



HEARING OFFICER REPORT

**Prepared Pursuant to Section 4-168(a) of the
Connecticut General Statutes and
Section 22a-3a-3(d)(5) of the Department of Environmental Protection
Rules of Practice**

**Regarding
Amending Section 22a-174-31 and Repealing Section 22a-174-31a
of the Regulations of Connecticut State Agencies**

Hearing Officer: Bruce Ho

Hearing Date: July 23, 2026

On July 2, 2026, the current Acting Commissioner of the Department of Energy and Environmental Protection (the Commissioner and DEEP or Department, respectively) published a [notice of intent](#) to amend Section 22a-174-31 and to repeal Section 22a-174-31a of the Regulations of Connecticut State Agencies (RCSA). Pursuant to such notice, a [public hearing](#) was scheduled for July 23, 2026. The comment period ran until August 3, 2026.

I. Hearing Report Content

As required by Section 4-168(d) of the Connecticut General Statutes (CGS), this report describes the proposal, identifies the principal reasons in support of and in opposition to the proposal, and summarizes and responds to all comments on the proposal.

II. Summary of Proposal

The purpose of this proposal is to adopt conforming amendments to the Department's existing Regional Greenhouse Gas Initiative (RGGI) regulations to implement a July 2025 agreement between Connecticut and the other RGGI participating states. In 2007, the Legislature required that DEEP adopt regulations to implement RGGI in Connecticut. *See* Section 93 of Public Act 07-242 (codified as [CGS Section 22a-200c](#)). DEEP adopted those regulations in 2008, amended them in 2013, and updated them most recently in 2019. The July 2025 agreement updates the underlying RGGI Model Rule, and the state now needs to update its regulations, as do the other RGGI participating states.

The proposed updated regulations, which as currently drafted would take effect on January 1, 2027, are required for Connecticut to continue to participate in and receive tens of millions of dollars in

annual proceeds from RGGI, which Connecticut uses to benefit ratepayers, including through investments in energy efficiency and to provide electric rate reductions. The updated regulations also are required to stay in compliance with the legislative mandate in CGS Section 22a-200c(a) to adopt regulations implementing RGGI.

Description

RGGI is an initiative between Connecticut, Delaware, Maine, Maryland, Massachusetts, New Hampshire, New Jersey, New York, Rhode Island, Vermont, and Virginia to reduce carbon dioxide (CO₂) emissions from the power sector. Since 2008, the Department has implemented RGGI in Connecticut through regulations adopted in accordance with CGS Section 22a-200c(a), which requires: “The Commissioner of Energy and Environmental Protection shall adopt regulations, in accordance with chapter 54, to implement the Regional Greenhouse Gas Initiative.” Those regulations are based on a RGGI Model Rule developed through a cooperative effort of the participating states; that Model Rule has been updated about every half decade, as now.

Under RGGI, fossil fuel generators 25 megawatts and larger are required to purchase CO₂ “allowances,” each representing one ton of CO₂, to account for their emissions. Allowances are sold at quarterly auctions by Connecticut and the other RGGI states. The number of allowances made available each year, known as the annual CO₂ allowance “budget” or “cap,” declines over time, requiring power plants in the region to reduce their emissions over time. RGGI’s allowance auctions generate funds, which per CGS Section 22a-200c and DEEP’s implementing regulations are used to provide electric rate relief to consumers, support energy efficiency, clean energy, and clean transportation programs, and cover the costs of administering the program.

As of the September 2026 RGGI allowance auction,¹ since 2008, RGGI has generated over \$178 million to provide electric rate relief via the Public Utilities Regulatory Authority (PURA) in Connecticut; \$338 million to support energy efficiency; and over \$100 million for clean energy investments through the Connecticut Green Bank and clean vehicle rebates through the Connecticut Hydrogen and Electric Automobile Purchase Rebate (CHEAPR) program.

DEEP coordinates Connecticut’s RGGI program with corresponding regulations adopted in the other RGGI participating states. CO₂ allowances issued by Connecticut and the other states are “fungible”—i.e., they can be used for compliance by fossil fuel generators anywhere in the region. For example, a Connecticut power plant owner may use an allowance issued by New York or Massachusetts. By coordinating Connecticut’s RGGI program with programs adopted in the other states, Connecticut creates a larger, more efficient allowance market and achieves greater CO₂ emission reductions overall, regionwide, compared to the state acting alone. This market approach allows for the reduction of CO₂ emissions at the lowest possible cost, further enabling greater program benefits and ambition.

As part of RGGI, the participating states conduct regular regional program reviews to consider updates to ensure the continued success of the initiative, update the Model Rule as necessary, and then amend each state’s regulations accordingly. As noted, Connecticut has updated its regulations two times already. DEEP last amended its RGGI regulations, following Legislative Regulation Review Committee (LRRRC) approval, in 2019 to implement updates agreed to by the participating

¹ RGGI auction results are available at <https://www.rggi.org/auctions/auction-results>.

states in 2017. An earlier review, completed in 2013, also resulted in updates that DEEP adopted and implemented, following LRRC approval. RGGI requires state participants to adopt these agreed upon updates to preserve the fungibility of the allowances in the region.

The conforming amendments to Connecticut's RGGI regulations proposed here would implement the consensus updates that RGGI participating states agreed to in July 2025. These updates would modernize a few sections in RCSA Section 22a-174-31 and would repeal RCSA Section 22a-174-31a entirely. These regulatory updates are required for Connecticut to continue to participate in RGGI and to receive its benefits, including RGGI-funded ratepayer relief, energy efficiency, and other clean energy investments. In other words, if the regulations are not adopted, Connecticut will stop receiving tens of millions of dollars a year. The other RGGI participating states are likewise updating or already have updated their state regulations in accordance with the July 2025 agreement.

The conforming regulatory amendments will:

- **Require additional CO₂ emission reductions from covered fossil fuel-fired power plants between 2027 and 2037.** The RGGI cap will be reduced through 2037, then remain constant at the 2037 level in future years. By 2037, the cap will be reduced by between 61 and 90 percent below the 2026 base cap level in Connecticut's current rules. The level of reduction will be a function of the Cost Containment Reserve described in the next bullet.
- **Expand ratepayer protections.** The updated regulations include an expanded Cost Containment Reserve (CCR) that will automatically reduce the level of CO₂ emission reductions required (i.e., will increase the cap) if needed to keep allowance prices lower. The CCR releases additional allowances to the market if prices exceed a predefined threshold in RGGI's quarterly auctions, thereby relaxing the emission reduction requirement and putting downward pressure on prices. RGGI's existing CCR has helped ensure lower prices through the release of such allowances in response to market conditions. The conforming updates will expand RGGI's CCR by increasing the number of allowances that can be released in future years. If all CCR allowances are released, Connecticut's RGGI cap reduction would decrease from 90 to 61 percent by 2037, from Connecticut's 2026 base cap level.
- **Eliminate two allowance "set aside" accounts** previously established under RCSA Section 22a-174-31. The Combined Heat and Power (CHP) Useful Thermal Energy Set-aside Account will be removed and replaced with a limited exemption from RGGI for CHP units in Connecticut. The Voluntary Clean Energy Purchase Set-aside Account, a component of the state's RGGI program that has gone mostly unused in recent years, will be removed.
- **Remove the Emissions Containment Reserve (ECR)** previously established under RCSA Section 22a-174-31. The ECR is a mechanism that can lower the number of allowances made available if allowance prices at auction fall below a threshold price. This mechanism has never been triggered and is not expected to be triggered in the future. Therefore, the proposal eliminates the ECR in the interest of a more streamlined regulation.

- **Eliminate provisions related to the award of new CO₂ emission offset allowances.** This proposal would repeal RCSA Section 22a-174-31a, which establishes requirements for CO₂ emission offset projects under RGGI that may be proposed for approval by DEEP, and it would remove corresponding provisions in RCSA Section 22a-174-31. No offset projects have been proposed in Connecticut for DEEP's approval since RCSA Section 22a-174-31a was adopted in 2008. RGGI offset projects have similarly played minimal to no roles in the other states participating in RGGI. Any offset allowances awarded prior to January 1, 2027, could still be used for compliance in Connecticut, subject to existing limits on their use in RCSA Section 22a-174-31.
- **Remove expired and other outdated provisions** that will no longer have regulatory effect by the time the updated regulations take effect in 2027.

These amendments will ensure the continued availability of RGGI proceeds to support programs that benefit Connecticut consumers. The amendments will not change Connecticut's allocation of RGGI proceeds. Under the updated regulations, Connecticut will continue to invest proceeds from RGGI's quarterly CO₂ allowance auctions in programs that reduce bills, including rate relief and energy efficiency.

Because all of Connecticut's state neighbors participate in RGGI, ISO New England regional wholesale energy markets will continue to reflect emitting generators' RGGI compliance costs whether the state participates directly in RGGI or not. Updating Connecticut's regulations, as DEEP proposes, to enable the state to continue participating in RGGI, however, is required for the state to continue to receive tens of millions of dollars in annual proceeds from the initiative that the state uses to offset these wholesale market costs and provide affordability benefits to ratepayers. In other words, if Connecticut fails to adopt these regulations, ratepayers will continue to pay wholesale market costs associated with RGGI but will no longer receive benefits from Connecticut's investments of RGGI proceeds.

III. Summary of Opposition/Support of Proposal

DEEP received 150 comments on this proposal, including oral comments at the hearing and written comments sent to the DEEP Energy Bureau email address or through the Secretary of State eRegulations system. The comments received, which are posted in eRegulations under [Tracking Number PR2025-028](#), covered a wide variety of topics as summarized below.

Over 90 percent of comments supported the proposal. Principal reasons in support included:

- Consistency with Connecticut's statutory requirement that DEEP adopt regulations to implement RGGI in the state.
- Public health benefits to Connecticut from RGGI resulting from air pollution reductions.
- Economic benefits to Connecticut from RGGI, including job growth and support for continued development and growth of the state's clean energy economy.
- Ensuring Connecticut continues to receive tens of millions of dollars in annual RGGI allowance proceeds to provide rate relief and support energy efficiency, clean energy, and clean transportation investments that benefit Connecticut households and businesses.

- Harms to Connecticut if the state does not adopt the proposal, as Connecticut ratepayers would continue to pay for costs of RGGI compliance in the regional electricity market but would no longer receive the benefits of RGGI proceeds used to offset those costs.
- Benefits to both ratepayers and power generators from the expanded Cost Containment Reserve (CCR) included in the proposal, which will increase ratepayer protections as well as compliance flexibility for power generators.
- The need to reduce greenhouse gas emissions to address climate change and for Connecticut to lead in this area in the absence of federal action.
- Consistency with RGGI's regional emission reduction trajectory and other elements of the RGGI Model Rule.
- Support for specific provisions, including the proposed limited exemption for combined heat and power facilities, expansion of the CCR, and the elimination of certain set-aside accounts, the ECR, and other outdated provisions to reduce administrative complexity.

Principal opposition to or concerns with the proposal can be sorted into the following categories:

- Concerns about the current cost impacts of RGGI and the possibility the proposal could increase cost impacts.
- Questions about the efficacy of RGGI in reducing emissions, incentivizing clean energy, and/or generating funding for clean energy investments.
- General opposition to carbon credit policies.
- Concerns about renewable energy supply chains, siting, and/or costs.
- Concerns about RGGI's impact on energy production.
- Questions about assumptions used in and the results of technical modeling and analyses cited in the accompanying regulatory documents to the proposal.
- Questions about public participation, transparency, and/or the role of the legislature in reviewing and approving the proposal.

In addition to expressions of support or opposition, several comments recommended other changes to Connecticut's RGGI regulations or implementation, including alternative uses of allowance proceeds, or to other state policies, as summarized below.

IV. Summary of Comments

All commenters are identified in Appendix A - List of Commenters to PR2025-028. A summary of the comments and the Department's responses follows. Many commenters made similar or identical statements, and those comments are grouped by topic. Comments received from members of the Connecticut General Assembly, which included comments both supporting and raising concerns with the proposed regulations, are included in their own section.

