



CENTER TOWNSHIP BOARD OF SUPERVISORS

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 Matthew G. Housholder, Vice-Chairman
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Secretary: Sarah J. Smith

January 7, 2021

Environmental Quality Board
 P.O. Box 8477
 Harrisburg, PA 17105-8477

Re: Public Comment Period for RGGI

Dear Environmental Quality Board:

On behalf of the Center Township Board of Supervisors, Indiana County, I write to you to express the Board's opposition to Pennsylvania joining the Regional Greenhouse Gas Initiative ("RGGI"). If Pennsylvania joins RGGI, it will cause a significant negative financial impact on the Homer City Generating Station, which is located within Center Township. We are convinced that any significant negative financial impact on the Homer City Generating Station will result in the devastation of our local economy. The following are specific reasons why we believe Pennsylvania should avoid joining RGGI.

ECONOMIC HARM TO CENTER TOWNSHIP

The Pennsylvania Department of Environmental Protection ("DEP") modeling confirms that RGGI will trigger the near immediate and premature closure of all coal and many older natural gas plants in Pennsylvania. This will result in thousands of direct jobs to be lost, including blue collar union plant workers and contractors. Also, plant host communities, such as Center Township, will be devastated by plant and supplier losses because communities such as ours depend heavily on the local plant to hold our economy together by providing a property tax base. The closure of the Homer City Generating Station will undoubtedly wipe out a significant portion of our property tax base and drive more of our residents into poverty.

LOW-INCOME HOUSEHOLDS WILL SUFFER THE MOST

If Pennsylvania joins RGGI, energy costs will increase because energy companies will pass the cost of lowering carbon emissions on to the consumers. The Citizen Advisory Counsel of DEP has acknowledged that electricity rates would increase. Low-income households and the working poor spend a much higher percentage of their income on heating and powering their homes, so they will be most negatively impacted by the rate increases. Furthermore, there are no assurances in the proposed regulation that low-income households will receive any of the RGGI Tax Revenues through direct rebates or other financial assistance.

STATEWIDE ECONOMIC HARM

The economy of Pennsylvania, particularly in Western Pennsylvania, has benefitted greatly over the years due to its abundance of coal and natural gas resources. These resources have provided consumers with access to relatively low-cost electricity and have allowed for a robust manufacturing sector. If Pennsylvania joins RGGI, it will render uncompetitive many of Pennsylvania's current electric plants, undermine Pennsylvania's status as an energy exporter, eliminate thousands of jobs, and lead to massive increases in property taxes and electricity rates. Energy jobs and capital investments will leave Pennsylvania and shift to neighboring states who are unwilling to join RGGI, such as Ohio and West Virginia, resulting in unnecessary economic hardship with no net environmental benefit in our region.

LACK OF ENVIRONMENTAL BENEFITS

Regional Carbon Emissions will not be reduced if Pennsylvania joins RGGI because any net reduction of carbon emissions from our state will be increased in Ohio and West Virginia. Unless all states in the region agree to join RGGI, it makes no sense for Pennsylvania to join because we will be needlessly shifting resources away from our local communities without any discernable benefit to the environment.

NOTABLE OPPOSITION TO RGGI

There is a broad coalition of opposition to RGGI from organized labor such as the Pennsylvania AFL-CIO, Ironworkers, Boilermakers, and the United Mine Workers. RGGI is also opposed by the Pennsylvania Manufacturers Association and regional chambers of commerce. RGGI has bipartisan opposition in the General Assembly and State Senate. Three independent advisory boards within DEP, the Citizens Advisory Counsel, the Air Quality and Technical Advisory Committee and the Small Business Advisory Committee, all oppose RGGI.

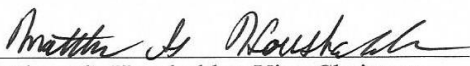
For all of the foregoing reasons, I respectfully ask on behalf of the Center Township Board of Supervisors of Indiana County that Pennsylvania not join RGGI.

Sincerely,


CENTER TOWNSHIP SUPERVISORS



David E. Smyers, Chairman



Matthew G. Housholder, Vice-Chairman



James F. Gatskie, Supervisor