



Role of State/Local Agencies in National Greenhouse Gas Program: Report from February 2008 NACAA Conference

NACAA Spring Membership Meeting Tampa, Florida

> May 5, 2008 Presented by Chris James



Conference Overview

- Groundwork: NACAA 5/07 adopted greenhouse gas (GHG) principles
- Multiple GHG bills indicator of pace and depth of action
- Regional, state, local efforts informing debate. More input desired by Congress.
- ~30 states and dozens of local agencies have completed comprehensive GHG plans



Conference Themes

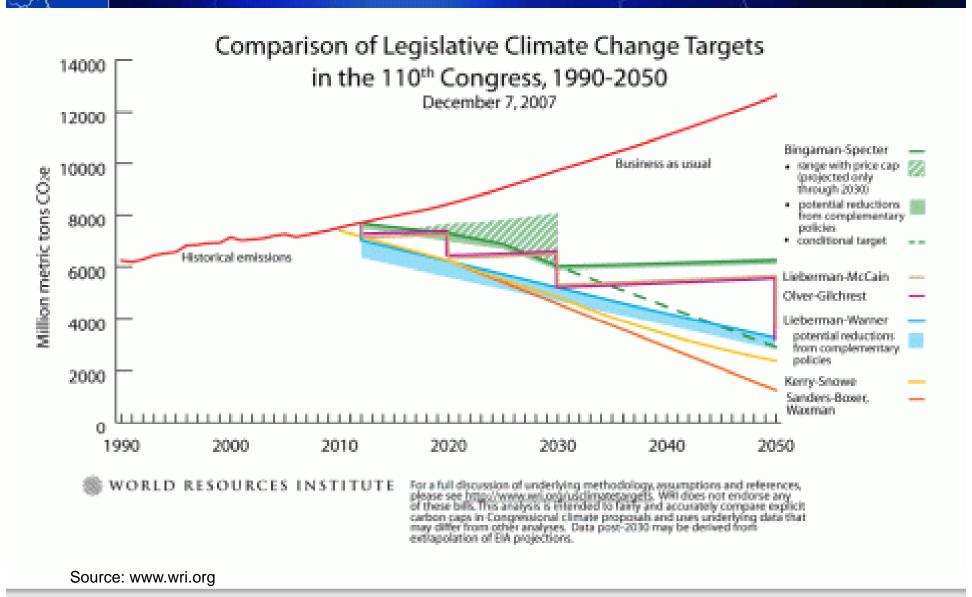
- Opening panel: House and Senate staff
- Followed by four discussion sessions, organized around role of state/local agencies:
 - Program design
 - Implementation
 - Allowance allocation and funding
 - Data management



Messages from Conference Attendees

- GHG reduction goals will not be met without state and local contributions
 - Energy efficiency: cost effective, cumulative benefits
 - Local agencies: land use and transportation planning
- States: "first among equals" need significant portion of allowances to ensure that reduction goals are met cost-effectively and timely
- Link funding to plans and performance
- Support state efforts to go faster and farther
- Federal: set standards: building codes, appliances, measurement protocols

GHG Reduction Targets from Various Congressional Bills





- Federal program: preserve right of S/L to go further than Federal minimum
- Support efforts of S/L to do so
- S/L programs essential to developing successful national GHG program
- Frame pre-emption in terms of:
 - States are more nimble than Federal
 - Reductions can be achieved more cost-effectively
 - Focus: significant GHG contributors in that state
 - Global warming ≠ same impacts (local and regional differences, and differences in GHG contributors)