Public Health and Environment

Comment 1. DEEP received many comments from individuals supporting Connecticut's continued participation in RGGI and the state's commitment to further reduce CO₂ emissions under the proposed regulations. Many comments cited the importance of RGGI's emission reduction and public health benefits, including RGGI's role in helping reduce CO₂ emissions from covered power plants in the region by 47 percent below 2005 levels and providing \$152 million to

\$364 million in health benefits to Connecticut from air pollution reductions during the initiative's first six years. Some commenters noted the importance of continuing to improve air quality in Connecticut and air pollution challenges in their communities, including Hartford and New Haven, and in environmental justice communities. Some commenters wrote about air pollution challenges faced by the commenter or a family member who has asthma. Multiple commenters cited health benefits from RGGI-related air pollution reductions, such as avoided healthcare costs, reduced strain on the healthcare system, increased school attendance, and improved quality of life. Multiple commenters expressed the importance of reducing fossil fuel use and emissions through RGGI to address impacts of climate change, including extreme weather and disasters, such as heatwaves, flooding, and fire smoke. Some commenters expressed a moral imperative to reduce emissions to protect future generations or to do the state's part in addressing global climate change. Multiple commenters stressed the importance of Connecticut acting to reduce emissions in the absence of federal climate action.

Response. DEEP thanks the commenters for their support of the proposed regulations. DEEP recognizes the health and climate impacts of combusting fossil fuels and the environmental and health benefits of reducing CO₂ emissions and other air pollutants from fossil fuel use. Studies have shown RGGI has helped reduce CO₂ and co-pollutant emissions from fossil fuel-fired power plants,² that air pollution reductions attributable to RGGI provide significant health benefits to Connecticut,³ and that the proposed regulations would lower RGGI's CO₂ emission cap, requiring additional CO₂ emission reductions. The state is committed to protecting the health of the public and the environment.

Comment 2. DEEP received comments from multiple organizations focused on environmental protection, conservation, clean energy, and/or environmental justice who support the state's continued participation in RGGI to mitigate climate change and protect health. These included supportive comments from the Connecticut League of Conservation Voters (CT LCV), Conservation Law Foundation (CLF), Environmental Defense Fund (EDF), Interreligious Eco-Justice Network (IEJN), Natural Resources Defense Council (NRDC), The Nature Conservancy (TNC), People's Action for Clean Energy (PACE), Save the Sound, and Sierra Club's Environmental Law Program. These comments raised many similar points to those summarized in Comment 1 above. Additionally, PACE noted RGGI has helped New England achieve one of the lowest electric sector greenhouse gas emission rates in the country. TNC commented that climate change is the greatest long-term threat to its conservation efforts. CLF and Sierra Club provided further details on health impacts from fossil fuel power plants, which contribute to nitrous oxide (NO_x), sulfur dioxide (SO₂), fine particulate, and ground-level ozone pollution that is associated with cardiovascular and respiratory illnesses such as heart attacks, asthma attacks, and bronchitis. CLF noted Connecticut has some of the worst air quality in the country. CLF and TNC commented

² See, e.g., Brian C. Murray and Peter T. Maniloff, [“Why have greenhouse emissions in RGGI states declined? An econometric attribution to economic, energy market, and policy factors.”](#) *Energy Economics* 51: 581-589 (2015); Abt Associates (2017), [Analysis of the Public Health Impacts of the Regional Greenhouse Gas Initiative, 2009–2014](#); Frederica Perera, David Cooley, Alique Berberian, David Mills, and Patrick Kinney, [“Co-Benefits to Children's Health of the U.S. Regional Greenhouse Gas Initiative.”](#) *Environmental Health Perspectives* 128(7): 77006 (2020).

³ Abt Associates (2017), [Analysis of the Public Health Impacts of the Regional Greenhouse Gas Initiative, 2009–2014: Appendix E: State Level Results](#); Frederica Perera, David Cooley, Alique Berberian, David Mills, and Patrick Kinney, [“Co-Benefits to Children's Health of the U.S. Regional Greenhouse Gas Initiative.”](#) *Environmental Health Perspectives* 128(7): 77006 (2020).

that children, older adults, pregnant women, people with preexisting health conditions, people living in low socioeconomic neighborhoods, and people in communities disproportionately exposed to pollution are particularly vulnerable to pollution harms. IEJN and TNC described a variety of climate impacts, including hotter summers, extreme storms, wildfires, and habitat and species loss.

Response. DEEP thanks the commenting organizations for their support of the proposed regulations. See also DEEP’s response to Comment 1 above.

Comment 3. One commenter opposed to the proposal stated that carbon credit tightening is not saving the environment and stated that the proposal is pushing questionable ideology.

Response. In April 2026, DEEP issued [Connecticut’s Climate Progress](#) report as directed by the state legislature. This report included the findings of the Intergovernmental Panel on Climate Change, the United States Global Change Research Program, and the National Academies of Science, Engineering, and Medicine—based on thousands of scientific studies over decades—that emissions of greenhouse gases, including CO₂, and other air pollutants from burning fossil fuels, including in power plants, are driving climate change, which is causing numerous harms, and damaging public health. As further reviewed in the April 2026 report, climate change harms to Connecticut include 20 inches of projected sea level rise by 2050 that will result in coastal flooding like that experienced in Superstorm Sandy every 5-10 years, increased likelihood of heavier rainfall amounts when storms occur that can cause stormwater and riverine flooding, a 5°F increase in the average temperature in Connecticut by 2050, an average of 25 days per year over 90°F by 2050 with increasingly hotter nights as well, and increased drought risk. Both Connecticut’s existing RGGI regulations and the proposed updates are aimed at reducing CO₂ emissions from power plants, which are one of the principal drivers of human-caused climate change. Studies have shown RGGI has helped reduce CO₂ and co-pollutant emissions from fossil fuel-fired power plants and that air pollution reductions attributable to RGGI have provided numerous health benefits to Connecticut and other states.⁴ DEEP implements RGGI in Connecticut pursuant to the direction of the Connecticut General Assembly, which in CGS Section 22a-200c directs that “The Commissioner of Energy and Environmental Protection shall adopt regulations, in accordance with chapter 54, to implement the Regional Greenhouse Gas Initiative.” Implementing RGGI includes the need to periodically update these regulations, which is required for Connecticut to continue participating in RGGI.

Comment 4. Some commenters questioned the efficacy of RGGI in reducing CO₂ emissions. Connecticut Light and Power Company d/b/a Eversource Energy (Eversource) commented that RGGI “has not led to meaningful resources being built nor meaningful reductions in CO₂.” Eversource attributed prior reductions in emissions to factors and policies other than RGGI and noted that CO₂ emissions in the ISO New England market “have largely been unchanged in the past decade.” As addressed elsewhere, the Connecticut Business and Industries Association

⁴ See, e.g., Brian C. Murray and Peter T. Maniloff, [“Why have greenhouse emissions in RGGI states declined? An econometric attribution to economic, energy market, and policy factors,”](#) *Energy Economics* 51: 581-589 (2015); Abt Associates (2017), [Analysis of the Public Health Impacts of the Regional Greenhouse Gas Initiative, 2009–2014](#); Frederica Perera, David Cooley, Alique Berberian, David Mills, and Patrick Kinney, [“Co-Benefits to Children’s Health of the U.S. Regional Greenhouse Gas Initiative,”](#) *Environmental Health Perspectives* 128(7): 77006 (2020).

(CBIA) noted that continued participation in RGGI is important to ensure that Connecticut continues to receive allowance proceeds that are used to offset costs in the regional electricity market. However, CBIA also commented there is lack of “a clear, direct casual connection between RGGI imposed restrictions and greenhouse gas emission reductions in Connecticut.”

Response. DEEP acknowledges these comments but disagrees with commenters’ conclusions. The purpose of RGGI is to reduce CO₂ emissions at lowest cost, which it has helped accomplish over the last 17 years. Prior research has found that while other factors also have been involved, RGGI has been a significant factor in reducing power sector CO₂ emissions.⁵ As of 2025, CO₂ emissions from power plants covered by RGGI were approximately 47 percent below 2005 levels. RGGI works by incentivizing least cost CO₂ emission reductions no matter where they are located across the region. The 11-state market provides a greater pool of emission reduction opportunities than if the market were restricted to Connecticut or New England alone, which enables lower cost solutions. Because CO₂ emissions contribute to climate change no matter where they occur, reducing emissions, including in other parts of the region when they can be reduced at lower cost, is beneficial to Connecticut’s environment as well as to Connecticut ratepayers by keeping the costs of the initiative lower.

As recognized in the 2005 [Memorandum of Understanding](#) establishing RGGI, the CO₂ emission cap always has been intended to work alongside other state policies, including energy efficiency programs and clean energy procurements that also help bring down emissions and bring new clean energy online. In Connecticut and other states, RGGI proceeds help support investments in energy efficiency, clean energy, and clean transportation that directly contribute to CO₂ emission reductions. As noted in RGGI states’ June 2026 [Investment of RGGI Proceeds](#) report, RGGI-funded investments through 2024 will prevent 70 million tons of CO₂ emissions.

Economic and Ratepayer Effects

Comment 1. Many commenters supporting the proposed regulations cited economic benefits from RGGI and the importance of adopting the regulations to achieve further such benefits. Several cited analyses that have found RGGI has provided net economic benefits to participating states, including net increases in economic activity (GDP) and jobs, and cited projections that the proposed regulations will support additional GDP growth and jobs. Some commenters, including the Connecticut Green Bank, E2, and others, noted RGGI supports Connecticut’s green economy, which is one of the fastest growing sectors in the state and employs tens of thousands of Connecticut workers.⁶ The Green Bank noted RGGI funds used to support Green Bank investments enable the Green Bank to further leverage private capital to stimulate the state’s green

⁵ See Brian C. Murray and Peter T. Maniloff, [“Why have greenhouse emissions in RGGI states declined? An econometric attribution to economic, energy market, and policy factors.”](#) *Energy Economics* 51: 581-589 (2015) (“The analysis shows that after the introduction of RGGI in 2009 the region’s emissions would have been 24% higher without the program, accounting for about half of the region’s emissions reductions during that time, which were far greater than those achieved in the rest of the United States.”).

⁶ Connecticut Green Bank and E2’s comments cited the following studies showing the scale and impact of Connecticut’s green economy: BW Research Partnership (2026), [2025 Connecticut Clean Energy Industry Report](#); E2 (2025), [Clean Jobs America 2025](#).

economy. The chair of the Portland Clean Energy Task Force noted RGGI investments create jobs and boost economic growth while also generating local and state tax revenue. Some commenters cited RGGI's economic performance as evidence that pollution reduction and economic growth can go hand in hand. The Regional Plan Association (RPA) commented that shifting from reliance on inefficient and dirty fossil fuel power plants to cleaner, more efficient generation has been a net benefit to RGGI states. Some commenters also cited the economic benefits of air pollution reductions under RGGI, including reduced medical expenses in the state, as well as the higher economic costs of not addressing climate change, such as damage caused by extreme weather.

Response. DEEP thanks the commenters for their support of the proposed regulations. As commenters note, prior analyses of RGGI have found the initiative has provided net economic benefits to participating states. A May 2023 report from Analysis Group concluded that from 2009 to 2020, RGGI provided regional net economic benefits valued at \$5.7 billion and created 48,000 new job-years of employment, alongside CO₂ emission reductions.⁷ As discussed in the [fiscal note](#) to the proposed regulations, a regional economic impact analysis performed by ICF International (ICF) for the RGGI states projected that the macroeconomic impact of the RGGI updates would be positive to Connecticut's economy, including projected net increases of 5,735 to 6,639 job-years and \$551 million to \$1.2 billion in state GDP through 2040.

Comment 2. DEEP received many comments supporting the regulations that cited RGGI's affordability benefits to Connecticut ratepayers. These included comments noting RGGI provides funding for direct rate relief and investments in energy efficiency and other energy savings initiatives that provide energy bill savings to Connecticut consumers. Many of the comments cited the \$627 million in RGGI allowance proceeds received by Connecticut, as of RGGI's June 2026 auction, and the uses of these proceeds to lower energy bills, including \$117 million for direct rate relief, \$338 million to support energy efficiency improvements, and over \$100 million to support clean energy financing by the Connecticut Green Bank and clean transportation rebates to Connecticut households and businesses through the Connecticut Hydrogen and Electric Automobile Purchase Rebate (CHEAPR) program.⁸ Some commenters noted RGGI-funded investments in energy efficiency permanently lower bills for households and businesses by reducing energy demand. Multiple commenters noted RGGI-funded energy efficiency investments return greater economic benefits to the state than they cost to implement. The Connecticut Green Bank, which receives funding from RGGI, noted 100 percent of the RGGI funding it receives is invested in clean energy projects that benefit Connecticut ratepayers and that \$90.5 million in RGGI funding to the Green Bank to date has supported 155 clean energy projects that are saving Connecticut businesses, towns, schools, nonprofit organizations, and others over \$160 million in energy costs. One comment said improving access to energy efficiency and renewable energy empowers Connecticut residents. Another commenter said these benefits are of great value to lower income residents who pay a disproportionate percentage of their income towards heating,

⁷ Analysis Group (2023), *[The Economic Impacts of the Regional Greenhouse Gas Initiative on Ten Northeast and Mid-Atlantic States: Review of RGGI's Fourth Three-Year Compliance Period \(2018-2020\) and Options for RGGI States to Advance Key Equity Priorities](#)*.

