

Allowances An allowance is essentially a “permit” to release a ton of carbon pollution from a power plant under a mass-based approach. States that want to enable mass-based trading distribute one *allowance* for every ton of carbon pollution allowed under state-specific limits annually. Coal and gas plant owners need to acquire enough allowances for *all* of their pollution. How allowances are distributed is an important question, and there’s flexibility. For example, allowances could be given to power companies for free – or allowances could be sold in an auction, creating funds that could be used to benefit impacted communities, workers, consumers, energy efficiency, clean energy or other priorities.

Set-asides One option a state using a mass-based approach can consider when it comes to distributing allowances is to *set aside* a certain number of allowances for a specific goal. For example, some allowances could be given directly to energy efficiency providers and clean energy developers to sell in order to raise funds for energy efficiency and clean energy projects.

Leakage It doesn’t sound good, does it? Consider this scenario: generation at an existing coal plant is reduced to meet mass-based carbon pollution limits, but its generation is replaced by a *new* gas plant whose carbon pollution isn’t covered under Clean Power Plan limits. That’s *emissions leakage* – situations where Clean Power Plan carbon reduction goals might be undermined. That’s why states with mass-based plans must clearly address any emissions leakage potential. One option is for the state to include both existing and new power plants together in a mass-based compliance plan.

Clean Energy Incentive Program (CEIP) The Clean Power Plan allows renewables and energy efficiency projects to earn ERCs or allowances for carbon pollution they offset in 2022 and beyond. The optional *Clean Energy Incentive Program (CEIP)* provides further clean energy encouragement by enabling some energy efficiency, solar and wind projects to also earn ERCs or allowances for carbon reductions in 2020-2021. For energy efficiency projects to qualify, they need to serve low-income communities – and both efficiency and renewables projects must begin after a final state compliance plan is submitted. There is a special bonus: some of the credits/allowances for CEIP-eligible projects will come from a pool set aside by EPA that matches those from the state, and low-income energy efficiency gets double credit. A state has to *opt into* the CEIP.

Evaluation, Measurement & Verification (EM&V) *EM&V* is the way that projects like energy efficiency or clean energy prove the zero-emissions energy they’re producing that qualifies for ERCs or CEIP credits/allowances. It includes both an up-front plan for measurement and independent verification, and then a measurement and verification report after the project has been operating for a year.

Trading ready If a state writes a *trading ready* plan, power plant owners in the state can obtain ERCs or allowances from another trading ready state for compliance (and vice versa), which may lower costs. A state plan is trading ready if it meets certain basic requirements, such as an EPA-approved tracking system.

Federal Plan EPA reviews state plans for approval. If a plan is inadequate or if a state fails to adopt a plan, then EPA must implement a *federal plan* for the state.

State clean energy policies (RPS & EERS) State-level policies on clean energy and energy efficiency are also important as part of Clean Power Plan discussions, as they spur pollution-free energy that supports low-cost compliance with the carbon standards as well as economic development. These include policies like *Renewable Portfolio Standards (RPS)* that require clean energy be used for a certain portion of utilities’ generation – and *Energy Efficiency Resource Standards (EERS)* that require utilities to deploy energy efficiency programs for customers, saving energy and money.