



Stephen Hoffman

From: ecomment@pa.gov
Sent: Wednesday, January 6, 2021 8:56 PM
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Cc: c-jflanaga@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:

Maria Korsnick
 Nuclear Energy Institute (mgk@nei.org)
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Comments entered:

I am Maria Korsnick, President of the Nuclear Energy Institute. I am proud to represent this industry and excited about the role nuclear power plays in Pennsylvania and the nation. NEI supports the Department of Environmental Protection's proposal to join the Regional Greenhouse Gas Initiative as it will better recognize the role of Pennsylvania's nuclear power plants as part of a portfolio of technologies that can meet the Commonwealth's energy needs. RGGI is a market-based approach to reflect a portion of the value of carbon-free electricity in prices that are clear to all generating technologies. The Department should seek to join RGGI by 2022 to allow companies in the state to make the strategic decisions necessary to preserve carbon-free generation that might otherwise face the risk of closure. Nuclear energy is, by far, the largest source of carbon-free electricity generation in Pennsylvania. The state's four nuclear power stations provided over 90 percent of Pennsylvania's carbon-free electricity last year. These power plants operate 24 hours a day, providing reliable baseload electricity regardless of the weather conditions and without fuel supply interruptions.

In spite of nuclear energy's importance to Pennsylvania, many nuclear power plants in the state face an uncertain future. Wholesale power prices have fallen so precipitously in recent years that even well-run plants can face the prospect of permanent closure. This is not a distant or hypothetical concern – Pennsylvania has seen this play out over the last two years. In 2019, the Three Mile Island Nuclear Generating Station ceased operations. The Beaver Valley Nuclear Power Station in Western Pennsylvania was scheduled to close, only to reverse that decision in response to Governor Wolf's statement that Pennsylvania intends to join RGGI.

These are not isolated cases. Nuclear plants in neighboring states have seen closure announcements in recent years. Those plants that did not close were able to continue operating because of state policy actions that value the carbon-free or reliability attributes that nuclear energy provides.

These states recognized the need to act before plants were closed. Unlike other facilities, nuclear power plants cannot be mothballed and later returned to service. Once a nuclear plant closes, it is gone for good.

As the case of Three Mile Island shows, not all of these plants have avoided early retirement and the economic impact of these closures can be devastating to local economies. When the Kewaunee Plant in Wisconsin closed in 2013, the host town of Carlton lost 70 percent of its I have spent over 30 years in the nuclear industry operating and managing these plants. I have lived in the communities that proudly support these plants. I know these plants are vital parts of their communities and the region's infrastructure.

Pennsylvania's nuclear power stations directly employ over 4,500 full-time workers and support thousands of additional indirect jobs. These are well-paying careers that anchor local economies. Refueling outages occur every 18 to 24 months and these outages give an economic jolt to these communities by bringing in hundreds of trades-union technicians to perform specialized tasks over several weeks and generate revenue for the hospitality and other industries in those areas. The investments made in these nuclear plants have resulted in excellent performance. The cost to generate nuclear electricity has fallen 32 percent since 2012 – with improved safety performance. In all, the economic challenges facing Pennsylvania's nuclear plants say less about the plants and more about the market in which they operate.

As Pennsylvania plans for lower carbon emissions from its electricity generation while maintaining its exporter status, the state's nuclear plants offer a strong partnership with renewable technologies such as wind and solar. The always-on nature of nuclear generation provides a valuable complement to the more variable output of wind and solar. Pennsylvania's participation in RGGI will provide a clear, market-based signal that the carbon-free attribute of all generating technologies is valuable to the state's future.

No attachments were included as part of this comment.

Please contact me if you have any questions.

Sincerely,
Jessica Shirley

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