⁸ As of RGGI's September 2026 auction, Connecticut now has received \$688 million in RGGI allowance proceeds to date, including over \$178 million to date for direct rate relief, \$338 million to date to support energy efficiency improvements, and over \$100 million to date to support clean energy financing by the Connecticut Green Bank and clean transportation rebates to Connecticut households and businesses through the CHEAPR program

air conditioning, and electricity. The chair of the Portland Clean Energy Task Force noted investments in energy efficiency and solar provide broader grid benefits and bill savings to all ratepayers, including those who do not directly adopt these clean energy measures.

Response. DEEP thanks the commenters for their support of the proposed regulations. As discussed in the [notice of intent](#) and [fiscal note](#) to the proposed regulations, RGGI provides significant funding to Connecticut. As commenters note, that funding is used to provide direct rate relief in the form of ratepayer credits that reduce the public benefits charge on monthly electricity bills. RGGI funding also supports energy savings programs, including energy efficiency, clean energy, and clean transportation investments and rebates, that help lower energy bills for participating customers, while providing broader electric grid and affordability benefits to all ratepayers. Adopting the proposed regulations will ensure the continued availability of RGGI proceeds to support rate relief and energy savings programs in Connecticut.

Comment 3. Several commenters cited a bill impact analysis of the proposed regulations, which projected minimal impacts on electricity bills. Multiple commenters also expressed support for enhanced ratepayer protections included in the proposed regulations through the expanded CCR. Some commenters noted that by reducing reliance on fossil fuels and investing in clean energy, RGGI helps reduce ratepayers' exposure to volatile fossil fuel prices that can increase bills.

Response. As commenters note, and as discussed in the [fiscal note](#) to the proposed regulations, Analysis Group performed an analysis for the RGGI states of the effects of the proposed RGGI updates on retail rates and electricity bills for all classes of customers. Accounting for Connecticut's continued use of RGGI proceeds to lower bills, the bill impact analysis projected minimal potential impacts from the proposed RGGI updates in Connecticut, ranging from less than a half percent increase to less than a two percent decrease in monthly electricity bills. The expanded CCR under the proposed regulations will provide further ratepayer protection by releasing additional allowances to the market if prices exceed a defined threshold in the regulations to put downward pressure on prices. RGGI's existing CCR has helped to lower prices through the release of such allowances in response to market conditions. The updated regulations will increase the number of allowances that can be released for cost containment under the CCR in future years. DEEP agrees that reducing reliance on fossil fuels through RGGI and other efforts can reduce electric rate impacts on Connecticut consumers caused by fossil fuel price volatility and price spikes linked to geopolitical events and global markets. According to New England's independent grid operator, ISO New England, rising natural gas prices in 2025 were "the principal driver of increased wholesale costs" for electricity in the region.⁹

Comment 4. Many commenters, including CBIA, noted Connecticut ratepayers would continue to pay for RGGI compliance costs in other New England states, even if Connecticut were to stop participating directly in RGGI, because these costs would continue to be embedded in regional electricity market prices in New England. CBIA and others noted that remaining in RGGI is necessary for Connecticut to continue to receive RGGI allowance proceeds that Connecticut uses to help offset these costs, including through rate relief and investments in energy efficiency and

⁹ ISO New England (2026), [2025 Annual Markets Report](#).

other energy savings programs. Several commenters further noted adopting the proposed regulations is required for Connecticut to remain in RGGI.

Response. DEEP acknowledges these comments and agrees. Because all of Connecticut's state neighbors participate in RGGI, ISO New England regional wholesale energy markets will continue to reflect emitting generators' RGGI compliance costs whether Connecticut participates directly in RGGI or not. Continuing to participate in RGGI, by adopting the proposed updated regulations, however, is required for Connecticut to continue to receive RGGI allowance proceeds. If Connecticut fails to adopt the updates to the regulations, ratepayers will continue to pay wholesale market costs associated with RGGI but will no longer receive benefits from Connecticut's investments of RGGI proceeds. In other words, not adopting these regulations would result in higher bills and make electricity less affordable in Connecticut.

Comment 5. CBIA and Connecticut Industrial Energy Consumers (CIEC), which are both associations representing businesses in Connecticut, noted RGGI allowance prices have increased and expressed concern that the proposed regulations could lead to further allowance price increases, which could increase the cost of generating power in the region and lead to higher electricity costs for consumers. CBIA noted Connecticut businesses face higher energy costs than businesses in many competing states and Connecticut has the most expensive energy market in the region to operate a business. CBIA further urged evaluating the cumulative impact of energy and environmental policies on energy costs and to view policies through the lens of affordability and competitiveness. CIEC raised concerns that RGGI's declining emission cap could conflict with the need to ensure affordable, reliable energy given shrinking grid reliability margins, significant load growth, and increasing headwinds to deploying new electricity generation and infrastructure. As with CBIA, CIEC noted the impact of higher energy prices on its members, which are large, high-load-factor companies.

Response. DEEP acknowledges the commenters' concerns and is committed to ensuring RGGI contributes to an affordable, reliable electricity grid in Connecticut. As noted by CBIA and others, Connecticut ratepayers will pay RGGI compliance costs whether Connecticut directly participates in and implements RGGI or not because Connecticut is part of a regional New England electricity grid in which all other states participate in RGGI. Adopting the proposed regulations is required for Connecticut to continue to participate in RGGI and continue receiving tens of millions of dollars in annual RGGI allowance proceeds, which the state uses to provide direct rate relief, through credits that reduce the public benefits charge, as well as support energy efficiency, clean energy, and clean transportation investments that lower energy bills, including for Connecticut businesses.¹⁰ If Connecticut does not adopt the proposed regulations and no longer receives these funds, the result would be higher electricity rates and bills in the state.

As commenters note, the price of a RGGI allowance has increased in recent years, including in 2026. Because New England still relies significantly on fossil fuel power generation for electricity, higher allowance prices currently lead to higher wholesale

¹⁰ Connecticut Green Bank's [comments](#) on the proposed regulations, for example, document energy cost savings to commercial and industrial customers in Connecticut from RGGI-funded clean energy project financing.

electricity prices in the ISO New England market. As further discussed in DEEP’s response to the Joint Senate Republican Comments below, Connecticut’s energy contracting strategy, including contracts with the Millstone Nuclear Power Station, currently insulate ratepayers from approximately half of these allowance costs. Further offsets are provided through the ratepayer relief provisions of Connecticut’s RGGI regulations and the state’s other uses of RGGI allowance proceeds. The expanded CCR included in the proposed regulations will increase the amount of ratepayer relief provided through RGGI by increasing the allowance proceeds received by Connecticut at higher allowance prices. Under the regulation’s existing ratepayer relief mechanism, such increases in proceeds would be used to provide additional ratepayer relief to help offset wholesale market costs.

As part of DEEP’s commitment to ensuring RGGI’s affordability, Connecticut, represented by DEEP and PURA, and the other RGGI states have committed to launch the next regional program review of RGGI [no later than 2028](#). This review will consider factors such as changes in energy policy, the pace and scale of electricity load growth, progress in clean energy deployment, and ongoing efforts to ensure energy affordability. This review will provide an early opportunity to evaluate the performance of the updates to RGGI and make adjustments if needed. This could include, for example, potential adjustments to RGGI’s future cap trajectory or cost containment mechanisms if needed to ensure the initiative’s continued success in contributing to a reliable, affordable, clean electricity supply.

Comment 6. Fulcrum Foundation commented that potential ratepayer savings presented in the fiscal note accompanying the proposed regulations are unlikely, citing DEEP’s observation that recent RGGI allowance prices have been more similar to prices in a modeled case that resulted in higher costs, and that “a modest increase in ratepayer costs, not a decrease, is the expected outcome.” The comments also criticized the Department for “rely[ing] on the more favorable scenario as its headline characterization while conceding that the less favorable scenario reflects current conditions.” Fulcrum Foundation presented its own estimates of ratepayer impacts in its comments, based on “observed historical evidence,” to “produce[] an independent estimate of a 0.21 percent to 0.43 percent increase in residential electricity costs, equivalent to roughly \$0.44 to \$0.87 on a representative monthly bill.” Fulcrum Foundation further requested that DEEP provide additional information on the modeling cited in the fiscal note, including allowance price projections and the treatment of privately held banked allowances in the modeling.

Response. The Department is confused by commenter’s claim that DEEP provides a misleading “headline characterization” of the proposed regulations. As the commenter noted, DEEP presents a range of potential ratepayer impacts in the [fiscal note](#), based on modeling performed for the RGGI states by the consulting firm Analysis Group. In relevant part, the fiscal note states, “the updated RGGI rule could cause monthly electricity bills in Connecticut to either slightly rise (under the greater headwinds to clean energy scenario) or slightly decrease (under the smoother clean energy transition scenario), as compared to a reference case based on recent market costs. The magnitude of these potential bill impacts is small, ranging from less than a half percent increase on the high end to less than a two percent decrease on the low end.” The fiscal note is clear that modeling of the changes included the possibility of a modest increase, of less than half a percent, in costs; however,

even if this scenario were to occur, not adopting the proposed regulations and dropping out of RGGI would be more costly to Connecticut ratepayers.

Because all of Connecticut's state neighbors participate in RGGI, ISO New England regional energy markets will continue to reflect emitting generators' RGGI compliance costs whether the state participates directly in RGGI or not. In other words, if Connecticut fails to adopt these regulations, ratepayers will continue to pay regional market costs associated with RGGI but will no longer receive benefits from Connecticut's investments of RGGI proceeds. Thus, not adopting the proposed regulations would result in higher electric bills and make electricity less affordable in Connecticut. Further estimates of the costs to Connecticut ratepayers in 2027 of not adopting the proposed regulations, as well as savings to ratepayers under the proposed regulations compared to current regulations, are included in DEEP's response to the Joint Senate Republican Comments further below.

More information on the assumptions and outputs, such as allowance price projections, from the modeling discussed in the fiscal note is available on the RGGI, Inc. website (www.rggi.org) under "[Program Review](#)" (see "Supporting Materials" and additional information posted under "Meeting Materials"). The Regional Greenhouse Gas Initiative, Inc. (RGGI, Inc.) is a 501(c)(3) nonprofit organization created by Connecticut and the other RGGI participating states to provide technical and administrative services to the states participating in RGGI. The Commissioner of DEEP and Chairman of PURA sit on RGGI, Inc.'s [Board of Directors](#). Connecticut and the other RGGI states each have [contracts](#) with RGGI, Inc. to provide services to the states, including RGGI, Inc.'s assistance in coordinating and facilitating the states' joint periodic regional program reviews of RGGI, including modeling conducted for the states of the power sector and projected macroeconomic and bill effects of the proposed updates to RGGI.

Comment 7. Fulcrum Foundation commented that "Claims of Economic Benefit are not Supported by Evidence." The commenter stated such economic benefits are "difficult to reconcile" given the proposed regulations may increase operating costs for fossil fuel power plants and may increase wholesale electricity prices, and such result "depends entirely on a tenuous modeling assumption: that recycling allowance auction proceeds into energy efficiency and clean energy programs generates more economic activity than the underlying cost increase removes." Fulcrum Foundation noted the modeled macroeconomic benefits cited in the fiscal note are small, "within the margin of error," and "cannot bear the weight the Department places on them as an affirmative justification for the rule." The comments requested that DEEP "disclose the assumptions underlying its macroeconomic projections, present the results with appropriate acknowledgment of their dependence on proceeds-reinvestment assumptions, and refrain from characterizing effects within the margin of modeling error as affirmative economic benefits of the rule."

