## The Magic of 100%: Renewable Electricity Standards as Climate Change Policy Vanguards

In 2015, Hawai'i adopted a 100% renewable portfolio standard ("RPS") for its regulated electricity sector. From 2018 to 2021 fourteen additional states and territories implemented similar clean electricity standards. As a result, more than thirty percent of residential and commercial electricity customers in the United States are now covered by statutory commitments to decarbonize the electricity sector. An additional ten percent of customers are covered by statewide regulatory or executive orders implementing similar commitments. This trend is not entirely surprising. The electricity sector accounts for nearly one-third of the nation's greenhouse gas emissions, and prescriptive regulation can readily exert direct and significant power over the emissions of regulated electric utilities, unlike some other sectors of the economy. Moreover, 100% clean electricity mandates enjoy support from a bipartisan national majority of voters—providing a dose of climate optimism during this era of political polarization.

In this light, it is sensible that decarbonization efforts gained a relatively early foothold in the electricity sector. That early foothold can pay dividends as decarbonization accelerates in other sectors. For example, decarbonized electricity is a necessary precursor for current plans to decarbonize the transportation sector via electrification. 100% clean electricity targets can also serve an important normative role in broader efforts to implement economy-wide decarbonization. Because of this role, it is valuable to examine the details of how these policies have been constructed. Most importantly, these clean electricity "mandates" are not as prescriptive as many assume. Rather, they tend to be constructed using less direct policy tools, such as: (i) transparency; (ii) burden-shifting; and (iii) normative influence. The success of these tools in the sphere of electricity suggests that climate change policy in other sectors, including economy-wide decarbonization targets, should consider deploying similar strategies.

Richard Wallsgrove, Assistant Professor of Law William S. Richardson School of Law, University of Hawai'i at Mānoa