



**Stephen Hoffman**

**From:** ecomment@pa.gov  
**Sent:** Thursday, January 7, 2021 8:52 AM  
**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:

Joshua Silvis  
(joshuasilvis@consolenergy.com)  
2696 Locust Drive  
Pittsburgh, PA 15241 US

Comments entered:

Opposed to Proposed Rulemaking CO2 Budget Trading Program

Dear :

To Whom It May Concern: I write in opposition to Governor Tom Wolf's proposed regulation, CO2 Budget Trading Program as published in the Pennsylvania Bulletin on November 7, 2020 (50. Pa.B. 6212), which would establish a program to limit the emissions of carbon dioxide from fossil-fuel fired electric generating units (EGUs) and join Pennsylvania to the Regional Greenhouse Gas Initiative (RGGI). I urge the Independent Regulatory Review Commission (IRRC) to reject Governor Wolf's proposed RGGI tax. I am a coal mine hydrologist and have been employed by the industry (CONSOL Energy, Inc.) since September 2005. Over these fifteen years of professional experience, I have developed a specific skillset consisting of hydrologic, geomechanical and geochemical principles. This skillset is leveraged to devise strategies to overcome significant water resource management problems and minimize environmental impact associated with active mining and other legacy, closed mine properties that require perpetual treatment obligation. Joining RGGI will trigger the near immediate closure of Pennsylvania's coal EGUs, resulting in the loss of thousands of direct jobs (including possibly mine), negative impacts to secondary industries that support the plants, the erosion of income and property tax revenues, and increased power prices that will burden consumers and

businesses. For what reason? In 2018, carbon dioxide emissions from fossil-fuel fired EGU's were 33.2 percent below 2005 emission levels. This reduction is well in advance of Governor Wolf's stated 2025 goal of 26 percent below 2005 levels. Moreover, these reductions have been accomplished while Pennsylvania has maintained a stable and reliable supply of electricity at competitively priced rates, significantly below those of RGGI states. This can be attributed to the fact that over 95 percent of Pennsylvania's energy generation comes from in-state low cost generation sources – including coal, natural gas, and nuclear. However, promulgation of this proposed rulemaking would radically and irresponsibly alter the states' energy generation portfolio resulting in increased costs for electric ratepayers, and significant negative economic impacts in communities throughout Pennsylvania. However, the economic devastation resulting from the closure of these plants does not lead to a significant reduction in carbon dioxide emissions if the rule is promulgated as written. Prior to consideration of the proposed rulemaking package by the IRRC, many of these potential negative economic consequences and shortfalls of the proposal were considered and discussed by three specific Pennsylvania Department of Environmental Protection advisory committees. All three advisory boards, including the Air Quality Technical Advisory Committee, the Citizens Advisory Council, and the Small Business Compliance Advisory Committee, rejected the proposed rulemaking. Despite failing to achieve agreement from a single advisory committee, and the overwhelming, bipartisan opposition of the Pennsylvania General Assembly, Governor Wolf continues to unilaterally advance the proposed regulation. The proposed regulation represents a statutorily unauthorized attempt to institute a tax on carbon dioxide emissions from fossil-fuel fired EGUs, and it does not reflect the intent of the Pennsylvania General Assembly. Additionally, the proposed regulation will impose extraordinary hardships on impacted employees, local communities with affected EGUs, and consumers seeking a reliable and affordable supply of electricity. All of which is additive to the affects already experienced by our industry. For these reasons I urge the IRRC to reject the proposed regulation. Thank you for the opportunity to comment.

Best regards,

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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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