Response. More information on the macroeconomic modeling cited in the [fiscal note](#) is available on the RGGI, Inc. website (www.rggi.org) under "[Program Review](#)" (see "Supporting Materials"). As discussed in the [fiscal note](#), this modeling was performed for the RGGI states by the consulting firm ICF using the Regional Economic Models, Inc. (REMI) model. As the fiscal note states, "ICF projects that the macroeconomic impacts of the RGGI updates in Connecticut will be net positive to the state's total employment, gross

state product, and personal income levels.” Similar to the bill impact analysis, the macroeconomic modeling projected the impacts of the updates to RGGI under two potential scenarios: a greater headwinds to clean energy scenario and a smoother clean energy transition scenario. The modeling projected positive cumulative economic benefits to employment level, gross state product, and disposable personal income in Connecticut under both scenarios. As the fiscal note acknowledges, “In terms of magnitude, these macroeconomic benefits are small when compared to the state’s overall economy.”

The commenter is correct that Connecticut’s uses of RGGI allowance proceeds are key factors in the economic modeling; however, DEEP disagrees with the commenter that the projections of economic benefits are “difficult to reconcile.” As discussed in the fiscal note, [notice of intent](#), and prior responses above, Connecticut’s uses of RGGI proceeds to provide direct rate relief and support energy savings programs help to offset RGGI’s wholesale market costs to ratepayers and can produce greater benefits than the programs cost to implement. For example, according to Connecticut’s investor-owned utilities, Eversource and United Illuminating (UI), Connecticut’s energy efficiency programs, which are partially funded by RGGI, are projected to generate \$3.30 in economic benefits for every \$1 spent between 2025 and 2027.¹¹ Comments from the [Connecticut Green Bank](#) on the proposed regulations further document that \$90 million in RGGI funding to support the Green Bank’s clean energy financing programs are saving Connecticut businesses over \$160 million in energy costs, a return of over \$1.60 in energy savings per \$1 spent. Prior retrospective analyses of RGGI have similarly found the initiative has provided net economic benefits alongside CO₂ emission reductions to the participating states. A May 2023 report from Analysis Group concluded that, from 2009 to 2020, RGGI provided regional net economic benefits valued at \$5.7 billion and created 48,000 new job-years of employment.¹² Notably, this evaluation found net economic benefits from RGGI even without accounting for any of RGGI’s climate or public health benefits, which prior studies have found are substantial.¹³

Comment 8. Eversource expressed concerns about the cost of RGGI to ratepayers and that the initiative could become more expensive under the proposed regulations. Eversource stated ISO New England estimated RGGI added \$11-17/MWh in costs to a typical natural gas combined cycle generator and \$24-38/MWh for a No. 2 oil-fired generator last winter. Because fossil fuel units are on the margin most of the time in New England, Eversource noted RGGI allowance price impacts on fossil fuel generators increase wholesale electricity market clearing prices, leading to increases in electric supply costs. Eversource requested that DEEP further evaluate the proposed regulations and recommended that Connecticut work with other New England states to address RGGI

¹¹ Eversource Energy, United Illuminating, Connecticut Natural Gas, and Southern Connecticut Gas (2024), [2025-2027 Conservation & Load Management Plan](#).

¹² Analysis Group (2023), [The Economic Impacts of the Regional Greenhouse Gas Initiative on Ten Northeast and Mid-Atlantic States: Review of RGGI’s Fourth Three-Year Compliance Period \(2018-2020\) and Options for RGGI States to Advance Key Equity Priorities](#).

¹³ See, e.g., Brian C. Murray and Peter T. Maniloff, “Why have greenhouse emissions in RGGI states declined? An econometric attribution to economic, energy market, and policy factors,” *Energy Economics* 51: 581-589 (2015); Abt Associates (2017), [Analysis of the Public Health Impacts of the Regional Greenhouse Gas Initiative, 2009–2014](#); Frederica Perera, David Cooley, Alique Berberian, David Mills, and Patrick Kinney, “Co-Benefits to Children’s Health of the U.S. Regional Greenhouse Gas Initiative,” *Environmental Health Perspectives* 128(7): 77006 (2020).

affordability concerns “in the coming years.” Separately, Fulcrum Foundation commented that electricity cost challenges “have been compounded in many states by the adoption of production constraints and energy taxes designed to favor the production of ‘renewable’ energy,” that RGGI “is one such scheme which continues to hamper energy production and raise the cost of energy for both businesses and consumers,” and that the proposed regulations “threaten to exacerbate the already damaging effects of RGGI.” Some commenters also expressed opposition to the proposed regulations and/or advocated for Connecticut to withdraw from RGGI based on cost concerns.

Response. DEEP appreciates commenters’ concerns about ensuring affordability but disagrees with their analyses of RGGI. Commenters overstate RGGI’s impacts and do not account for Connecticut policy mechanisms, including mechanisms implemented by Eversource, that offset RGGI’s wholesale market impacts and provide rate relief benefits for Connecticut ratepayers. The proposed expanded CCR means that at similar allowance prices the updated regulations would save Connecticut ratepayers money next year by providing more allowance proceeds to the state for ratepayer relief, compared to the current regulations in 2026. In contrast, not adopting these regulations and dropping out of RGGI would lead to net ratepayer costs and higher electric bills in 2027 and beyond.

These Eversource and Fulcrum Foundation comments notably do not account for the benefits of Connecticut’s competitively procured clean energy contracts, including contracts Eversource has signed at DEEP’s direction, which insulate ratepayers from RGGI’s effects in the ISO New England wholesale market. The current contracts alone offset nearly half of the wholesale market price impacts Eversource raised, as explained further in the response to the Joint Senate Republican comment below. Connecticut further protects ratepayers by using proceeds from RGGI’s allowance auctions to provide both near-term rate relief and longer-term energy savings and benefits. For example, under the ratepayer relief provisions of Connecticut’s RGGI regulations, PURA returned \$39.5 million in RGGI proceeds from 2025 to ratepayers, in the form of credits that are currently reducing the public benefits charge by approximately \$1 per month for the average residential ratepayer. PURA similarly returned over \$35 million to Connecticut ratepayers from the state’s 2024 RGGI proceeds. Over \$61 million collected in RGGI’s June and September 2026 allowance auctions will be returned by PURA to Connecticut ratepayers as rate relief from Connecticut’s 2026 RGGI proceeds. The final amount will be higher as all of Connecticut’s proceeds from RGGI’s December 2026 allowance auction also will be returned as rate relief. Approximately \$30 million a year in RGGI proceeds also goes to support the Conservation and Load Management (C&LM) energy efficiency programs implemented by Eversource and UI. According to the 2025-2027 C&LM Plan filed with DEEP by the utilities, these programs “generate \$3.30 in benefits to Connecticut’s economy for every \$1 invested.”¹⁴ RGGI funding for energy efficiency increases the annual C&LM program budgets, enabling more households to benefit from energy savings while providing broader grid benefits that lower bills for all customers, such as by avoiding or deferring the need for more costly investments in distribution and transmission infrastructure and more expensive generation.

¹⁴ Eversource Energy, United Illuminating, Connecticut Natural Gas, and Southern Connecticut Gas (2024), [2025-2027 Conservation & Load Management Plan](#).

Eversource overstated RGGI’s impact by incorrectly attributing solely to RGGI ISO New England’s estimates of carbon policy costs to fossil fuel generators last winter. In fact, in the report Eversource cited, ISO New England stated these costs stemmed from multiple factors, including the RGGI price and a separate state policy adopted by Massachusetts. ISO New England further noted, “Higher natural gas prices were the main driver of elevated energy costs” in the region.¹⁵ Moreover, ISO New England recognizes that RGGI’s wholesale market impacts do not tell the whole story for affordability, given the offsetting benefits of Connecticut and other states’ uses of RGGI allowance proceeds. In its most recent annual market report, released in May 2026, ISO New England noted, “the energy market net cost of these carbon programs is significantly lower because the proceeds from auctioning the allowance credits are invested in initiatives that focus on reducing emissions, such as energy efficiency programs and clean and renewable energy.”¹⁶

Importantly, as also explained in DEEP’s responses to other comments above, and pointed out by several commenters in this rulemaking, if Connecticut does not adopt the proposed regulations, Connecticut residents and businesses would see increases in electricity rates and bills. This is because Connecticut ratepayers would continue to pay RGGI compliance costs in other New England states in the regional wholesale market but would lose Connecticut’s share of RGGI allowance proceeds—amounting to tens of millions of dollars a year—which the state uses to provide rate relief and to support energy savings programs. These programs including the C&LM programs implemented by Eversource, lower energy bills for consumers. Thus, there is no affordability benefit to not adopting the regulations, and, if Connecticut were to withdraw from RGGI, this would harm rather than help energy affordability in the state.

DEEP does agree with Eversource that Connecticut should continue to work closely with other states to ensure RGGI contributes to affordable, reliable, clean energy in the region. As noted above, DEEP and PURA and the other RGGI states have committed to launch their next regional program review of RGGI [no later than 2028](#). This review will consider factors such as changes in energy policy, the pace and scale of electricity load growth, progress in clean energy deployment, and ongoing efforts to ensure energy affordability, and will provide an early opportunity to evaluate the performance of the current updates to RGGI and to make adjustments to cost containment or other RGGI mechanisms if needed.

Comment 9. Eversource commented that “RGGI is an inefficient revenue generation mechanism for unaffiliated clean energy programs,” citing Connecticut’s \$85 million in RGGI allowance proceeds in 2025 compared to Eversource’s estimate of \$250 million in increased wholesale market costs. The company also commented that funding for programs supported by RGGI “could be sourced from many alternative sources, including mechanisms that are more transparent, less volatile, more equitable and do not directly raise the cost of electricity in the region.”

¹⁵ Directionally, the ISO New England report noted average natural gas prices had increased 31 percent, RGGI allowance prices had increased 14 percent, and costs of the Massachusetts policy had increased 133 percent year-over-year. ISO New England (2026), [Winter 2026 Quarterly Markets Report](#), at 9.

¹⁶ ISO New England (2026), [2025 Annual Markets Report](#), at 38.

Response. RGGI provides multiple benefits, including but not limited to allowance auction proceeds, which Connecticut uses to provide direct rate relief and funding for energy savings programs, including energy efficiency. As explained in DEEP’s response to Eversource above, Connecticut’s clean energy contracts, signed by Eversource and UI, insulate Connecticut ratepayers from nearly half the wholesale market costs Eversource raises. Further, by Eversource’s own estimates, the C&LM programs, which are funded in part by RGGI, “generate \$3.30 in benefits to Connecticut’s economy for every \$1 invested,” meaning that investments in these programs provide significantly more benefits than they cost.¹⁷ Comments by the [Connecticut Green Bank](#) further document the Green Bank’s investments of RGGI proceeds in clean energy financing programs that provide more energy savings than the programs cost. In other words, RGGI supports energy savings programs that create substantially more ratepayer savings and economic benefits than they cost to implement, helping to offset the cost differences cited by Eversource. As discussed in prior responses, RGGI also provides many other economic and health benefits to Connecticut while helping to meet the state’s greenhouse gas emission reduction goals.

Although Eversource suggested that other, possibly preferable funding mechanisms could support RGGI-supported beneficial energy savings programs, the company did not provide examples or specific recommendations of such alternative mechanisms in its comments. In fact, the energy savings programs supported by RGGI receive funding from multiple sources, including ratepayers through assessments in the public benefits charge. RGGI funding supplements these programs, while also helping to lower the public benefits charge for ratepayers through RGGI’s ratepayer relief returns. Connecticut’s uses of RGGI proceeds are transparently documented in the annual [Investment of RGGI Proceeds](#) reports published by Connecticut and the other RGGI states. Further information on Connecticut’s uses of RGGI proceeds and the programs supported by RGGI funding in Connecticut can be found in annual reports to the legislature from the [Connecticut Green Bank](#) and the state’s [Energy Efficiency Board](#), the [C&LM Plans and Plan Updates](#) filed by Eversource itself, and the [CHEAPR Statistics](#) webpage.

Market Design

Comment 1. Multiple commenters expressed support for RGGI’s market-based design, noting cap-and-invest is a proven model that reduces emissions, improves public health, and generates funding for beneficial investments. Some commenters mentioned RGGI’s allowance requirement holds fossil fuel generators accountable for their pollution while creating an economic incentive for investments in cleaner power generation and pollution reduction. Commenters also noted RGGI’s declining emission cap and that the proposed updates to the cap provide clear, directional guidance to the power sector to reduce CO₂ emissions and transition to clean and renewable energy. CLF commented that RGGI’s regional approach is well suited to New England’s interconnected electricity system and regional energy markets and incentivizes cost-effective CO₂ emission reductions across participating states. Multiple commenters expressed support for the proposed expanded CCR to balance affordability and environmental goals, help safeguard against price spikes, and provide flexibility for compliance entities by ensuring allowance availability for

¹⁷ Eversource Energy, United Illuminating, Connecticut Natural Gas, and Southern Connecticut Gas (2024), [2025-2027 Conservation & Load Management Plan](#).

necessary emissions. Save the Sound expressed support for the proposed removal of offsets, the ECR, and set aside accounts to streamline RGGI's design and reduce administrative complexity. Acadia Center and RPA also expressed support for removing offsets.

