



Members of the Air Pollution Control Board  
c/o Michael Rolband, Director  
Virginia Department of Environmental Quality  
1111 East Main Street, Suite 1400  
Richmond, VA 23218

March 2, 2023

I am writing today on behalf of the Virginia Energy Efficiency Council to once again urge the Virginia Air Board to reject attempts to remove Virginia from the Regional Greenhouse Gas Initiative (RGGI)- a multi-state initiative to reduce carbon pollution- through regulatory action. Especially since the board does not have the authority to do so.

Founded in 2012, VAEEC is a nonprofit organization, headquartered in Richmond, whose goal is to facilitate discussions and share resources to advance energy efficiency throughout the Commonwealth. We engage our members to identify barriers to and opportunities for energy efficiency advancement, and to develop a strong, fact-based, and balanced industry voice before local, state, and national policymakers and regulators. Our diverse group of over 100 members includes Fortune 500 companies, nonprofits, local governments, state agencies, and more whose vision is for energy efficiency to be an integral part of Virginia's economy and clean energy future.

In Virginia, RGGI provides unprecedented and irreplaceable funding for energy efficiency improvements in low-income housing. Virginia is the only RGGI state that dedicates fifty percent of its carbon-trading funds to make both new and existing low-income housing more energy-efficient. This funding stream has resulted in \$125M annually for weatherization providers and affordable housing developers to provide safe, affordable and energy-efficient homes to low-income families like never before.

In addition to my comments submitted during the prior comment period, I also wanted to address some of the statements made by Acting Secretary of Natural and Historic Resources, Travis Voyles at the last Air Board meeting on December 7, 2022. During that presentation, Acting Secretary Voyles stated that RGGI funds don't actually help anyone. This assertion is completely false, as shown by the data from a recent report from the VCU Wilder School:

- If Virginia continues to participate in the RGGI program through 2030, the estimated **total revenue** over the decade (2021-2030) will be in the range of **\$2.5 - \$3.3 Billion**, resulting in between \$125 - \$165 million per year for low-income energy efficiency programs.
- These RGGI funds could provide energy efficiency upgrades to up to **130,000 homes**, leading to over 590,000 MWh in annual electricity reductions and \$89 million in annual customer bill savings, **for an average of \$676 in annual energy savings per household.**

- For every dollar spent from the RGGI energy efficiency fund, \$1.66 would be generated in **economic benefits to the local economy**.
- The expenditure of these RGGI energy efficiency funds would have a **statewide economic impact of between \$2.03 billion and \$2.67 Billion** over the course of the decade (2021-2030), including up to \$1.75 billion in Value Added, and would create and sustain up to 2,115 new jobs.

Acting Secretary Voyles, and other administration officials have also suggested that other funding sources could be found to replace RGGI funds, however, that has not come to fruition. During the 2023 General Assembly session, which just recently adjourned, no additional funding for low-income energy efficiency programs was included in the Governor's amended budget, nor requested by any member of the General Assembly. Instead, the Governor's budget included a deduction from these energy efficiency funds for flooding recovery.

Additionally, the estimated \$125M annual revenue from RGGI for energy efficiency programs far exceeds the total funding otherwise available via existing state, federal, and utility programs. The authors of the VCU report estimated that all other low-income energy efficiency programs in Virginia provide less than \$55M annually combined. In other words, RGGI energy efficiency funds provide **more than double** what all other programs in the state offer to help low-income Virginians make their homes more safe, comfortable, and energy-efficient.

RGGI funding has been a game-changer for the most vulnerable in our communities, as well as for the nonprofits that provide them with safe, affordable, and energy-efficient housing. Virginians can't afford to have these programs disappear, which is why we ask members of the air board to embrace, not eliminate, the positive results from the commonwealth's participation in RGGI.

Respectfully,

Chelsea Harnish  
Executive Director  
Virginia Energy Efficiency Council