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INDEPENDENT REGULATORY REVIEW COMMISSION

Oral Testimony from Andrew R. Wolfe, President/Financial Secretary IBEW Local 1600

Good afternoon, my name is Andy Wolfe, I'm President/Financial Secretary for IBEW(International Brotherhood of Electrical Workers) Local 1600 in Trexlertown, Pa.. I represent 3667 members who are employed by PPL, Comcast Cable, Ephrata Borough and the Sunbury Power Plant.

I'm here today to comment on the Pennsylvania's state - specific mercury reduction rule. First, IBEW Local 1600 supports reductions in mercury emissions. The issue is not whether to reduce emissions, but how. We believe good public policy takes into account protection of the environment, protection of public health and protection of jobs so that working Pennsylvanians and their families are not threatened by unemployment and poverty.

The IBEW is part of a broad coalition of labor unions, coal producers, electricity consumers and power plant owners supporting the federal government's Clean Air Mercury Rule, combined with the Clean Air Interstate Rule (with interstae trading), as a better way to achieve real and significant mercury reductions without placing thousands of jobs at risk, and thousands of families in jeopardy. Labor members of the coalition include the International Brotherhood of Electrical Workers, the Untied Mine Workers of America and the Pennsylvania Conference of Teamsters.

Currently IBEW Local 1600 has approximately 700 members working at the Sunbury Power Plant, Brunner Island Power plant, Montour power plant and Martins Creek power Plant. If the DEP continues to move forward on the proposed mercury reduction rule, the members working at these power plants will certainly be negatively impacted. Regulation must help both the environment and the economy. DEP's efforts will put Pennsylvania's industry and consumers at a disadvantage without any measurable improvements in public health or the environment. Surely a rule that would have such profound impacts on the economy and quality of life in Pennsylvania should at least produce benefits for Pennsylvanians that match or outweigh the costs. The DEP has not been able to produce any credible evidence that a state-specific rule will achieve any additional benefits beyond the federal rule.

As I said before IBEW Local 1600 supporting the Federal rule on mercury reductions for the following reasons:

- It allows emission trading, which provides a strong incentive for generators to reduce emissions more than and sooner than required.
- It does not disadvantage Pennsylvania coal, which contains more mercury than coal from other states.
- It does not jeopardize coal mining or power generation jobs in the state that could be at risk if generators have to start using coal from other states to meet the requirements of the proposed regulation, or if smaller, older plants were forced into premature retirement.

In closing, on behalf of the members of IBEW Local 1600, I would like to thank the Environmental Quality Board for allowing this local union the time to raise issues and concerns with Pennsylvania's State-specific mercury reduction rule.