

**Stephen Hoffman**

From: ecomment@pa.gov
Sent: Sunday, January 3, 2021 2:51 PM
To: Environment-Committee@pasenate.com; IRRC; environmentalcommittee@pahouse.net; regcomments@pa.gov; ntroutman@pasen.gov; timothy.collins@pasenate.com; gking@pahousegop.com; siversen@pahouse.net
Cc: c-jflanaga@pa.gov
Subject: Comment received - Proposed Rulemaking: CO2 Budget Trading Program (#7-559)

CAUTION: **EXTERNAL SENDER** This email originated from outside of the organization. Do not click links or open attachments unless you recognize the sender and know the content is safe.

**Re: eComment System****The Department of Environmental Protection has received the following comments on Proposed Rulemaking: CO2 Budget Trading Program (#7-559).**

Commenter Information:

David Hall
(dabahall0708@gmail.com)
460 Tahoe Drive
Plum, PA 15239 US

Comments entered:

Thank you for allowing public comments.

I believe the RGGI could be of benefit to Pennsylvania if done thoughtfully and with careful consideration of all the technologies involved and the impact to the existing power generation and distribution infrastructure. Those within the state government need to consider that Pennsylvania is different from the other states already in the RGGI. PA already gets more its electric power from non carbon-emitting nuclear power plants than some of the other states in the RGGI. PA also has more capability for river based hydro-electric power generation at existing locks and dams than some of the other states in the RGGI. To those of us outside government it seems that to government officials reducing greenhouse gasses often means funding only wind and solar technology to the exclusion of other technology. Wind and solar technology will have a place in the future of power generation but they are both intermittent power generators that are not highly resilient. Solar doesn't work at night and the wind doesn't always blow. The recent snowstorms in PA would have knocked solar generation off line for days as the solar panels would be covered with snow. Energy storage technology embedded in the electricity infrastructure can help somewhat, but the proposed rules do not mention energy storage technology. I would ask that you consider adding energy storage technology to be encouraged with the strategic set aside. Wind and solar won't work without it.

I would also ask that you specifically mention technologies other than wind and solar. River based hydro power at existing locks and dams has minimal environmental impact since the dams already exist. Such power generation is continuous and more resilient than wind or solar. Western PA is blessed with an abundance of water and hills so pumped hydro energy storage is also a possible technology for us. Nuclear power generation is also carbon free, continuous, and resilient. Please don't rule it out. Especially since a designer of nuclear power plant technology is located within the state of PA. Buy local over out of state and buy domestic over offshore.

Lastly I urge those involved in the PA RGGI initiative to read an article in the December 2020 issue of the IEEE Spectrum called "Energiewende, 20 Years Later" that describes the government program in Germany to reduce carbon emissions. The Germans succeeded in reducing carbon emissions from power generation over 20 years. The average German also pays about triple what the average American pay for electricity. The US reduced carbon emissions from power generation over the same period by almost the same amount as Germany. Americans still pay much less for electricity. Carbon emission from power generation might be able to be reduced without large increases in electricity prices if it is done carefully and with the right mix of technology (not just wind and solar).

Thanks for your consideration.

No attachments were included as part of this comment.

Please contact me if you have any questions.

Sincerely,
Jessica Shirley

Jessica Shirley
Director, Office of Policy
PA Department of Environmental Protection
Rachel Carson State Office Building
P.O. Box 2063
Harrisburg, PA 17105-2063
Office: 717-783-8727
Fax: 717-783-8926
ecomment@pa.gov