

ADOBE et al.



April 9, 2018

Director David Paylor
Virginia Department of Environmental Quality
629 East Main Street
Richmond, VA 23216

RE: Business Support for Proposed Carbon Reduction Plan, “Regulation for Emissions Trading”

Dear Director Paylor:

As businesses with operations, investments, and employees in Virginia, we write in support of the Virginia Department of Environmental Quality’s (DEQ) proposed regulation to reduce carbon emissions from the electricity sector.

Businesses and investors understand both the importance of reducing carbon pollution and the opportunities provided by clean energy. Half of Fortune 500 companies and 63 percent of the Fortune 100 have set goals to reduce greenhouse gas emissions and increase their use of clean energy because it makes business sense.¹ Clean energy allows us to save money, hedge against volatile fossil fuel prices, and lock in predictable energy prices.

Market-based carbon-reduction initiatives have proven to be highly effective in reducing electric-sector greenhouse gas emissions while fostering economic growth and spurring innovation in clean energy technology.² We recognize the importance of strong, stable policies that aim to account for the cost of carbon emissions and provide market certainty, allowing businesses to plan and invest for the future. In Virginia, the proposed carbon reduction program would incentivize additional private-sector investment in renewable energy and energy efficiency—creating good-paying jobs and making the Commonwealth an even more attractive place to do business.

Furthermore, the proposed carbon reduction regulation will be beneficial for Virginia’s economy as a whole. This smart initiative will grow Virginia’s own nascent clean energy industry, help the Commonwealth stay competitive, reduce overall energy costs, and improve the resiliency of our electrical grid. It will also help utilities transition to a cleaner electric grid while hopefully offering more options for businesses and residents to access cost-competitive renewable energy.

Our businesses value an affordable, reliable, and clean electricity supply, and we commend the Northam Administration for its commitment to lead Virginia in the transition to a low-carbon economy. We appreciate the many months of compiled research and feedback the previous administration gathered from the business community, utilities, and other energy stakeholders to develop forward-thinking carbon reduction measures.

¹ Ceres. *Power Forward 3.0: How the largest U.S. companies are capturing business value while addressing climate change*. April 2017. <https://www.ceres.org/resources/reports/power-forward-3>

² From 2008-2015, the nine states participating in the Regional Greenhouse Gas Initiative (RGG) experienced CO2 emissions falling 16 percent more than the rest of the country, while the region’s economy grew 3.4 percent more than other states and retail electricity prices dropped 3.4% across the region. See: Acadia Center. *Regional Greenhouse Gas Initiative Status Report: Part I: Measuring Success*. July 2016. <http://acadiacenter.org/document/measuring-rggi-success>

Steady carbon reduction policies will signal that Virginia is committed to embracing clean energy innovation, allowing businesses like ours to thrive for years to come.

Thank you for your leadership in fostering a clean energy economy in Virginia.

Sincerely,

Adobe
IKEA NA Services, LLC.
JLL
Mars Incorporated
Nestlé
Unilever
Worthen Industries

CC:

Governor Ralph S. Northam
Lieutenant Governor Justin Fairfax
Secretary of Natural Resources Matt Strickler
Deputy Secretary of Natural Resources Angela Navarro
Michael Dowd, Director of Air and Renewable Energy, Virginia DEQ
Virginia Senate Commerce and Labor Committee
Virginia House Commerce and Labor Committee

To learn more or contact the business signatories listed above, please contact esteves@ceres.org.