



Stephen Hoffman

From: ecomment@pa.gov
Sent: Wednesday, January 13, 2021 1:46 PM
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Cc: c-jflanagan@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 9 (1pm) - #7-559
Testimony date: 12/14/2020 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:

Andrea Wittchen
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Comments entered:

I am a co-founder and owner of iSpring, a regional sustainability consulting firm in the Lehigh Valley and Philadelphia working with manufacturers, higher education institutions, and the public sector in the areas of metrics and reporting, operational sustainability and education and outreach. I'm also the president of the Lehigh Valley Sustainability Network which provides a web-based resource for regional cooperation on sustainability issues throughout the Lehigh Valley.

I am testifying today in support of Pennsylvania's participation in the Regional Greenhouse Gas Initiative to cut climate change pollution from electric power plants.

For 12 years I have worked along with my clients as they have tried hard, often in a vacuum and with little governmental support, to battle the effects of climate change by reducing their carbon footprints and minimizing their CO2 emissions. But their efforts, while so important to their

organizations, cannot possibly have the magnitude of impact that controlling CO2 emissions from the electric power sector would have.

I have watched over my six decade-plus lifetime as private enterprise continually refuses to make economic choices that incorporate the concerns and needs of their communities in their race to maximize profit. Fossil-fuel based electric power plants rank high on the list of companies who have put profit before planet and reaped enormous benefit.

The Lehigh Valley, where I live, has one of the worst air quality levels in the country. This is not a coincidence, nor is it unavoidable. Regulation of carbon emissions by power plants situated throughout the commonwealth would contribute to mitigation of particulate matter in the air and improve air quality. The point is that we – and the power plants – have known this for decades. And yet they have continued to make economic decisions that have not contributed to a solution.

The plan to participate in RGGI will put our electric power sector into a regimen that will force a regional limit on CO2 emissions by power plants. This is something they have repeatedly refused to do on their own. But it's our health and our quality of life that is at stake. One of government's primary roles has always been to protect its citizens and a commitment to participate in RGGI speaks directly to government fulfilling that role.

The economic aspects of RGGI provide an incentive for the electric power sector to reduce their emissions for their own economic benefit. A price on carbon and the ability for efficient, compliant companies to trade or bank credits creates a market that motivates companies to continuously push the envelope on implementing new, cleaner technologies. Up until now, Pennsylvania electric power companies have had a free ride on producing dirty carbon pollution.

Participation in a multi-state compact like RGGI also multiplies the effectiveness of carbon emission reduction. Carbon pollution doesn't recognize state boundaries. The more states involved in carbon emission reduction, the more comprehensive the solutions are and the faster they can be implemented. This past summer we saw how wildfires in the West affected our air quality in Pennsylvania. Carbon pollution has the same effect. By banding together, states can restrain emissions over a broad area, delivering cleaner air to millions of citizens.

Sadly, there has been a noticeable lack of leadership on this issue at the national level over the last 4 years. As I wrote just this morning in The Morning Call, the U.S. is less than halfway to the goal it committed to in the Paris Agreement of cutting emissions to 28% below 2005 levels by 2025. There's little chance of meeting it. This has left it to states, corporations, municipalities and NGOs to pick up the slack. Pennsylvania has not exactly been leading the way on this but joining RGGI can change this.

And while there is new hope with the incoming administration of returning to our national and global leadership, we cannot, as a state, continue to shirk our responsibility to meeting those goals. Joining RGGI would allow us to step up our game and do our part, in collaboration with our neighboring states, to deliver a cleaner, healthier future for all our citizens.

No attachments were included as part of this comment.

Please contact me if you have any questions.

Sincerely,
Jessica Shirley

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