



**Mark Borowski**  
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Secretary Patrick McDonnell  
Chair, Environmental Quality Board  
P.O. Box 8477  
Harrisburg, PA 17105-8477

Re: Regional Greenhouse Gas Initiative Comments from bp

Dear Chairman McDonnell:

Thank you for providing the opportunity to comment on Pennsylvania's proposed rulemaking to establish a CO2 Budget Trading Program in order to join the Regional Greenhouse Gas Initiative (RGGI). bp supports the Commonwealth's efforts to join RGGI, with its proven track record of lowering greenhouse gas emissions in the power sector. This cap-and-invest program is an efficient and cost-effective way to tackle one of the most pressing issues of our time.

bp has a broad range of business interests in Pennsylvania, and a direct interest in RGGI's impact on the state and its economy.

- **Wind energy:** Our 9,000-acre Mehoopany wind farm in Wyoming County produces 141 megawatts of electricity, enough to power about 38,000 Pennsylvania homes.
- **Solar power:** Lightsource bp, our solar energy partnership with east coast headquarters in Philadelphia, collaborated with Pennsylvania State University on a 70-megawatt solar project in Franklin County that will provide 25% of the university's state-wide electricity requirements while reducing CO2 emissions by 57,000 metric tons annually.
- **Natural gas:** We are a significant marketer of Pennsylvania natural gas and power, and our investments helped support construction of over 1,000 megawatts of new gas-fired, wind and solar generation in Pennsylvania in the last eight years.

Last year we announced our ambition to become a net zero company by 2050 or sooner, and help the world get there, too. That includes advocating for sound policy measures and for programs such as RGGI. While companies like ours can – and must – play a leading role in bringing about a lower carbon future, government leadership is essential.

bp supports well-designed carbon pricing programs, such as RGGI, which use the power of competitive markets and consumer behavior to reduce emissions and encourage innovation. RGGI also provides the certainty companies need to invest and bring new technologies to people faster and at the scale required for real progress.

And the results for RGGI speak for themselves. Since 2008, power sector emissions have plummeted at a rate almost double the rest of the US in the states belonging to RGGI. Critically, GDP in these states outpaced growth elsewhere by 31% over the same decade, proving states don't have to choose between the economy or the environment.<sup>1</sup>

While a national carbon pricing program would be ideal, sectoral, state and regional plans can play a critical role now in moving us in the right direction. We believe there is a critical role for Pennsylvania, the northeast's leading energy producer and exporter, in this regional effort. Pennsylvania natural gas helps reduce carbon emissions across the region, and the state's growing renewable sector, which will benefit from a program like RGGI, will further solidify Pennsylvania's status as an energy powerhouse. It makes sense for the Commonwealth to lead in regional energy decisions, and especially on making certain the infrastructure is developed to get Pennsylvania-produced energy – from all sources – to regional markets.

We look forward to assisting you however we can in these efforts.

Sincerely,

Mark Borowski  
Director, State & Local Affairs

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<sup>1</sup> [https://acadiacenter.org/wp-content/uploads/2019/09/Acadia-Center\\_RGGI\\_10-Years-in-Review\\_2019-09-17.pdf](https://acadiacenter.org/wp-content/uploads/2019/09/Acadia-Center_RGGI_10-Years-in-Review_2019-09-17.pdf), pg. 7