the economy.

Where RGGI has been less successful is in demonstrably driving emissions reductions due to the future costs of energy. Emissions have dropped in the region during RGGI's functioning. However much of the emissions reductions in the region were due to the shift from coal-fired electricity generation to natural gas. Some of these apparent reductions might disappear if methane leakage rates were better measured, or if nearer term global warming potentials of methane (20-year vs the current usual 100-year) were used. Since climate impacts are sharply increasing and must be handled in the next two decades, these shorter term efforts to compare methane and carbon dioxide are arguably more valid.

The problem is not with the design of RGGI but with the price. The auction prices of allowances under RGGI are simply far too low, a fraction of what has been estimated at the "social costs of carbon" and way too low to drive investments in major transformation that we know now is needed over the next 10-20 years. Auction 53 was the first time prices had exceeded $8.00 a ton; most estimates are that carbon prices should be at $40-50 a ton but need to be even higher to drive emissions reductions. At those levels they would generate much more revenues for investment in the rapid transition we need.

I'm happy to discuss these issues further, just let me know.

Sincerely,
Timmons Roberts

--
J. Timmons Roberts; On sabbatical, 2020-'21 academic year
Ittleson Professor of Environmental Studies and Sociology, Brown University
Director, the Climate and Development Lab
Institute at Brown for Environment and Society
Brown Department of Sociology
Executive Director, Climate Social Science Network
Visiting Research Fellow, Stockholm Environment Institute
On Twitter @timmonsroberts