



## Stephen Hoffman

**From:** ecomment@pa.gov  
**Sent:** Wednesday, January 6, 2021 8:56 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)

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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:

James H. Dalton, Jr.  
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Comments entered:

Dear Members of the Environmental Quality Board,

I am writing to support Pennsylvania's participation in the Regional Greenhouse Gas Initiative (RGGI), and to urge your approval of regulations to implement Pennsylvania participation in RGGI.

As you know, the PA Dept. of Environmental Protection authorized a systematic study of the expected effects of the RGGI plan for the next 10 years in PA. That study predicted that RGGI would:

- Decrease PA emissions of greenhouse gases due to production of electricity by 35% - more than would happen without RGGI.
- Contribute up to \$2 billion to the PA economy.
- Create a net gain of about 27,000 jobs – 27,000 more jobs than would be lost as RGGI changes how PA produces electricity.
- Keep PA's overall electricity production about the same as now; PA will remain the leading producer of electricity in the region, and remain an electricity exporter. (Other research cited by State Impact PA supports this.)
- Shift production of electricity to renewable energy, natural gas and nuclear power; production with coal will drop sharply.

- Lead to wholesale electricity prices about 5% higher than without RGGI.
- Save roughly \$6 billion in measurable health costs, especially reducing severity and costs of treatment for respiratory illnesses.
- Prevent about 600 premature deaths from those illnesses.

Key takeaways of these and other studies of RGGI include:

- The RGGI approach - setting a price on carbon, and investing in programs to reduce emissions and increase energy efficiency - is essential for addressing climate change effectively.
- Market forces alone are not enough. Research on RGGI in other states (cited in coverage by State Impact PA) found that about half of reductions in carbon emissions were directly due to RGGI, and that emissions dropped sharply after implementation of RGGI.
- The Governor's RGGI plan for PA participation would reduce carbon emissions in PA by significant amounts. The experience of other RGGI states shows that these goals are attainable.
- As proposed for PA, RGGI is a useful compromise - it will rely on renewable energy, natural gas and nuclear power to produce electricity with lower emissions.
- Income from the carbon-allowance auctions under RGGI can be used to drive further reductions in carbon emissions, by support for development of renewable energy, energy efficiency and conservation, and other innovations.
- RGGI is predicted to reduce health care costs and premature deaths.
- RGGI will have economic costs and gains. The DEP study predicts gains will more than offset losses.
- Job gains due to RGGI are predicted to exceed job losses. PA is predicted to retain its current level of energy production and still be an energy exporter.
- The DEP study predicts that electricity costs will rise about 5% statewide, but that does not include external environmental costs not measured in electricity bills. The environmental benefits of RGGI would help mitigate those, helping to offset higher electricity bills.
- Short-term adverse economic effects of RGGI on PA communities need to be addressed. Income from RGGI auctions could be used to fund job training programs for affected workers.

The PA state constitution guarantees PA citizens the right to clean air, pure water and a stable environment. The RGGI plan will bring PA much closer to fulfilling that guarantee.

James H. Dalton, Jr.

Sources:

PA Department of Environmental Protection study of RGGI effects:  
[www.dep.pa.gov/Citizens/climate/Pages/RGGI.aspx](http://www.dep.pa.gov/Citizens/climate/Pages/RGGI.aspx)

StateImpact PA: [stateimpact.npr.org/pennsylvania/](http://stateimpact.npr.org/pennsylvania/)

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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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