



**Acadia
Center**

Advancing the Clean Energy Future

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May 24, 2024

Danielle Jameson
Rhode Island Office of Energy Resources (OER)
1 Capitol Hill
Providence, RI 02908

RE: 2024-A Plan for the Allocation and Distribution of RGGI Auction Proceeds

To Whom It May Concern:

Acadia Center appreciates the opportunity to provide written comments on the proposed 2024-A Plan for the Allocation and Distribution of Regional Greenhouse Gas Initiative (RGGI) Proceeds. We also acknowledge and appreciate your responsiveness in this allocation to Acadia Center's comments submitted on January 25, 2024, including the provision of a table with percentage allocation, program classification, and investment category, as well as the allocation of RGGI funding which we believe may be directed to substantial remediation of pre-weatherization barriers, in coordination with the federal Home Efficiency Rebate (HER) and/or Home Electrification and Appliance Rebate (HEAR) Programs.

Annual Impact Reporting

R.I. Gen. Laws § 23-82-6 (d) on the Implementation of the Regional Greenhouse Gas Initiative Act directs that the Office of Energy Resources (OER) shall prepare a report annually describing the implementation and operation of RGGI in Rhode Island, which shall be made public and be posted to OER's website and also submitted to the general assembly. As previously noted, there has been an absence of annual reports and a lack of transparency regarding allocation portions that remain unspent, are reallocated, or rolled over between auctions. Annual reports enable stakeholders to better assess the distribution, evolution, and ultimately, impact of RGGI program allocations actually spent throughout the year. The impact of each year's program allocations may then be compared to previous years as well as other state programs, and may inform future allocations.

Equitable Distribution

Acadia Center urges OER to ensure RGGI investments are distributed equitably throughout Rhode Island's communities—particularly those most impacted by the effects of air and climate pollution. OER and partner agencies must make a commitment and report on their efforts to follow the federal Justice40 Initiative to direct at least 40 percent of overall RGGI investment benefits to disadvantaged communities that are marginalized, underserved, and overburdened by pollution. While Acadia Center can estimate that this allocation plan is probably directing around 40% of the proceeds to underserved communities and schools, we recommend that this percentage and the specific populations benefiting be clearly stated in the allocation plan or in an annual report.

The geospatial [Climate and Economic Justice Screening Tool \(CEJST\)](#) was developed alongside Justice40 guidance to assist agencies in defining and identifying disadvantaged communities. Acadia Center recommends collecting geo-referenced data, at the census or municipality level at a minimum, from projects administered with RGGI funds, in

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order to track the geographic distribution of impact. The federal HER and HEAR programs are being developed to align with the Justice 40 initiative; we would like to see the same commitment for Rhode Island's RGGI allocations, both in supplementing these federal programs and supporting a wide range of other state programs.

Lead By Example

Recent RGGI allocations have seen a significant portion of funds allocated to the state's Lead by Example (LBE) efforts, including energy efficiency and renewable energy projects at state agencies, municipalities and schools, and broadly supporting projects under [Executive Order 2023-06](#). While OER's annual LBE Awards recognizes exemplary projects by state agencies, municipal governments, quasi-public agencies, and public schools, there has not been a coordinated effort to report on and communicate the state's overall progress in implementing [EO 2023-06](#) and [EO 2015-17](#), and helping to achieve the state's Act on Climate targets.¹ To what extent have RGGI investments advanced the efforts of public sector entities to reduce their operating and maintenance costs and cut greenhouse gas emissions? Acadia Center would like to see more coordinated updates on the state's progress in implementing its LBE commitments, and to better understand the impact of RGGI investments on that progress.

Thank you for your consideration of these comments.

Sincerely,

Emily Koo
Senior Policy Advocate and Rhode Island Program Director
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Commented [EK2]: Same as language of January 2024 letter

¹ The most [recent LBE annual report](#) available is for 2020, which provides the status of targets in [EO 2015-17](#).