



February 28, 2020

TCI Draft MOU Comments

PowerOptions fully supports the TCI draft MOU to establish a regional cap-and-invest program to reduce carbon dioxide (“CO₂”) emissions from transportation, and to invest proceeds from the program in measures designed to further reduce CO₂ emissions and provide incentives for low-carbon and more resilient transportation.

PowerOptions is the largest energy-buying consortium in New England, with more than 450 non-profits and public entity members across Massachusetts, Connecticut and Rhode Island. Our members use 1 billion kWh of electricity and 10 million dekatherms of natural gas annually and include hospitals and healthcare systems, colleges and universities, community and human service agencies, K-12 public and private schools, museums, as well as municipalities and housing authorities. In addition to our core business of electricity and natural gas supply, we are at the forefront of working with our Members to implement cost-effective clean energy initiatives. Our additional program offerings include: a solar-plus storage program, with more than 70 MWs of solar developed or underway; a newly launched electric vehicle charging station program with more than 10 stations installed with our Members; and access to energy efficiency services and incentives in partnership with our local utilities while offering opportunities for on-bill financing through our electricity supply program. Recently, we have also begun current discussions with numerous Members about programs for clean transportation.

Our Members cross the TCI Region include more than 140 municipal entities and 44 colleges and universities, many who are adopting goals for zero emissions. A regional transportation cap-and invest program will be instrumental in supporting their efforts to meet these goals as well as contribute to the Region’s efforts to reduce transportation emissions. Our most important comment and recommendation is that the TCI program should look to create stable investments and incentives over long durations that Members can rely on. Without such, as happens in other clean energy programs, investment by our Members in clean transportation to meet their emissions reduction goals becomes challenging.

The TCI program takes the best of the successful Regional Greenhouse Gas Initiative and applies it to transportation. Over the past 10 years, RGGI has been instrumental in cutting power plant carbon emissions in half across the Northeast while growing the region’s economy and creating jobs. According to a [report](#)¹ published by RGGI, Inc. in October 2019, RGGI investments in 2017 are estimated to return \$1.4 billion in lifetime energy bill savings to nearly 300,000 households and 3,000 businesses that participated in programs funded by RGGI proceeds, and to more than 100,000 households that received direct bill

¹ https://www.rggi.org/sites/default/files/Uploads/Proceeds/RGGI_Proceeds_Report_2017.pdf



assistance. By pulling together a potentially even larger group of states than RGGI, TCI can be even more powerful in providing significant reductions in our most carbon-intensive sector, transportation, while providing investment in clean transportation infrastructure across our region. The opportunity to tap into these investments will be critical to our Members in reducing their transportation emissions and reaching their clean energy and climate goals, thereby multiplying the reductions set by the TCI program. PowerOptions looks forward to following the developments of TCI and the opportunities for our Members to contribute to the Regions reduction of transportation emissions.

Respectfully,

A handwritten signature in blue ink, appearing to read "Heather Takle".

Heather Takle
President & CEO
PowerOptions