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## Acadia Center Comment on Proposed RGGI Regulations, Air Pollution Control Regulation No. 46, 'CO<sub>2</sub> Budget Trading Program', 250-RICR-120-05-46

To Whom It May Concern:

Acadia Center and partners write in strong support of the proposed amendments to the Regional Greenhouse Gas Initiative (RGGI) regulations, titled Air Pollution Control Regulation No. 46, 'CO<sub>2</sub> Budget Trading Program', also identified as 250-RICR-120-05-46. The undersigned organizations are grateful to the Department of Environmental Management for the opportunity to provide written comment at this juncture. In a time of immense federal uncertainty, Rhode Island and RGGI states should be applauded for bringing the [Third Program Review](#) to fruition and continuing to work together not only to reduce detrimental pollution that harms public health, but also to enhance the program's ability to keep delivering tangible energy bill reductions to consumers and the public. It is now essential that Rhode Island and other participating states act in unison to extend and renew their participation in the program, so we commend the timely advancement of the proposed regulation and this opportunity for public comment.

[Acadia Center](#) is a non-profit organization with over 25 years of experience dedicated to advancing transformative clean energy solutions that promote a livable climate and a more equitable economy at the state, regional and community levels primarily in the northeastern U.S. and eastern Canada. Through rigorous data analysis and strategic partnerships, Acadia Center advocates for policies that significantly reduce carbon emissions and address systemic energy challenges. By collaborating with stakeholders, government, business, and communities, Acadia Center pursues ambitious but pragmatic strategies that help to ensure an inclusive and sustainable energy future for all.

### Model of Multi-State Collaboration

RGGI has proven the power of multi-state collaboration to reduce power-sector emissions while delivering net economic and consumer benefits. As a longstanding program with durable bipartisan support, RGGI has withstood the test of time and promises to continue delivering benefits to participating states for the next decade and beyond. To cite an excerpt from the [RGGI program review announcement](#) on the success of RGGI:

*“Since RGGI’s inception, CO2 emissions from covered power plants in the region have declined 46% and RGGI allowance auctions have yielded more than \$9 billion to power investment in the clean energy future of the participating states. RGGI states’ investments of auction proceeds to date, have directly benefited over 8 million households and 400,000 businesses in the region, and will save ratepayers over \$20 billion on their energy bills through energy efficiency programs and other consumer support.”*

As demonstrated in Rhode Island’s [RGGI Investments Dashboard](#), from the beginning of RGGI (2009) to today, in Rhode Island alone:

- \$79.4 million of RGGI proceeds have been invested across residential, commercial, and municipal, state, and community recipients, as well as for direct low-income rate relief (with over \$10 million has been invested in low-income rate relief).
- The program has delivered \$377.7 million in lifetime energy bill savings and over 1 million tons of avoided lifetime CO2 emissions.
- The program has directly benefited 78,059 participating households and 1,332 participating businesses, while bringing indirect and induced benefits to all who make their home and do business in Rhode Island

### Rhode Island Advances Next Phase of RGGI, through 2037

This rulemaking action is in alignment with the finalization of the [RGGI Third Program Review](#), with updates aimed at reinforcing the region’s power sector transition and related climate and energy affordability goals. The adoption of these updates by Rhode Island in regulation is necessary for implementation of the RGGI program changes outlined in the Third Program Review. They represent a meaningful step forward in strengthening the program and advancing the region’s clean air and affordable energy goals through 2037.

These updates include several important changes to strengthen and future-proof the RGGI program for consumer and community benefits, including: a strengthened emissions cap trajectory through 2037, new market mechanisms, and the removal of offsets for program compliance. Most notably, **we applaud Rhode Island’s adoption of a strengthened emissions cap trajectory through 2037**, which sets Rhode Island on a path to achieve meaningful emission reductions in a timely manner. Market mechanisms (updated cost containment reserve, increased minimum reserve price) aim to maintain affordable electricity prices and allowance availability for necessary emissions. Rhode Island has already been a leader in not accepting offset applications as a result of the Second Program Review in 2017.

The undersigned organizations also appreciate Rhode Island’s commitment to begin the Fourth Program Review no later than 2028, as part of the state’s ongoing commitment to evaluate and adjust the program as needed to ensure its continued success.

### Recommendations

Finally, in alignment with the commitment of RGGI and RGGI states to seek continual improvement, the undersigned organizations encourage Rhode Island to revisit [Acadia Center’s Findings and Recommendations for the Third Program Review](#), along with the more recent [RGGI Funds in Action: Insights into the Allocation of RGGI Proceeds](#) report. Rhode Island has the opportunity to lead by incorporating recommendations not otherwise addressed by all states in the Third Program Review.

For example, Rhode Island can demonstrate leadership by:

- Ensuring that environmental justice (EJ) (and economically disadvantaged) communities directly benefit from RGGI proceeds, through commitments that:
  - No less than 40-50% of RGGI proceeds are invested in EJ communities
  - Ensure meaningful participation in investment decisions by EJ community members
  - Transparently track and report expenditures and impact
- Doing more to improve localized air quality
  - Ensuring active air quality monitoring sites within a 3-mile radius to measure the impact on neighboring communities
  - Stepping up enforcement of air quality monitoring, especially for EJ communities and areas with disproportionately high incidence of asthma located within 3 miles of a RGGI plant.
- Offering transparency and public access of emission reporting, in addition to proceed distribution

## Conclusion

Thank you again for advancing this proposed amendment and ensuring that one of Rhode Island's most successful tools to ensure energy affordability and independence continues to thrive over the coming decade. Please do not hesitate to reach out with any questions or for more information.

Sincerely,  
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