



Stephen Hoffman

From: ecomment@pa.gov
Sent: Friday, January 8, 2021 12:35 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:

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Comments entered:

Copy of the remarks made in the public hearing regarding RGGI on December 10 in the evening. My name is Sylvia Neely and I am very fortunate to live in State College, Pennsylvania where I am able to enjoy the great resources of the main campus of Penn State. This fall I followed closely the presentations given by the Center for Energy Law and Policy that gave the conclusions of research they had carried out on the impact that joining RGGI would have for Pennsylvania. The lectures were excellent, bringing together knowledgeable experts from several different fields. My written remarks include links to the presentations (see end of these remarks). If you have not already done so, I urge you to get in touch with Prof. Seth Blumsack, the head of the Center for Energy Law and Policy and an expert on energy economics. His email is also in my written testimony.

The first presentation by Prof. Joel Landry focused on the economic consequences and concluded that net economic benefits are greater than the costs of the program. The second presentation focused on the health co-benefits. Professor Wei Peng concluded that the benefits from saving on health costs are actually greater than what the DEP had estimated because the researchers were able to use county data and more specific statistics. Indeed, the health co-benefits are greater than the net economic benefits for Pennsylvania. The third presentation by Prof. Daniel Walters of the Penn State Law School explored the various legal issues regarding RGGI. I found especially valuable and heartening his discussion of the ways the auction revenue could be reinvested. The final lecture by Prof. Daniel J. Mallinson of Penn State Harrisburg explored the

ways RGGI would work along with Act 129 and Act 213. The possibilities for using the revenues are extensive, including areas such as forests, grants to municipalities for carbon dioxide emissions, and to the dairy industry for methane reduction.

Economists of every political persuasion urge a price on carbon as the first step in solving the climate crisis. Once the cost of the externalities of fossil fuel use are factored in, the market will be able to find the most efficient ways of making the transition to renewable energy. RGGI is a method of pricing carbon and one that is compatible with a strong and growing economy for the Commonwealth of Pennsylvania.

Now is the time to begin to make this transition. If we do not do so, the American economy will be left behind as the rest of the world develops the technology of the future. Already other countries are pricing carbon and the European Union is threatening a border cost for imports from countries that have not done so. For our own economic wellbeing it is essential that we prepare our economy to take its place in the economy of the future which will rely on new technologies and renewable energy. There is no reason to hesitate since research shows that joining RGGI will be good for the economy.

RGGI is a system that is compatible with actions being taken at the local level to address climate change because it will make projects that municipalities want to undertake more affordable. In my area, the Center Region municipalities as well as the borough of Bellefonte have initiated important climate action plans. They will be more likely to succeed with supportive state action and with the possibility of grants from the revenues that RGGI will generate.

RGGI is also compatible with efforts to institute a federal carbon tax and dividend plan. I volunteer with Citizens' Climate Lobby. Our efforts to pass federal legislation to price carbon and distribute all the proceeds to households in the form of a dividend are completely compatible with RGGI.

Pennsylvania needs to look to the future. We need to build our economy on a solid foundation. We need to listen to experts who can help us do so in a responsible way. I urge you to listen, not to me who am no expert in this field, but to the researchers who have the data to back up this conclusion. We need to join RGGI.

Here is information on the fall webinar series on the Regional Greenhouse Gas Initiative sponsored by the Center for Energy Law and Policy at Penn State University.

The four webinars have been archived for public viewing. To watch them, please click on the links below.

- October 2, 2020: Prof. Joel Landry, "What does RGGI mean for energy costs and the power grid in Pennsylvania"

[https://psu.zoom.us/rec/play/t0XBDWahdRa0yW2O16_giA8pGlxBTb1FDchMWY0V51IXkIugE2PPdH94PcWK1I4M-](https://psu.zoom.us/rec/play/t0XBDWahdRa0yW2O16_giA8pGlxBTb1FDchMWY0V51IXkIugE2PPdH94PcWK1I4M-kADsRe92wkWzb6Y.YUfrxBw4sxTBowiQ?startTime=1601654391000&_x_zm_rtaid=_filqvMIRa2T9glv_B7S2g.1610126757889.0e9adbd7cd96c8543b593f01af9dc981&_x_zm_rhtaid=360)

[kADsRe92wkWzb6Y.YUfrxBw4sxTBowiQ?startTime=1601654391000&_x_zm_rtaid=_filqvMIRa2T9glv_B7S2g.1610126757889.0e9adbd7cd96c8543b593f01af9dc981&_x_zm_rhtaid=360](https://psu.zoom.us/rec/play/t0XBDWahdRa0yW2O16_giA8pGlxBTb1FDchMWY0V51IXkIugE2PPdH94PcWK1I4M-kADsRe92wkWzb6Y.YUfrxBw4sxTBowiQ?startTime=1601654391000&_x_zm_rtaid=_filqvMIRa2T9glv_B7S2g.1610126757889.0e9adbd7cd96c8543b593f01af9dc981&_x_zm_rhtaid=360)

- October 16, 2020: Prof. Wei Peng, "Understanding the link between RGGI, air quality and health outcomes"

https://psu.zoom.us/rec/play/SCFMOXpZP0_5cdh0QvrH8mOp-stmC5cSr50bbmaBaZI7Klbdq3bY7M1ynkzuchabL90W6jwKNRXXV1si3.1m_4Zak24mium1gD?startTime=1602864001000&_x_zm_rtaid=_filqvMIRa2T9glv_B7S2g.1610126757889.0e9adbd7cd96c8543b593f01af9dc981&_x_zm_rhtaid=360

- November 6, 2020: Prof. Daniel Walters: "The legal environment for RGGI in Pennsylvania"

https://psu.zoom.us/rec/play/NKIvrnC9igfQpICFRXTHGECbrWHUTBCZPQhUEIHceqSbuuxf95VXWNS0C2RkxI8OpzIfhGUizLP0j223.BM7U8W9LV5wktBOi?startTime=1604682123000&_x_zm_rtaid=_filqvMIRa2T9glv_B7S2g.1610126757889.0e9adbd7cd96c8543b593f01af9dc981&_x_zm_rhtaid=360

- December 4, 2020: Prof. Daniel Mallinson and Andrew Bell: "How RGGI fits into Pennsylvania's

evolving energy policy landscape”

https://psu.zoom.us/rec/play/r5K8-b3aY7yU3x2xoNNcz4aChg0pKyQnBTCFPurtTZ1wh9-4_WDdQY0CWK3q3DzswasfsiQVwdHtEuTh.KmrTs1jYI94ubvof?autoplay=true&startTime=1607101236000

The Center for Energy Law and Policy also supported the completion of an interdisciplinary report, “Prospects for Pennsylvania in the Regional Greenhouse Gas Initiative,” which is available for public download. https://sites.psu.edu/celp/files/2021/01/CELP_RGGI.pdf

The three-page executive summary of the report is also available as a separate document for public download.

<https://sites.psu.edu/celp/files/2021/01/CELP-RGGI-ExecSum.pdf>

Additionally, the report’s technical appendix, which details the modeling assumptions used in the team’s analysis, is also available.

https://sites.psu.edu/celp/files/2021/01/CELP_RGGI_Appendix1.pdf

Questions about the report or webinars can be addressed to Seth Blumsack, Director of the Center for Energy Law and Policy, at sab51@psu.edu.

No attachments were included as part of this comment.

Please contact me if you have any questions.

Sincerely,
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