

April 16, 2020

To:
Michael Powell and Kim Coble
Co-Chairs
Maryland Commission on Climate Change Mitigation Working Group

CC:
Chris Hoagland
Program Manager
Climate Division
Maryland Department of the Environment

RE: Greenhouse Gas Reduction Act Modeling - Mitigation Working Group Model Run

Members of the Mitigation Working Group,

We appreciate the opportunity to provide recommendations for an additional model run associated with the Maryland Department of the Environment's (MDE) Greenhouse Gas Reduction Act (GGRA) planning process. To initiate the discussion, we have provided a series of policy proposals and input recommendations. The proposals and recommendations below do not necessarily represent official policy positions of the signatory groups but are intended to help initiate and engage the MWG modeling discussion.

To frame our recommendations we utilized the structure used on pages 12 - 13 of the MDE's Appendix F of the GGRA Draft Plan.

Policy scenario details to prioritize in MWG model run

Policy Areas	MWG Model Run
RPS	25% x 2020 50% x 2030 Zero emissions electricity by 2040 with at least 75% attributed to clean, renewable energy sources like wind and solar
RGGI	Beginning in 2023, accelerate the carbon cap to achieve 50% reductions (relative to 2020 cap) by 2030 and then 100% cap reduction by 2040 Also ensure other RGGI states' clean energy and climate policies are fully reflected in the modeling, including the recently enacted Virginia Clean Energy Act

Existing Coal	All in-state coal-fired power plants are phased out by 2030
New Gas Power Plants	A moratorium on new
Rooftop PV	Double the existing net metering cap to reach 3000 MW by 2030
Energy Efficiency (Res. Com. Industrial)	Increase annual savings targets for electric efficiency and conservation programs to 3% annual rate savings for electricity starting in next EmPOWER cycle (2023)
Electrification of buildings (e.g. NG furnace to heat pumps)	Implement an all-electric standard for new buildings by 2025 (no new gas hookups) Residential heat pump retrofit deployment -- 400,000 electric heat pump deployment by 2030, 800,000 by 2040, 1.2 million by 2050
Fuel Economy Standards	Federal CAFE standards for LDVs through 2026, with continued annual improvement beyond 2026 at at least the same rate
ZEV in Light Duty	Aggressive sales after 2025 (800,000 by 2030, 5 Million by 2050), including an all-electric state-fleet requirement beginning in 2022 for contracts of purchases and leases to be electric only, excluding emergency vehicles.
Heavy Duty Vehicles	Aggressive sales of electric and diesel hybrid HDVs after 2030 (40% new sales of either combined electric vehicle and diesel hybrid, full electric, or other zero-emissions vehicles by 2030 and 95% by 2050 by assuming aggressive ZEV adoption); truck stop electrification and zero-emission truck corridors
VMT	0.6% growth ¹ : Additional smart growth and transit measures
Other Transp. Sectors (e.g. buses, construction vehicles)	Electrification of 70% of transit buses by 2030, 100% by 2035; Electrification of 50% of construction vehicles by 2040, 100% by 2050
TCI	An emissions cap of at least 25% below projected 2022 levels by 2032
Industrial Energy Use	30% reduction below Reference Scenario by 2050
Biofuels	Existing ethanol and biodiesel blends

¹ Based on LDV data from US Energy Information Administration available here: <https://www.eia.gov/outlooks/aeo/data/browser/#/?id=7-AEO2020&cases=ref2020&sourcekey=0>

Other (fossil fuel industry, industrial processes, agriculture, waste mgmt, forestry)	<p>Reductions in enteric fermentation of 16% below 2014 levels by 2030, and reductions in manure management of 65% below 2014 levels by 2030</p> <p>Recycling and composting rates -- need to identify the right rates</p> <p>Grow forestry sinks by 10% by 2030</p>
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We appreciate the opportunity to provide this feedback and series of recommendations for the MWG modeling opportunity, and we look forward to working with the full MWG and the MDE to finalize a model run for this phase of the GGRA planning process.

Sincerely,

Bruce Ho
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Natural Resources Defense Council

Josh Kurtz
Director of Policy Development
The Nature Conservancy

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