Response. DEEP acknowledges these comments and thanks the commenters for their support of the proposed regulations. DEEP agrees that RGGI's market design is a proven approach that has helped achieve least-cost emission reductions and economic and health benefits, and that the proposed updates to RGGI will build on—and are important to continuing—the initiative's success.

Comment 2. Eversource commented that RGGI “is based on decades-old economic theories about the most efficient mechanisms for meeting climate goals,” but that “there has been little retrospective analysis of whether such programs provide least-cost pathways to meeting climate goals compared to alternative approaches currently being implemented in other regions.”

Response. As discussed in the [fiscal note](#) and DEEP's responses to comments above, numerous studies have found that, in addition to helping reduce CO₂ emissions, RGGI has provided net economic and health benefits to participating states.

Comment 3. Fulcrum Foundation raised concerns that the removal of the ability to generate future allowance offsets under the proposed regulations could increase the costs of RGGI compliance and costs to consumers. Fulcrum Foundation noted the relative absence of historical offset use does not mean offsets could not provide value in the future, particularly if RGGI allowance prices are higher than in prior years. The commenter provided hypothetical calculations showing potential cost savings from offsets, when assuming future availability of offsets at prices below the market price for allowances, and urged DEEP to reassess the cost impacts of offsets removal.

Response. DEEP acknowledges the comment but disagrees with the commenter that further analysis of offsets is required prior to rule adoption. As discussed in the [notice of intent](#) and [fiscal note](#), no offset projects have been proposed in Connecticut for DEEP's approval since RCSA Section 22a-174-31a was adopted in 2008, and RGGI offset projects have similarly played minimal to no roles in the other states participating in RGGI. Higher allowance prices in recent years have not resulted in proposed offset projects for DEEP's approval. As part of their July 2025 agreement, the RGGI states have collectively agreed to remove offsets from RGGI's market design effective January 1, 2027; however, any offset allowances awarded prior to January 1, 2027, will still be eligible for compliance use in Connecticut (or other RGGI states), subject to existing limits on their use in RCSA Section 22a-174-31. The removal of future offsets in states' respective RGGI regulations as of January 1, 2027, is required by RGGI participants to preserve the fungibility of allowances among the participants. Thus, Connecticut cannot maintain the existing RCSA Section 22a-174-31a and continue to participate in RGGI.

Importantly, while new offsets will no longer be supported under RGGI, the changes to the CCR under the proposed regulations are designed to provide a greater source of ratepayer protection and compliance flexibility than the offset provisions that are being eliminated. Under the current regulations, power plants are limited to using offsets to meet no more

than 3.3 percent of their RGGI allowance obligations. In effect, this means offsets can increase the cap by no more than 3.3 percent per year. The existing CCR already provides substantially more flexibility: up to a 10 percent annual increase in the cap through the release of additional allowances. Under the proposed regulations, an expanded CCR will provide a larger up to 16.8 percent increase in allowance availability in 2027, at an initial allowance price threshold of \$19.50, and an additional up to 16.8 percent increase, at a second price threshold of \$29.25 (i.e., 33.6 percent overall in potential additional allowance availability and flexibility under the updated regulations, compared to 10 percent under the existing CCR and 3.3 percent under existing the offset provisions). Combined, the expanded CCR will make available approximately three times more allowances for cost containment in 2027 than are available under the current CCR in 2026.

Under the current RGGI regulations, both the CCR and existing limitations on generators' use of offsets for compliance are defined based on percentages of the annual cap and/or generators' compliance obligations under the cap (10 percent and 3.3 percent, respectfully). This means that, as RGGI's cap declines, the flexibility provided under the current CCR and potential flexibility from offsets each year also declines (i.e., is 10 percent or 3.3 percent of a smaller number). In contrast, the updated CCR under the proposed regulations will provide a fixed number of allowances—616,683 at each CCR price threshold in Connecticut—each year. Because the number of CCR allowances made available in future years will remain constant, the expanded CCR will represent a larger potential cap increase in percentage terms in future years as the cap declines. These additional CCR allowances and the switch from percentage-based flexibility mechanisms to a fixed-size CCR will provide increased flexibility and ratepayer protection that will more than offset the elimination of RCSA Section 22a-174-31a's unused-to-date offset provisions.

Comment 4. CIEC, while supporting the proposed expansion of the CCR's affordability protections, expressed concern that this expansion may be insufficient to offset potential allowance price and cost increases, noting that recent allowance prices are higher than the updated CCR trigger prices in future years. In its comments, Eversource noted the CCR is not a cost cap and stated, "Connecticut should consider and coordinate with other New England states on potential cost containment measures as soon as possible to in the short-term address affordability concerns while further evaluating the least-cost path to decarbonize the grid in the long-term."

Response. DEEP appreciates commenters' concerns about ensuring affordability and is committed to ensuring RGGI continues to contribute to affordable, reliable, clean energy, including through RGGI's cost containment mechanisms. As discussed in DEEP's response to Fulcrum Foundation above, the proposed regulations will approximately triple the size of the CCR next year, making significantly more allowances available for cost containment. If allowance prices remain elevated next year, the expanded CCR will provide additional allowance proceeds to Connecticut, which would be used to provide further rate relief, resulting in ratepayer savings compared to existing regulations.

To further protect affordability, DEEP and PURA and the other RGGI states have committed to launch their next regional program review of RGGI [no later than 2028](#). This review will consider factors such as changes in energy policy, the pace and scale of

electricity load growth, progress in clean energy deployment, and ongoing efforts to ensure energy affordability, and will provide an early opportunity to evaluate the performance of the current updates to RGGI and to make additional adjustments or improvements to the initiative if needed. This could include, for example, potential further expansion of RGGI's existing cost containment mechanisms or introduction of new such mechanisms if needed to ensure RGGI continues to contribute to affordable, reliable, clean energy in the region.

Comment 5. One commenter, while supporting Connecticut's continued participation in RGGI, expressed concern that the expanded CCR under the proposed regulations could weaken RGGI's climate ambition and requested transparent, regular public reporting on whenever the CCR is triggered and on the impact of this mechanism on emissions.

Response. RGGI's market design and Connecticut's regulations implementing RGGI have included a CCR since 2014. The CCR helps keep RGGI compliance costs, and costs to ratepayers, lower by automatically reducing the level of cap reduction required when allowance prices exceed defined thresholds in the regulations. The mechanism strikes a balance between RGGI's environmental goals and ensuring sufficient allowance supply for both necessary emissions and affordability. The proposed regulations would expand RGGI's CCR—i.e., make additional potential allowances available in future years—in parallel with updates to RGGI's cap to achieve additional emission reductions. Inclusive of the CCR, the proposed updates would achieve at least a 61 percent reduction in Connecticut's RGGI cap, and up to a 90 percent reduction, by 2037. The level of cap reduction would depend on allowance prices in RGGI's quarterly allowance auctions, and whether the updated CCR is triggered, in future years. RGGI's existing CCR has been triggered periodically, helping to ensure lower prices through the release of additional allowances in response to market conditions. This has occurred in parallel with emission reductions; through the end of 2025, CO₂ emissions from RGGI-covered power plants in the region were 47 percent below 2005 levels. CCR allowance releases are reported by the RGGI states following each quarterly auction in which they occur. This information is available on the [Auction Results](#) page of the RGGI, Inc. website. Each CCR allowance represents potentially one short ton of additional CO₂ emissions in the region.

Comment 6. CIEC noted it strongly supports the limited exemption for Combined Heat and Power (CHP) facilities included in the proposed regulations. CIEC noted this provision will eliminate administrative burdens and costs, while providing reliability and affordability benefits for all consumers by reducing strain on the grid and making more allowances available for purchase.

Response. DEEP appreciates CIEC's support for converting the current limited allowance set aside for CHP facilities in Connecticut to a limited exemption for CHP facilities in the proposed regulations. As CIEC notes, these updates will ensure continued support for CHP facilities under Connecticut's RGGI regulations, while also increasing the number of allowances made available by Connecticut at auction by up to 1.5 percent each year. These additional allowance sales will provide increased flexibility for other generators by increasing the effective allowance supply while also increasing Connecticut's annual RGGI proceeds. Under the ratepayer relief provisions of Connecticut's RGGI rules, if

allowance prices are similar to current levels next year, these additional proceeds would be used to provide additional rate relief to Connecticut ratepayers.

Comment 7. Multiple commenters expressed support for RGGI’s multistate approach, with some commenters also expressing support for the commitment by Connecticut and other RGGI states to initiate their next joint program review of RGGI no later than 2028.

Response. DEEP thanks the commenters for their support and agrees with commenters on the value of RGGI’s multistate approach and of conducting regular regional program reviews. RGGI’s coordinated, multistate approach to CO₂ emission reduction helps reduce costs to ratepayers while achieving greater reductions in CO₂ emissions in the region than Connecticut could achieve alone. Connecticut and the other RGGI states’ commitment to launch a next regional program review [no later than 2028](#) is part of the states’ ongoing commitment to regularly evaluate RGGI and update the initiative as needed to ensure its continued success in contributing to a reliable, affordable, clean electricity supply.

Comment 8. Eversource expressed concern that potential dynamics in other parts of the RGGI region, such as data center growth in the Mid-Atlantic PJM grid region, as well as policy and market developments, could increase allowance demand, affecting affordability and potentially leading to allowance shortfalls in future years.

Response. DEEP is committed to ensuring RGGI continues to contribute to a reliable, affordable, clean electricity supply. This includes working with the other states and RGGI, Inc. to monitor the market to ensure it operates as intended, with sufficient allowances for necessary emissions as the grid decarbonizes. Through RGGI, Inc., Connecticut and the other states have contracted with Potomac Economics to serve as RGGI’s independent market monitor. The role of the market monitor includes monitoring the competitive performance and efficiency of the market and the supply of and demand for allowances. According to an [August 2026 report](#) from the market monitor, regional allowance supply is currently significantly larger than demand, with a large surplus of allowances available in the market that have been “banked” from prior sales (i.e., allowances sold that are in excess of current compliance needs but remain in the market and can be used for compliance in future years). While the size of this surplus has declined over time, the market monitor projects a large surplus will continue into the start of RGGI’s next three-year compliance period, covering 2027-2029. Combined with the expanded CCR, there is significant flexibility built into RGGI to meet allowance needs in the coming years. While developments such as new large loads could increase demand, projections of future growth, including its timing and locations and the types of power used to meet it, are uncertain and continue to evolve. The CCR, as well as the existing allowance bank, act as safeguards to buffer and help address this and other market developments and uncertainties. A larger RGGI market also provides additional opportunities to reduce emissions cost effectively.

The RGGI states’ next program review, which as noted above will begin [no later than 2028](#), will consider factors such as changes in energy policy, the pace and scale of electricity load growth, progress in clean energy deployment, and ongoing efforts to ensure energy affordability, including in New England and other parts of the region. The next review will

provide an early opportunity to evaluate the performance of the current updates to RGGI as well as to make adjustments to RGGI's future cap trajectory, cost containment mechanisms, or other program elements if needed to ensure RGGI continues to contribute to a reliable, affordable, and clean electricity supply.

Allowance Proceeds

Comment 1. As also noted in prior comment summaries above, DEEP received many comments from individuals and organizations referencing and supporting Connecticut's current uses of RGGI allowance proceeds to provide rate relief and support investments in energy efficiency, clean energy, and clean transportation that help to lower energy bills and provide other consumer benefits. One commenter expressed appreciation for the transparency of how RGGI funds are used, through the Connecticut Green Bank's [annual financial reports](#) and the Energy Efficiency Board's [annual legislative reports](#), which the commenter noted are audited by third parties.