Federal support for State and Local Programs

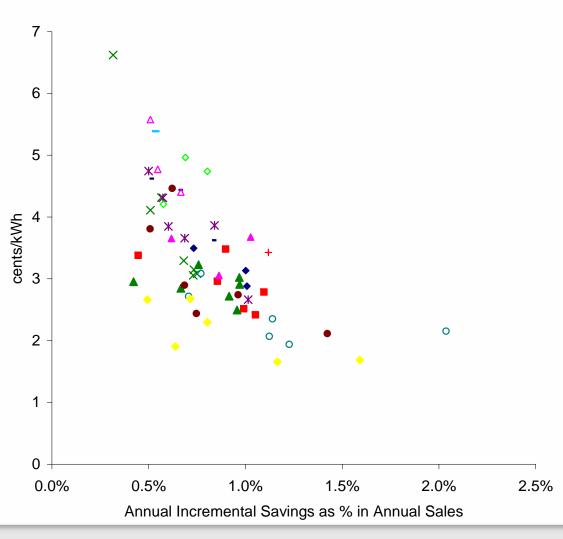
- Significant interest in hybrid approach: cap and trade for some sectors, standards for others
- Establish minimum appliance and building standards
 - Achieve reductions w/o requiring additional regulation or financial incentives
- Set example: require DOT, DOE, EPA, et al to integrate GHG into planning
- Uniform carbon prices
- Facilitate revenue recycling so cap and trade funds actually reduce emissions
 - Guidance to states critical



State and Local Programs Critical to Success

- Energy efficiency ("first fuel": see example on next slide), RPS, transportation measures
- Consensus: <u>increase</u> state/local allowance pool (30-50% suggested v. 10%)
- Flexibility in: allocation, use of funds
- Reward S/Ls for superior performance

Utility Cost of DSM vs. Annual Savings as % of Annual Sales

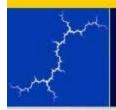


- CT IOUs 2000-2005
- MA IOUs 2003-2005
- ▲ Efficiency Vermont 2000-2006
- × SMUD 2000-2006
- * Seattle 2000-2005
- PG&E 2000-2005
- o SDG&E 2000-2005
- SCE 2000-2005
- Mass. Electric 2000-2002
- W. Mass. Electric 2000-2002
- △ Boston Ed/Nstar 2000-2002
- + Cambr. Elec. 2000
- Com. Elec. 2000
- Fithb. G&E 2000-2002

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Implementation

- Identify what Federal and State each do well
 - Federal: set standards, monitoring and verification, market monitoring
 - State: planning, permit, compliance, education, flexibility to target incentives to achieve most success
- Use respective strengths to complement program success
- Broaden and deepen skills
- Air only or environmental only focus too narrow
- Federal: outline how GHG fits or doesn't within CAAA (don't create a parallel process to criteria program)



Examples of State/Local Roles

- Accept some level of delegation. S/L know sources best
- Multi-agency coordination
- Integrated and local approaches
- Education and outreach
- Adaptation and mitigation planning
- Allowance and revenue functions



Requirement for State "Plans"

- Broad scope, beyond electric sector
- Link \$\$ to development of plan
- Provide \$\$\$ to go beyond minimum



Allocation and Funding

- Cap and trade: establish framework for sustained reductions. Demonstrate US leadership
- Apportion allowances: enable cost effective reductions to occur at S/L. (energy efficiency << \$\$ than cost of new generation)
- Set overall budgets: allow states flexibility in allocation

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S/L: Auction Allowances

- Move to 100% auction of allowances as quickly as possible
- Note: not all states have thought about auctions
- Direct high % of <u>allowances</u> to S/L
 - RGGI model (state decision)
 - Use some \$ for program administration
 - Less support for Federal auction with the proceeds (\$) going to S/L (tobacco settlement caveat)



- Practical application focus
- National registry already exists
- Allow state and local registry
 - Sources below threshold or source categories not covered by national program



Promote Consistency in Data Management

- Consistent reporting requirements
- Centralized reporting system
- One process for S/L and EPA
- Same protocols
- Same data quality requirements



State/Local and Federal Roles in Data

- State/Local: resources for data QA/QC, data needs more granular than that of Fed, need top-down and bottom-up for planning
- Federal: develop/ensure common protocols and emission factors



Apply GHG Data Principles More Broadly

- These points did not arise in all groups, but showed level of thinking re: existing core programs:
- 3rd party M&V is important for GHG, why not for criteria pollutants?
- Past CAA decision driven by inventories, maybe time to revise inventories
- Now is the time to collaborate



Actions State and Local Agencies Can Do Now

- Continue to show leadership
 - More actions, additional state climate plans will continue to drive national discussion and legislation
- Initiate discussions w/ public, elected officials, other agencies
- Prepare the workforce
- Expand on traditional efforts



Questions?

For further information see also:

www.synapse-energy.com

Cjames@synapse-energy.com

617 861 7684

Thank You!