



## Stephen Hoffman

**From:** ecomment@pa.gov  
**Sent:** Monday, January 4, 2021 5:14 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-jflanagan@pa.gov  
**Subject:** Comment received - Proposed Rulemaking: CO2 Budget Trading Program (#7-559)

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The enclosed comment was received as part of the following testimony:

**Testimony name:** Public Hearing 8 (1pm) - #7-559  
**Testimony date:** 12/11/2020 12:00:00 AM  
**Testimony location:** WebEx

### Re: eComment System

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

Commenter Information:

Aric Baker  
 IBEW Local 459, Keystone Generation Station (aricibew459@gmail.com)  
 166 Crimm Rd  
 Ford City, PA 16226 US

Comments entered:

I am an emission controls technician at the Keystone Generating facility located in Armstrong County, PA where I have worked for almost 20 years. I actually maintain and calibrate the equipment that is used to monitor all of the plant's emissions, this equipment is used to tune the boilers making the plant operate at the highest level of efficiency possible while also reporting to the EPA to ensure 100% compliance of all emission regulations. I've seen first hand the level of commitment and the money these plants have spent in recent years on striving to be good environmental stewards. It is very disheartening to see the governor impose this tax on my powerhouse that I proudly help operate and on the very same company that supports many of my friends and families by providing family sustaining income with both direct and indirect employment.

I have been following this process from the beginning and actually volunteered to be part of the ongoing discussions throughout the process by being a voice for my fellow union members at various meetings including 2 with the governor and his staff. The governor promised us public

input on this matter but to date this mediocre at best virtual hearing at which those impacted have very little ability to participate in is all that has been done even though the governor has been personally invited several times to come and visit these state of the art plants and speak with the workers along with the impacted communities. The Armstrong county school district, which is where I reside, pay taxes and my children attend school is already deemed poverty level without the added economic devastation that will come with the RGGI tax which will cause the closure of these plants. The outfall from these generating stations shuttering is immeasurable due to the fact of the untold number of ancillary jobs and companies which they support. Knowing that the actual environmental benefit from this will be negligible due to the fact the lost generation in PA will be picked up by fossil fuel plants in neighboring states who do not participate in the RGGI program thus causing "leakage".

This leakage issue is not just a theory but is actually guaranteed to happen due to the fact that the PJM interconnection requires fossil fuel generation for real reactive power during load swings and that voltage regulation can only be achieved by fossil fuel generators. This has been proven over and over again thru the years, so without large baseloading plants available to modulate and regulate the grid will fail, welcome to California except here it will be devastating during sub zero temperatures when cities go black. The true fallacy of the leakage issue is the fact that the plants in Ohio and WV which will become those baseloading plants ,some of which were slated for closure, actually operate at a higher heat rate thus they will create more CO2 to generate the same amount of electricity.

There is a reason that the plants still in operation in PA are still operating, they are the best of the best, most efficient and most reliable. So ask yourself, are we saving the planet by causing the closure of world class plants prematurely only to have less advanced plants run more? Also something that is not known widely or advertised is the fact that these plants along with the waste coal plants are helping clean up groundwater by burning refuse coal that has been reclaimed from spoils piles left from old mining operations, if these plants shutter the cost of cleaning up these refuse piles will fall on the government and taxpayers. Because of the advanced water treatment on site of these plants the water downstream is actually healthier then the water upstream from these plants, on a side note some of the best trout fishing in Armstrong county is just downstream from Keystone generating station. Given the current pandemic already wreaking havoc on our jobs and economy in PA I am requesting that all involved pull back on the RGGI legislation and help us keep Pennsylvania strong by retaining our title as an energy exporter and revenue importer. I appreciate being given the opportunity to address this matter.

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No attachments were included as part of this comment.

Please contact me if you have any questions.

Sincerely,  
Jessica Shirley

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