Response. DEEP acknowledges and appreciates the comments. Connecticut's RGGI proceeds are allocated in accordance with the General Assembly's directions in CGS Section 22a-200c and DEEP's implementing regulations (RCSA Section 22a-174-31). Connecticut uses RGGI allowance proceeds to benefit ratepayers, including through direct rate relief and support for energy efficiency, clean energy, and clean transportation investments that help lower energy costs and bills. The proposed regulations will not change Connecticut's allocation of RGGI proceeds; however, adopting the regulations is necessary to ensure continued availability of RGGI proceeds to Connecticut to support investments in energy savings programs that benefit consumers. In addition to the annual reports mentioned by the commenter, the [Investment of RGGI Proceeds](#) reports published annually by RGGI, Inc., [C&LM Plans and Plan Updates](#) filed periodically by Eversource and UI, and the [CHEAPR Statistics](#) webpage provide further information on Connecticut's uses of RGGI proceeds and the programs supported by RGGI funding in Connecticut.

Comment 2. Municipal electric utility commenters Connecticut Municipal Electric Energy Cooperative (CMEEC) and Wallingford Electric Division (WED) submitted comments supporting the proposed updates to Connecticut's regulations to align with the regional RGGI Model Rule, while also advocating for a change to Connecticut's allocation of RGGI allowance proceeds. CMEEC and WED noted they currently receive load-based shares of 4.01 percent and 2.04 percent, respectively, of Connecticut's annual RGGI allowance proceeds, up to the annual ratepayer relief threshold specified in RCSA Section 22a-174-31(j). All proceeds above this annual ratepayer relief threshold are returned to Connecticut electric ratepayers by PURA. However, these ratepayer returns are currently only to ratepayers of Connecticut's two investor-owned utilities, Eversource and UI, and not to CMEEC or WED's customers. CMEEC and WED requested that DEEP amend Connecticut's RGGI regulations so that CMEEC and WED ratepayers also receive these returns, in proportion to CMEEC and WED's state load shares. CMEEC and WED stated their requests were intended only to focus on RGGI ratepayer relief returns and were not intended to open or reopen broader questions about municipal utilities' participation in other state energy, environmental, or public benefits programs.

Response. DEEP is open to legislative discussions, including with the Connecticut General Assembly, CMEEC, WED, Eversource, UI, and others, about potential future uses or changes to the allocation of RGGI proceeds. DEEP does not currently propose regulatory changes to the allocation of Connecticut’s RGGI proceeds, which have previously been approved by the General Assembly’s Legislative Regulatory Review Committee. Under RCSA Section 22a-174-31(j)’s existing ratepayer relief mechanism, which would be maintained, DEEP returns all RGGI proceeds above an annual ratepayer relief threshold, which is approximately \$47 million in 2026 and increases by 2.5 percent each year, “to the Public Utilities Regulatory Authority, in accordance with section 22a-200c of the Connecticut General Statutes, for return to Connecticut electric ratepayers, in accordance with section 16-19 of the Connecticut General Statutes.” PURA currently returns these proceeds to Eversource and UI ratepayers as a credit against the public benefits charge through the annual Rate Adjustment Mechanism (RAM) regulatory proceeding. From Connecticut’s 2025 RGGI proceeds, \$39.5 million above the 2025 ratepayer relief threshold were returned, representing an approximately \$1 reduction per month on the public benefits charge for the average Eversource or UI residential ratepayer. The public benefits charge, which is paid for only by Eversource and UI ratepayers, supports investments that provide grid benefits and savings to all Connecticut ratepayers, including CMEEC and WED ratepayers who do not currently contribute to this charge. This includes, for example, the costs of contracts for resources like nuclear, offshore wind, and solar, which lower wholesale electric rates and provide reliability benefits for all Connecticut ratepayers, but are currently paid for only by Eversource and UI ratepayers. RGGI ratepayer relief returns help to offset the costs to Eversource and UI ratepayers of funding these broadly beneficial investments.

Comment 3. CBIA commented that Connecticut should prioritize rate relief in its use of allowance proceeds, including by providing increased bill assistance and rate reductions if the proposed regulations result in higher allowance prices and proceeds to Connecticut. CBIA also advocated for using RGGI proceeds to offset costs of grid modernization and transmission infrastructure.

Response. DEEP agrees with CBIA on the importance of using RGGI proceeds to support energy affordability. Indeed, as further discussed below, the existing ratepayer relief mechanism in Connecticut’s RGGI regulations, which would be maintained, operates in much the way CBIA describes, with higher allowance prices and proceeds resulting in greater returns of proceeds, in both absolute and percentage terms, to ratepayers as rate relief. While DEEP does not currently propose any changes to the allocation of Connecticut’s RGGI proceeds, DEEP is open to future discussions with the Connecticut General Assembly as well as CBIA and other stakeholders (Eversource, UI, CMEEC, WED, etc.) about potential future uses or changes to the allocation of RGGI proceeds..

The ratepayer relief mechanism in the regulations returns all Connecticut RGGI proceeds above an annual threshold back to ratepayers via PURA as rate relief. PURA returns these funds to ratepayers as a credit that lowers the public benefits charge on bills. The annual threshold, which was originally established in 2014, is approximately \$47 million in 2026 and increases by 2.5 percent each year. When RGGI allowance prices increase, resulting in higher allowance proceeds, the percentage and amount of proceeds returned as rate relief

to Connecticut ratepayers automatically increases, with every dollar above the fixed annual ratepayer relief threshold returned to customers as rate relief. In each of the last two years (2024 and 2025), Connecticut sent almost half, more than \$35 million a year, of the state's RGGI proceeds back to Connecticut ratepayers as rate relief. In 2026, with higher allowance prices, DEEP estimates approximately two-thirds of proceeds may be returned as rate relief.¹⁸ In 2026, Connecticut's ratepayer relief threshold was exceeded as of RGGI's June 2026 allowance auction. As a result, thus far, \$24 million in RGGI proceeds collected in the June auction as well as all \$37 million in RGGI proceeds collected in the September auction by Connecticut will be returned as rate relief. All RGGI proceeds collected by Connecticut in the final quarterly allowance auction of the year in December 2026 also will be returned to Connecticut ratepayers as rate relief. Under the proposed regulations, if allowance prices remain at similar levels, the expanded CCR will result in greater levels of allowance proceeds to Connecticut starting next year, which would be used to provide additional rate relief, providing further ratepayer protection.

Comment 4. Acadia Center commented that Connecticut should ensure no less than 40 to 50 percent of RGGI proceeds are invested in environmental justice (EJ) communities, with meaningful involvement from community members in investment decisions and transparent tracking and reporting of expenditures. CLF similarly commented that DEEP should direct a minimum investment of RGGI proceeds to energy efficiency, clean energy, clean transportation, and ratepayer relief investments that benefit EJ communities.

Response. DEEP appreciates the comments and is committed to enhancing the quality of life for all Connecticut residents, including by incorporating principles of environmental justice into DEEP's program development, policy making, and regulatory activities. While DEEP does not currently propose any changes to the allocation of Connecticut's RGGI proceeds, Connecticut currently uses RGGI proceeds to support initiatives that provide specific and enhanced benefits to environmental justice and low-income communities. This includes support for CHEAPR's Rebate+, which provides higher clean vehicle rebate levels for low-income residents and residents of EJ communities in Connecticut,¹⁹ as well as funding for Connecticut's C&LM programs, which include programs targeted to benefit low-income participants. The C&LM Home Energy Solutions-Income Eligible (HES-IE) program provides no or low cost energy upgrades such as insulation, air sealing, and heating and cooling system upgrades to qualifying households—those with gross annual income at or below the state's 60 percent income median—to lower household utility bills. In 2025, the average HES-IE participant achieved annual utility savings of \$71 and lifetime saving of \$1,329. RGGI proceeds further were used to fund development of the Connecticut Environmental Justice Screening Tool v. 2.0 with the Connecticut Institute for Resilience and Climate Adaptation (CIRCA) at the University of Connecticut.²⁰ Proceeds also are being used to fund development of the state's first Cumulative Impacts Tool and an updated Connecticut Environmental Justice Screening Tool v. 3.0. In 2022 and 2024,

¹⁸ The final amount will depend on the clearing price in RGGI's remaining auction of the year in December 2026.

¹⁹ See [CHEAPR webpage](#) for more details.

²⁰ See [CIRCA webpage](#) for more details on the EJ Screening Tool.

proceeds were used to fund CIRCA’s Climate and Equity Grant Program, which provided \$174,960 (2022) and \$189,102 (2024) to fund localized climate change adaptation and mitigation education and programs in environmental justice communities across the state. Connecticut’s RGGI ratepayer relief mechanism provides rate relief in the form of a reduction in the public benefits charge for all Eversource and UI ratepayers.

More broadly, DEEP regularly meets and consults with the Connecticut Equity and Environmental Justice Advisory Council (CEEJAC), which is an advisory council to the DEEP Commissioner on issues related to current and historic environmental injustice and inequities across the state, to better integrate environmental justice considerations into DEEP’s programs, policies, and activities, and provide mechanisms for EJ communities to meaningfully participate in decision making. DEEP is committed to and open to future discussions, including with CEEJAC members, environmental justice communities, the Connecticut General Assembly, and others, about potential future uses or changes to the allocation of RGGI proceeds to help achieve just and equitable benefits and outcomes.

Comment 5. One commenter, a renewable energy developer, advocated for allocating RGGI allowance proceeds to performance-based incentives to encourage customers to be active partners in the grid by participating in virtual power plants, rooftop solar, battery storage, smart thermostats, electric vehicles, and other distributed energy resources. The same commenter also advocated for DEEP to create a residential grid services incentive program funded by RGGI dollars.

Response. DEEP appreciates the comment and supports providing opportunities for Connecticut households and businesses to take advantage of technologies and programs that can improve affordability and reliability and reduce emissions. While DEEP does not currently propose any changes to the allocation of Connecticut’s RGGI proceeds, Connecticut’s existing uses of RGGI proceeds enable households and businesses to take advantage of many of the technologies the commenter mentions through funding for investments in energy efficiency, Green Bank project financing, and CHEAPR.

Comment 6. Acadia Center commented that Connecticut should “Offer[] clear, accessible public reporting that connects auction proceeds, program investments, and benefits at the household and community level, ensuring that Connecticut ratepayers understand what RGGI participation costs and what it returns.”

Response. DEEP is committed to accessible, transparent reporting of Connecticut’s RGGI implementation and RGGI-funded investments. Connecticut’s uses of RGGI proceeds are currently documented in the annual [Investment of RGGI Proceeds](#) reports published by Connecticut and the other RGGI states. As noted above, further information on Connecticut’s uses of RGGI proceeds and the programs supported by RGGI funding in Connecticut can be found in annual reports to the legislature from the [Connecticut Green Bank](#) and the state’s [Energy Efficiency Board](#), the [C&LM Plans and Plan Updates](#) filed by Eversource and UI, and the [CHEAPR Statistics](#) webpage.

Clean Energy Development and Siting

Comment 1. Multiple commenters expressed support for RGGI’s contributions to driving clean energy deployments and investments.

Response. DEEP thanks the commenters for their support. In addition to providing funding for energy savings programs, including energy efficiency, clean energy financing, and clean transportation rebates, RGGI’s declining cap and allowance requirements create a market incentive for investments in cleaner and more efficient generation that can help meet Connecticut’s energy and climate goals and provide other benefits.

Comment 2. CBIA expressed concern that the proposed regulations could increase the state’s reliance on renewable energy at a time when new restrictions on siting and development of these resources are being adopted or considered at both the state and federal levels. CBIA stated, “If the state seeks to accelerate the transition to lower-emission generation resources, it must also ensure that sufficient reliable renewable sources and their supporting infrastructure can be developed in a timely, cost-effective, and predictable manner.”

Response. DEEP acknowledges the comment and agrees with the commenter that development of further zero-carbon energy resources in the region in the coming years will be important to achieve additional CO₂ emission reductions needed to meet the RGGI cap as well as Connecticut’s statutory goals for reducing greenhouse gas emissions. Policies and strategies to facilitate further development of new energy resources in the state will be key topics of consideration in Connecticut’s forthcoming [Integrated Resources Plan \(IRP\)](#) and next [Comprehensive Energy Strategy \(CES\)](#), which DEEP is currently developing. Additionally, DEEP and PURA and the other RGGI states have committed to launch their next regional program review of RGGI [no later than 2028](#). This review will consider factors such as changes in energy policy, the pace and scale of electricity load growth, progress in clean energy deployment, and ongoing efforts to ensure energy affordability, and will provide an early opportunity to evaluate the performance of the current updates to RGGI and to make additional adjustments or improvements to the initiative if needed.

