February 8, 2008

Michele Totten
Department of Environmental Protection
Bureau of Air Management
79 Elm Street
Hartford, Connecticut 06106-5127

Via e-mail: Michele.Totten@po.state.ct.us

RE: ***Comments of the Renewable Energy Marketer's Association on Connecticut's Proposed Regional Greenhouse Gas Initiative Regulations***

Dear Ms. Totten:

The Renewable Energy Marketers Association ("REMA") appreciates the opportunity to comment on the proposed Control of Carbon Dioxide Emissions (Section 22a-171-31) regulations to implement the Regional Greenhouse Gas Initiative ("RGGI") in Connecticut.

REMA represents the collective interests of for-profit and nonprofit organizations that sell or promote renewable energy products through voluntary markets. These products include renewable electricity and renewable energy certificates (RECs), which are offered to individuals, companies, and institutions throughout North America. As our name suggests, the Renewable Energy Marketers Association is a trade association of interested entities involved in the creation, supply, purchase, sale, advocacy, and education about renewable energy and RECs.

Our comments our limited to the provisions concerning the voluntary renewable energy (VRE) set-aside

We thank and commend Connecticut for recognizing the value of voluntary renewable energy purchases by creating a voluntary renewable energy set-aside. We recommend that Connecticut adopt an un-capped VRE set-aside. Capping the set-aside potentially artificially limits the market for voluntary renewable energy purchases, since voluntary customers are purchasing renewable energy, in large part, to offset their contribution to climate change. If voluntary customers come to understand that their purchase may not reduce greenhouse gas emissions they will be less likely to participate in the voluntary market. Retiring allowances annually based on the actual contribution of voluntary renewable energy purchases towards reducing carbon dioxide is the best method to ensure the continued growth of the voluntary market in Connecticut.

REMA has the following specific comments on sections of the regulations applying to the VRE set-aside:

(1) The regulations state that voluntary renewable energy sales from Class I sources anywhere in RGGI would qualify. We presume that these purchases must come from sources that would qualify for Connecticut's Class I RPS. If this is the intention we recommend clarifying this, since Class I RPS resources differ among RGGI states.

(2) Per paragraph (B), should Connecticut proceed with a capped set-aside, how does it plan to address voluntary renewable energy purchases that would have resulted in allowance reductions greater than the VRE set-aside? Which renewable energy sales receive credit for allowance retirements is important to marketers' claims regarding carbon dioxide reductions. This problem is best addressed, as we have noted, by having an uncapped VRE set-aside.

Thank you for considering these comments as you finalize Connecticut's RGGI rules. If you have any questions regarding these comments please contact Eric Thumma at 484-654-1887 or by e-mail at ethumma@iberdrolausa.com.

The views expressed by REMA in this regulatory filing do not necessarily represent the views of each individual member company.