



Pennsylvania Department of Environmental Protection
Hearing on Proposed Rulemaking on Participation in the Regional Greenhouse
Gas Initiative (RGGI)

December 14, 2020

Testimony of Vincent J. Brisini

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Good afternoon, my name is Vince Brisini, spelled BRISINI.

I'm the Director of Environmental Affairs for Olympus Power and a former Deputy Secretary for Waste, Air, Radiation and Remediation. I'm testifying on behalf of Olympus Power and myself, a lifelong resident Cambria County Pennsylvania.

Based upon my analyses, it's highly unlikely that RGGI participation by Pennsylvania will result in pollutant reductions that provide meaningful impacts on climate; air quality; health benefits; or, produce the amount of RGGI tax revenues that have been claimed.

Consequently, Pennsylvania's participation in RGGI is simply a symbolic gesture, albeit one with dire consequences.

History shows us that RGGI participation typically results in less in-state electric generation and the increased use of electricity from non-RGGI areas. **That's how the historic RGGI states avoid the negative effects of RGGI participation.**

In the case of Pennsylvania, non-RGGI electric generation would likely come from Ohio and West Virginia.

To understand RGGI's impacts it's necessary to engage PJM and the PJM Independent Market Monitor. Their analysis should include:

- Detailed, state specific operations impacts for **all of the electric generating units in all of the PJM states**, assuming New Jersey and Virginia join RGGI, **and** with and without Pennsylvania's participation in RGGI. This must include the generation already coming on line through 2022 and 2023, and expected to be on line prior to 2030;
- A list of electric generating units that are likely unable to compete in the PJM market due to their unit specific RGGI allowance price adder;
- Projected electricity pricing for each year;
- And, a projection of state-by-state carbon dioxide emissions for each scenario.

Absent this analysis it's impossible to accurately determine the overall impacts of Pennsylvania's RGGI participation.

The presentation made by PJM to the Air Quality Technical Advisory Committee on October 15, 2020 was described by PJM as having been cobbled together. That effort did not provide the information necessary to assess the impacts of RGGI participation. That presentation was simply to check a box that the Department had engaged PJM in some fashion.

What have I learned from my extensive review of the ICF modeling and the electricity generation and sales in the historic RGGI states and Pennsylvania?

- I know that RGGI participation will accelerate the retirement of Pennsylvania's coal-fired units which will likely be retired before 2030 without RGGI;
- I know it will affect the economic viability of Pennsylvania's natural gas-fired units;
- I know it will reduce the amount of electricity generated in and exported from Pennsylvania;
- I know lost Pennsylvania generation will be replaced by either coal-fired or natural gas-fired electric generation in other PJM states;
- I know RGGI doesn't cause a shift to renewable electric generation. The historic RGGI states continue to legislate to incentivize or mandate investments in renewables;

- I know RGGI doesn't help nuclear generation. If it did, New York, Connecticut, and ISO-New England wouldn't have had to provide economic support to their nuclear plants;
- I know RGGI will result in companies moving the development of new natural gas-fired generating units to non-RGGI PJM states;
- And, I know that any RGGI tax will be borne disproportionately by residential customers.

But...

- Nobody knows how much, if any, regional emissions reductions will occur;
- Consequently, nobody knows what health benefits will occur;
- Further, nobody knows how much Pennsylvania RGGI tax revenue will be collected.

I do want to support the Department's and Administration's recognition of the great value provided by the coal refuse to energy plants.

I have witnessed the great transformations that have occurred because of these facilities.

I've experienced stream recoveries where there is now flourishing aquatic life.

I've experienced reclaimed mining affected lands.

I've experienced the elimination of toxic air pollution from coal refuse piles that engulfed communities.

And these don't include the additional safety and health benefits resulting from the removal of coal refuse.

Without the coal refuse to energy plants, these activities will no longer occur in the area where I live.

As a resident of coal country, **that is an outcome I am not willing to accept!**

Come to coal country and conduct a meeting to talk to the people whose lives have been made better because of these facilities rather than those that have never seen a coal refuse pile, let alone lived in the vicinity of coal refuse piles and stained and dead acid mine drainage affected streams.

Perspective is a wonderful thing but if you haven't personally experienced these sad circumstances, you don't have perspective, all you have is an opinion.

Thank you for the opportunity to testify this afternoon.