Comment 3. Multiple commenters expressed concerns about RGGI’s impact on energy production, including a potential reliance on higher levels of renewable energy. One commenter stated Connecticut cannot rely solely on electric power during storms and fluctuating temperatures, and stated critical infrastructure should not be restricted by the number of carbon credits that are purchased. Another commenter stated Connecticut cannot meet its growing energy needs with wind and solar alone and expressed support for expanding natural gas availability and nuclear energy. One commenter raised concerns about solar supply chains and human rights, including the potential manufacturing of solar panels in China using forced labor.

Response. As a market-based program to reduce CO₂ emissions, RGGI incentivizes cost-effective emission reductions, regardless of technology. In addition to providing an economic incentive for emissions-free renewable energy, RGGI also incentivizes energy efficiency, nuclear generation, and more efficient fossil fuel power plants that generate power with fewer emissions. Connecticut’s RGGI regulations do not require the deployment or use of any specific technology, such as solar power. As an electric sector only program, RGGI also does not create any restrictions or requirements on non-electric

energy uses. Nor does RGGI apply to fossil fuel power plants in Connecticut that are smaller than a minimum threshold of 25 megawatts (MW) in size. While RGGI's emission cap requires regional power sector CO₂ emissions to decline over time, RGGI does not require specific levels of emission reduction at specific facilities, allowing power plant owners and operators to determine the most efficient ways to comply (e.g., by continuing to emit and purchasing allowances or making efficiency upgrades or operational changes to reduce their allowance obligations). Mechanisms like the CCR further are intended to ensure sufficient allowances are available for necessary emissions to ensure a reliable electric supply in the region while the grid transitions to cleaner energy.

Consistency with State Law and Other Issues

Comment 1. Multiple commenters, including EDF, Save the Sound, and Sierra Club, noted the proposed regulations are consistent with the General Assembly's mandate that DEEP adopt regulations to implement RGGI in Connecticut. Several commenters, including CLF, Save the Sound, and Sierra Club, also commented that the additional CO₂ reductions required under the updated RGGI cap will help Connecticut achieve its statutory greenhouse gas emission targets, including the target of achieving a 100 percent greenhouse gas emissions-free power grid by 2040.

Response. As commenters note, DEEP implements RGGI in Connecticut pursuant to the direction of the Connecticut General Assembly, which in CGS Section 22a-200c directs that "The Commissioner of Energy and Environmental Protection shall adopt regulations, in accordance with chapter 54, to implement the Regional Greenhouse Gas Initiative." Adopting the proposed regulations is required for Connecticut to continue to implement RGGI, as the statute directs. By lowering RGGI's cap to achieve additional CO₂ emission reductions from the power sector over the next decade, the proposed regulations also will help make progress toward the statewide greenhouse gas emission reduction levels codified in CGS Section 22a-200a(a), including the General Assembly's direction that "The state shall reduce the level of emissions of greenhouse gas . . . Not later than January 1, 2040, to a level of zero per cent from electricity supplied to electric customers in the state."

Comment 2. Some commenters supported the proposed regulations while also advocating for other clean air or environmental justice policies. Acadia Center commented that Connecticut should do more to improve local air quality, including "Ensuring active air quality monitoring sites within a 3-mile radius of power plants to measure the impact on neighboring communities" and "Stepping up enforcement of air quality monitoring, especially for EJ communities and areas with disproportionately high incidence of asthma located within 3 miles of a RGGI plant." CLF commented that the proposed regulations do not replace the need for limits on criteria air pollutants, facility-specific compliance, or monitoring of local pollution impacts, and that DEEP should pair RGGI with enhanced air quality monitoring and enforcement in environmental justice communities, especially those with RGGI regulated facilities.

Response. DEEP thanks the commenters for their support of the proposed regulations. Alongside RGGI, DEEP continues to implement other air quality programs, including monitoring and enforcement of facility permits and criteria air pollutant standards, consistent with state and federal laws. DEEP operates an ambient air quality network to

assess regional air quality and compliance with national ambient air quality standards. As part of its efforts to engage residents on air quality issues, DEEP also operates a sensor loan program to provide PurpleAir™ sensors to any interested person in Connecticut. Since 2009, when RGGI's CO₂ cap took effect, SO₂ and NO_x emissions from RGGI-covered units in Connecticut have declined by 72 percent and 58 percent, respectfully.

DEEP's Environmental Justice Program further implements CGS Section 22a-20a, which requires certain facilities that would be sited in environmental justice communities to complete early and meaningful engagement with local residents about the facility's permit application and provides DEEP with regulatory authority to place conditions on and deny permit applications for certain facilities that would be sited in environmental justice communities if such facilities would adversely contribute to an already overburdened community. DEEP is currently developing regulations to implement the state legislature's intent under CGS Section 22a-20a to further protect the environmental quality of already burdened communities, including protection of local air quality.

Comment 3. The owner of an environmental consulting company submitted comments supporting the proposed regulations while recommending Connecticut also consider a comparable program to financially reward municipalities and property owners for preserving existing forests and adding additional forest cover. The commenter also advocated avoiding solar siting on forest tracts.

Response. DEEP thanks the commenter for their support of the proposed regulations. Connecticut's implementation of RGGI is pursuant to CGS Section 22a-200c, in which the General Assembly directs "The Commissioner of Energy and Environmental Protection shall adopt regulations, in accordance with chapter 54, to implement the Regional Greenhouse Gas Initiative." Development of a new program proposed by the commenter to financially reward municipalities and property owners for preserving existing forests and adding additional forest cover likely would require new legislation.

With respect to solar siting, RGGI does not specifically require or authorize siting of solar projects in Connecticut or other states. Depending on project size, solar projects in Connecticut may be subject to siting requirements of the relevant municipality or of the Connecticut Siting Council, which may include a demonstration that the project does not materially affect Core Forest. The commenter may be interested to review materials related to DEEP's stakeholder engagement process for [Sustainable, Transparent and Efficient Practices \(STEPs\) for Solar Development](#), which includes an objective to "Avoid, or minimize and mitigate, to the maximum extent practicable, adverse impacts on the environment, agricultural, and natural resources." The commenter also may be interested in the Equitable Distribution of Solar Siting Report DEEP is developing pursuant to [Public Act 26-127](#), An Act Concerning Renewable Power Generation. More information on this report is available on DEEP's Energy Filings webpage under the proceeding titled "[Public Act 26-127 - Section 16 - Equitable Distribution of Solar Siting Report](#)".

Comments and Feedback from Members of the Connecticut General Assembly

Comment 1. Senators Stephen Harding, Henri Martin, Rob Sampson, Paul Cicarella, Jeff Gordon, Eric Berthel, Jason Perillo, Tony Hwang, Ryan Fazio, and Heather Somers submitted joint comments (Joint Senate Republican Comments) raising several questions or concerns, including that the proposed regulations “will make Connecticut’s Unaffordability Crisis even WORSE.” The Joint Senate Republican Comments stated “DEEP should provide a clear explanation of what RGGI costs Connecticut consumers and households. Tell our job creators and ratepayers what RGGI’s yearly price tag is for them.” Senator Gordon also submitted a separate comment “strongly oppos[ing] any proposed changes to the Regional Greenhouse Gas Initiative (RGGI) that would make electricity even more expensive for the people, small businesses, and others in Connecticut.” Senator Gordon further requested that DEEP explain “What RGGI currently costs individual Connecticut consumers and households,” “The total annual cost of RGGI to Connecticut ratepayers,” and “How the proposed changes are expected to affect future electric bills.”

Response. DEEP thanks the Senators for their comments and questions on the proposed updates to Connecticut’s RGGI regulations and is happy to provide additional information on the bipartisan RGGI program that has helped cut CO₂ emissions and other air pollutants in the region, while providing significant rate relief and funding for energy savings initiatives that benefit Connecticut consumers.

As discussed in the [notice of intent](#) and other [regulatory proposal documents](#), and in responses to comments above, the proposed updates to Connecticut’s RGGI regulations, which are required by Connecticut statute, would expand RGGI’s existing ratepayer protections while helping to achieve additional CO₂ emission reductions over the next decade. Adopting these updates is required for Connecticut to continue to participate in RGGI and to continue receiving the benefits of this regional initiative, including tens of millions of dollars in annual funding for rate relief and energy savings initiatives in Connecticut. As further explained below, not adopting these regulations by January 1, 2027, would mean higher electricity bills in the state than if the regulations are adopted.

With respect to the potential costs of the proposed updated RGGI regulations, as discussed in the [fiscal note](#) and above, a bill impact analysis of the proposed updates projected minimal impacts to ratepayers. Across all Connecticut ratepayers, the analysis projected bill impacts ranging from up to 2% in net ratepayer savings (i.e., decrease in cost) per month to a less than half percent increase in cost. For the average residential customer, the projection was between \$1.51 per month in bill savings to a 38 cent per month increase. These potential savings would be accompanied by continued RGGI benefits to Connecticut’s economy, public health, and the climate. Moreover, if Connecticut does not adopt the updated regulations and stops participating in RGGI in 2027, DEEP estimates electricity bills would increase by an average of \$2.53 to \$4.42 per month for Connecticut households next year compared to if the state adopts the proposed regulations.²¹ This is

²¹ This estimate assumes if Connecticut stops participating in RGGI the marginal unit in ISO New England would no longer include RGGI compliance costs in proportion to Connecticut’s 2025 share of RGGI CO₂ emissions in New England (36.8 percent); however, RGGI compliance costs would continue to be reflected in wholesale market prices the remainder of the time. Estimated average monthly costs to Connecticut households are based on a \$35 annualized RGGI allowance price in 2027 (the weighted average allowance price was \$32.46 in RGGI’s first three quarterly

because if Connecticut were to stop participating in RGGI, ratepayers would still pay for the cost of RGGI compliance in other New England states but would no longer receive the benefits of the tens of millions of dollars in annual RGGI allowance proceeds that currently provide ratepayer relief and support energy efficiency and other energy savings investments in Connecticut.

In addition to the benefit of the funds returning to the state, RGGI has provided significant health benefits to Connecticut residents by reducing other air pollutants alongside CO₂. One study found RGGI provided between \$152 million and \$364 million in clean air health benefits to Connecticut over the initiative's first six years alone.²² These benefits include fewer asthma attacks, fewer premature deaths, and fewer lost workdays statewide. Economic studies have also concluded that RGGI provides net economic benefits to participating states, including billions of dollars in enhanced GDP growth and support for thousands of new jobs.²³ As discussed in the fiscal note, an analysis of the proposed RGGI regulations similarly projects net economic benefits from the updates to Connecticut's GDP and jobs. RGGI has already helped cut CO₂ emissions from covered power plants in the region by approximately 47% below 2005 levels. The proposed updates will help make further progress toward emission targets established by the General Assembly in [CGS Section 22a-200a](#).

The data show that Connecticut's RGGI participation is beneficial to the people of Connecticut. It's important to note that as long as the other ISO New England states participate in RGGI—which all of them do—there is no benefit to Connecticut not adopting these regulations and ceasing to participate in RGGI. Because Connecticut is part of a regional energy market, if Connecticut fails to adopt the updates and stops participating, Connecticut ratepayers will still pay for costs of RGGI compliance in the other New England states in the ISO New England market. This is because the costs of RGGI compliance in the other New England states will continue to be embedded in the regional wholesale price of electricity paid by Connecticut ratepayers. However, if these statutorily required updates are not adopted, Connecticut would no longer receive the tens of millions of dollars a year in allowance proceeds that the state returns to ratepayers and that provide broader benefits. In addition to ensuring Connecticut continues to receive these benefits, the updated regulations also significantly expand RGGI's existing cost containment provisions, which will increase protections for Connecticut ratepayers. As discussed above, not adopting these updates would lead to higher electricity bills for Connecticut households and businesses.

auctions of 2026). If average RGGI allowance prices are higher than \$35 in 2027, the estimated cost to Connecticut ratepayers of Connecticut leaving RGGI would be higher than the estimates above.

²² Abt Associates (2017), [Analysis of the Public Health Impacts of the Regional Greenhouse Gas Initiative, 2009–2014: Appendix E: State Level Results](#); see also Abt Associates (2017), [Analysis of the Public Health Impacts of the Regional Greenhouse Gas Initiative, 2009–2014](#); Frederica Perera, David Cooley, Alique Berberian, David Mills, and Patrick Kinney, “Co-Benefits to Children’s Health of the U.S. Regional Greenhouse Gas Initiative,” *Environmental Health Perspectives* 128(7): 77006 (2020).

