



Stephen Hoffman

From: ecomment@pa.gov
Sent: Monday, January 11, 2021 8:09 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-jflanagan@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:

Melissa McSwigan
 (mmcswigan@preservationpgh.org)
 4131 Bigelow Blvd
 Pittsburgh, PA 15213 US

Comments entered:

Dear DEP Regulatory Comments,

I write to ask the Department of Environmental Protection to finalize this proposed rulemaking to allow Pennsylvania to participate in the Regional Greenhouse Gas Initiative (RGGI) beginning in January 2022. Pennsylvania electric power sector is responsible for roughly one-third of Pennsylvania's greenhouse gas pollution.

The proceeds from RGGI must be invested in energy efficiency and renewable energy programs, thereby positioning Pennsylvania to become a leader in the growing clean energy economy. Indeed, Pennsylvania will generate hundreds of millions of dollars in proceeds annually from this program. These funds must be invested in targeted efforts to eliminate air pollution, spur job creation, support working Pennsylvanians, and help boost the state's long-term economic recovery from the COVID-19 pandemic. A portion of the proceeds should be used to help workers and communities who will be affected by the ongoing and inevitable transition of the energy market away from coal and natural gas to cleaner sources of generation.

I urge DEP to provide a mechanism to adjust the starting allowance budget if actual emissions are lower than currently projected. It can be challenging to accurately predict future emissions, and a cap that is set too high will affect the integrity of the program.

I acknowledge the problems posed by abandoned coal refuse piles but do not support the waste coal set-aside. At minimum, I recommend amending the definition of legacy emissions, which determines the number of free allowances provided in the set-aside. This account should be no larger than is necessary to cover actual emissions. Since 2018, four waste coal plants have retired. These plants should be removed from the calculation of legacy emissions as they will not exist in 2022.

I strongly support the strategic use set-aside account included in the proposed rule and urge that this set-aside account survive independently of the waste coal set-aside. As currently drafted, if waste coal-fired generation disappears in Pennsylvania, the waste coal set-aside account disappears and so, too, does the strategic use set-aside.

This action will adhere with Governor Wolf's greenhouse gas reduction goals set forth in Executive Order 2019-01. Thank you.

Sincerely,

No attachments were included as part of this comment.

Please contact me if you have any questions.

Sincerely,
Jessica Shirley

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