

From: [Angelina Donhoff](#)
To: [Info](#)
Subject: RGGI Program Review Comment
Date: Wednesday, December 15, 2021 7:57:44 PM

Hello,

I just attended your program review meeting and several speakers requested input on various aspects of RGGI. Here is my input:

1. **Raise the CCR threshold by a large margin.** Currently the CCR is set to increase only 7% per year, and given the recent allowance price jump it is likely that the CCR will be triggered frequently from now on, polluting millions more tons of CO₂. The price to pollute should be free to continue to rise to an appropriate level for the damage it causes, without risk of blowing past the cap.
2. A couple speakers sought input on whether or not there should be leftover allowances. My input is that if this cap and trade program is designed correctly, the cap should be low enough that it is hit at every auction, thereby preventing emissions. There should not be leftover allowances.
3. Release the IPM projections for future allowance prices ASAP. In the meeting we were told that this data is always public, but when I looked in the [2017 Model Rule](#), there was no allowance price projection data.
4. Release more detailed data in your reinvestment report, breaking down exactly what energy and research projects are being funded.

Thank you very much,
Angelina