Stephen Hoffman

From: ecomment@pa.gov

Sent: Wednesday, January 6, 2021 10:58 AM

To: Environment-Committee@pasenate.com; IRRC; environmentalcommittee@pahouse.net;

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gking@pahousegop.com; siversen@pahouse.net

Cc: c-jflanaga@pa.gov

Subject: Comment received - Proposed Rulemaking: CO2 Budget Trading Program (#7-559)

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Re: eComment System

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

Commenter Information:

Alex Baloga PFMA (abaloga@pfma.net) 1029 Mumma Road PO Box 870 Camp Hill, PA 17001 US

Comments entered:

The Pennsylvania Food Merchants Association is a statewide trade association advocating the views of convenience stores, supermarkets, independent grocers, wholesalers, and consumer product vendors operating in Pennsylvania. We represent more than 800 corporate members who operate more than 3,500 retail food stores and employ more than 250,000 Pennsylvanians.

The association wishes to outline its concerns regarding the proposed rulemaking bringing Pennsylvania into the Regional Greenhouse Gas Initiative and the establishment of a carbon tax on electricity production.

In short, PFMA members believe carbon emissions trading does not benefit Pennsylvania consumers. In fact, the practice would do real and immediate harm to residents, as carbon retailers are forced to pass on the increased costs of purchasing carbon credits.

Further, incentivizing non-carbon transportation would mean less revenue from the state's fuel tax. As the primary source of funds for infrastructure repair this would, if taken alone, significantly impact the commonwealth's ability to repair and maintain the transportation networks upon which so many Pennsylvanian livelihoods depend. A disproportionate burden would also be placed on those remaining users of carbon-based fuels.

PFMA appreciates the seriousness posed by a changing climate, and many of its members stand at the forefront of implementing green energy and other sustainability efforts in the commonwealth. However, at a time when the economy is under such unprecedented strain, this rulemaking would have a negative impact on revenues generated by natural gas and carbon retailers which in turn would have a profoundly negative impact on tax revenues for the state, with far-reaching consequences for residents.

No attachments were included as part of this comment.

Please contact me if you have any questions.

Sincerely, Jessica Shirley

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