²³ See, e.g., Analysis Group (2023), [The Economic Impacts of the Regional Greenhouse Gas Initiative on Ten Northeast and Mid-Atlantic States: Review of RGGI’s Fourth Three-Year Compliance Period \(2018-2020\) and Options for RGGI States to Advance Key Equity Priorities](#).

- **Wholesale price effects:** While the region continues to bring new clean energy online, about half of electricity in New England currently comes from natural gas. The marginal generating unit (the final unit needed to meet demand) sets the overall wholesale energy market price in ISO New England and is frequently a natural gas unit. When a fossil fuel unit is on the margin, that unit's cost of RGGI compliance will be reflected in the market clearing price.
- **Contract savings on wholesale energy:** Connecticut's contracts for Millstone and other zero-carbon energy resources insulate Connecticut ratepayers from volatility in fossil fuel prices, which impacts affordability. These contracts also insulate ratepayers from RGGI's wholesale price effects because wholesale market revenues from contracted resources are returned to ratepayers (less contract costs). In 2026, Connecticut's contracts cover approximately 46% of state load, which means the price effects above are offset by almost half. This percentage is anticipated to increase to approximately 51% in the coming months once Revolution Wind is fully online.
- **Ratepayer relief savings:** The ratepayer relief mechanism of Connecticut's RGGI regulations returns any RGGI proceeds above an annual threshold to Connecticut ratepayers. The amount of RGGI proceeds received by Connecticut in any year depends on the clearing prices in RGGI's four quarterly allowance auctions and the number of allowances sold in these auctions. The ratepayer relief threshold increases by 2.5% each year and is just over \$47 million in 2026. Under this mechanism, when allowance prices are higher, a greater percentage and greater overall amount of proceeds are returned to ratepayers as rate relief. PURA returns these funds to ratepayers as a credit that lowers the public benefits charge on bills. In each of the last two years (2024 and 2025), Connecticut sent almost half, more than \$35 million a year, of the state's RGGI proceeds back to Connecticut ratepayers to provide rate relief. In 2026, with higher allowance prices, DEEP estimates approximately two-thirds of proceeds may be returned as rate relief.²⁴
- **Energy efficiency and other program savings:** RGGI proceeds up to the annual ratepayer relief threshold are allocated pursuant to Connecticut's RGGI statute and regulations as follows:
 - 69.5 percent are used to support energy efficiency. The 2025-2027 C&LM plan projects economic benefits to Connecticut of \$3.30 for every \$1 spent on the C&LM efficiency programs. For example, the Home Energy Solutions program provides residential customers with home energy assessments that identify energy upgrades that can reduce their energy bills and provides access to rebates and low-cost financing to implement these upgrades. Common bill-reducing upgrades supported by RGGI funds include air sealing, insulation, smart thermostats, and heating and cooling system upgrades. In recent years, RGGI increased C&LM budgets by about 15.5%, enabling more Connecticut customers to benefit from the programs.

²⁴ The final amount will depend on the clearing price in RGGI's remaining auction of the year in December 2026.

Savings from these programs are both to participating customers and the broader grid as energy efficiency reduces the need for more costly grid investments in transmission, distribution, and generation that all ratepayers would otherwise pay.

- 23 percent are used to support clean energy and clean transportation investments. Of this amount, the first \$5.2 million per fiscal year supports clean energy financing programs at the Connecticut Green Bank, including programs that enable Connecticut businesses, towns, schools, nonprofit organizations, and others to lower their energy bills by adopting solar and other clean energy resources. \$90 million in RGGI proceeds to the Green Bank to date have supported investments that have saved over \$160 million in energy costs, a return of more than \$1.60 in savings for every \$1 spent. The remainder of the 23% supports the CHEAPR program, which provides rebates to Connecticut consumers, particularly low and moderate income residents, to purchase more efficient vehicles and helps Connecticut households and businesses save money at the pump.
- The remaining 7.5 percent is used to cover program administration.

Accounting for the above, the estimated cost of RGGI in 2027 is lower under the updated regulations than under the current regulations in 2026, resulting in Connecticut residential ratepayer savings of 87-91 cents per month on average compared to 2026.²⁵ Savings under the updated regulations are due to expanded ratepayer protections, which generate more allowance proceeds for the state. Under Connecticut's ratepayer relief mechanism these additional proceeds would all be returned to Connecticut ratepayers as rate relief.

Comment 2. The Joint Senate Republican Comments and Senator Gordon's individual comment also raised questions related to DEEP's regulatory process, including ensuring public participation and the role of the General Assembly. The Joint Senate Republican Comments stated "any significant change like this must hinge upon legislative approval before it can become reality." Senator Gordon added "I also ask DEEP to provide greater public notice of these proposed changes and to extend the public comment period, so residents and stakeholders have adequate time to review the proposal and provide meaningful input."

Response. DEEP thanks the Senators for their comments and questions related to DEEP's regulatory process, including ensuring public participation and the role of the General Assembly.

DEEP implements RGGI through regulations adopted in accordance with the General Assembly's mandate in Public Act 07-242 that: "The Commissioner of Energy and

²⁵ This estimate is based on a \$35 annualized RGGI allowance price in both years (the weighted average allowance price was \$32.46 in RGGI's first three quarterly auctions of 2026). However, these results are not meaningfully different at higher allowance prices. For example, comparing a potential \$40 price in 2027 to a \$35 price in 2026, Connecticut residential ratepayers are still estimated to save 83-87 cents per month on average in 2027 compared to under the current regulations in 2026.

Environmental Protection shall adopt regulations, in accordance with chapter 54, to implement the Regional Greenhouse Gas Initiative” ([CGS Section 22a-200c\(a\)](#)). The General Assembly’s Legislative Regulatory Review Committee (LRRRC) first approved the required regulations to implement RGGI in Connecticut in 2008 and has approved amendments twice since then, in 2013 and 2019, as required to continue to implement and participate in RGGI.

In accordance with the Uniform Administrative Procedure Act (UAPA), each iteration of Connecticut’s RGGI regulations has been adopted through a public rulemaking process, which includes public notice and opportunity for public comment, review and approval by the Attorney General, and review and approval by the LRRRC.

The current proposal to amend Connecticut’s RGGI regulations is following this same public process. DEEP issued a public [notice of intent](#) on July 2, 2026, soliciting written public comments on the proposal, which were due August 3, 2026. The notice of intent, proposed regulations, and accompanying materials were posted publicly on the Connecticut eRegulations website (under [Tracking Number PR2025-028](#)), which is the official state portal for proposed regulations, maintained by the Secretary of State. DEEP also held a virtual public hearing to receive oral comments on July 23, 2026, which was attended by over 30 members of the public. Information on the hearing was included in the notice of intent and further shared on the Secretary of State’s [State Agency Public Meeting Calendar](#). Following the hearing, a link to a video recording, meeting minutes, and a copy of the presentation slides were shared publicly on both [eRegulations](#) and the [State Agency Public Meeting Calendar](#). DEEP received 150 public comments on the proposed regulations by the deadline.²⁶

The Department has reviewed these comments, which are posted publicly on eRegulations, prepared the written responses contained herein to the comments received, and, together with its responses to comments, is posting its notice of decision on eRegulations to move forward with the proposed regulations, after considering the feedback received. DEEP’s proposed regulations will need to be reviewed and approved by both the Attorney General and the LRRRC before they can be adopted and take effect.

As DEEP works to adopt the regulatory updates necessary for Connecticut to continue to be able to participate in and benefit from RGGI, the Department also remains committed to continuing to monitor RGGI’s performance and to working with the other participating states to ensure that RGGI continues to contribute to a reliable, affordable, and increasingly clean electricity supply for the state and region. This includes regular regional program reviews in which DEEP and PURA work with the other states and the region’s stakeholders to assess RGGI and develop updates and improvements to the initiative as needed. Connecticut and the other states have [publicly committed](#) to initiating RGGI’s next regional program review no later than 2028, which will provide an opportunity to evaluate the performance of the regulatory updates and to adjust RGGI elements if needed.

²⁶ DEEP shares Senator Gordon’s interest in ensuring opportunities for public participation in the regulatory process. Given the multiple opportunities provided to comment and the substantial level of public comments received, DEEP does not believe it is necessary to extend the public comment period.

Comment 3. Senator Rick Lopes, Rep. John-Michael Parker, and Rep. Jonathan Steinberg submitted joint comments supporting the proposed regulations. The comments noted “RGGI is a multistate commitment to creating a clean energy economy that provides lower energy rates, greater energy efficiency, and overall economic growth,” and Connecticut has “seen tremendous benefits from RGGI participation.” Among these, the comments cited hundreds of millions of dollars in RGGI funding that Connecticut has used to provide direct rate reductions, increased energy efficiency program investment, and accessible clean energy programs in the state; reductions in CO₂ emissions that help meet Connecticut’s ambitious greenhouse gas emission reduction goals; and hundreds of millions of dollars in health benefits from improved air quality, “meaning we are now experiencing significantly fewer premature deaths, heart attacks, and respiratory illnesses.” The comments further noted “To continue generating the benefits derived from the successful RGGI program, Connecticut must periodically update its regulations to conform to the regionally agreed-upon Model Rule. Failing to make these updates, Connecticut will lose funding for necessary affordability programs, and electricity bills will increase.”

Response. DEEP thanks the Senator and Representatives for their comments supporting the proposed updates to Connecticut’s RGGI regulations. As the legislators note, adopting the proposed regulations is required for Connecticut to continue participating in RGGI and to continue the benefits of tens of millions of dollars in RGGI funding that the state uses each year to provide direct rate relief and to support and expand energy savings programs that offer Connecticut ratepayers increased energy options and energy bill savings. Failing to adopt the proposed regulations would mean losing these funds and increased electricity bills in Connecticut. Thus, adopting the proposed regulations is important for energy affordability in the state.

V. Conclusion

Based upon the comments addressed in this Hearing Report, I recommend the proposal be adopted as noticed, and that the final proposal be submitted by the Commissioner for approval by the Attorney General and the Legislative Regulations Review Committee.

/s/ Bruce Ho

Bruce Ho
Hearing Officer

9/11/2026

Date

Appendix A – List of Commenters to PR2025-028

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2	Alexander Rodriguez	54
3	Amanda DeVito Trinsey	161
4	Andrea Gruszecki	25
5	Andrea Simmons	55
6	Andrew May	224
7	Andrew Nunno	210
8	Andy Bauer	10
9	Angelina Cretella	56
10	Annie Perkins	30
11	Anthony Antonucci	187
12	Anthony Lipsi	4
13	Barbara Randi	226
14	Barry Kresch	183
15	Bayard Faithful	19
16	Ben Baker	3
17	Bernard Pelletier	47
18	Brenda Watson	133
19	Brian Campbell	188
20	Caleb Taylor	6
21	Canning Malkin	57
22	Carol Gjellstad	103
23	Cary Lynch	49
24	Cathie Mestemaker-Harris	136
25	Charles Rothenberger	139
26	Chris and Sandra Wanamaker	35
27	Chris Davis	5
28	Chris Schweitzer	31
29	Claire Matthews	58
30	Connor Yakaitis	11
31	Dana Walker	17
32	Daniel T. Crisp	70
33	Daniel Heuer	52
34	David Englert	230

¹ Comment ID number as posted on Connecticut eRegulations for [Tracking Number PR2025-028](#).

35	David Meisinger	66
36	David Michel	185
37	Dean Anderson	24
38	Deb Gryk	38
39	Deb Roe	34
40	Debbie Crosset	59
41	Dennis Desmarais	20
42	Dennis Lockwood	219
43	Dominic Percopo	60
44	Dudley Molina	61
45	Ehren Borg	45
46	Eileen Awsiekiewicz	134
47	Elizabeth Eldridge	62
48	Elizabeth Tuminski	32
49	Elizabeth Vitale	63
50	Emily Dickinson-Adams	64
51	Eric Berthel	126
52	Eunice Mahler	209
53	Gary Borla	65
54	Ginger Chapman	29
55	Heather Somers	126
56	Helen Keegan	218
57	Henri Martin	126
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60	James Flynn	13
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62	Jan McIsaac	223
63	Janet Ainsworth	68
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68	Jeff Benzak	9
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156	Thomas Mariconda	89
157	Tony Hwang	126
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* Denotes commenters who also testified at the July 23, 2026, [public hearing](#) on the proposed regulations.