



Stephen Hoffman

From: ecomment@pa.gov
Sent: Wednesday, January 13, 2021 3:47 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:

Ray Roberts
 Citizens' Climate Lobby Pennsylvania (L.ray.roberts@gmail.com)
 1122 North Saint Clair Street
 Pittsburgh, PA 15206-1626 US

Comments entered:

Jon Clark (Regional Coordinator), Ray Roberts (Pennsylvania Co-Coordinator), Randy Gyory (Pennsylvania Co-Coordinator) and Karen Melton (Pennsylvania Liaison Coordinator) represent the Pennsylvania chapters of Citizens' Climate Lobby (CCL). Citizens' Climate Lobby consists of over 181,000 supporters nationwide and over 6,300 supporters and volunteers within PA. We speak for those thousands of Pennsylvanian CCL members. And, over the past decade, we've become citizen experts on carbon pricing policies.

Regional Greenhouse Gas Initiative (RGGI) is a form of cap-and-trade with a proven, long-term track record that is effective in cutting greenhouse gas (GHG) pollution, improving citizens' health through improved air quality, and making investments in clean energy that have, over time, lowered household utility bills. Pennsylvania's Citizens' Climate Lobby members strongly and enthusiastically support our state joining RGGI.

The Intergovernmental Panel on Climate Change (IPCC) is the world's foremost scientific authority on climate change advising policymakers. In 2018 the Fifth IPCC report was harsh and clear: We must work urgently to significantly reduce GHG pollution as much and as fast as possible between now and 2030 if our world is to remain livable with +1.5°(Celsius) of warming. Overshooting +1.5° would lead to unacceptable risks to humans and other life. The policy implications relevant for Pennsylvania show that the sooner we start, the easier the transition

will be. The longer we wait, we set ourselves up for a more harsh and difficult shock to our systems for food, water, energy and healthcare. [1]

Rising energy costs will affect low income households the most. Our position is that the bottom two economic quintiles (lower 40%) should be fully protected from initially rising energy costs from any carbon pricing initiatives. This can be achieved through a direct deposited dividend either to their bank account or SNAP benefit card. Research from the Brookings Institute on the economic benefits of providing low income households with benefits shows that each dollar invested this way will yield more than twice as much in local economic gains, afford local employers to hire more workers and provide a ladder for youth to rise out of poverty [2].

Pope Francis' encyclical Laudato Si, Our Common Home, speaks specifically to the moral obligations of cap-and-trade markets to adequately address the needs of the poorest among us. [3] Our poorest Pennsylvanians have contributed the least to our climate crisis but have been shown to be hit the hardest by the consequences. These needs should be addressed by how our state implements RGGI. A regular direct benefit to low income households will help our entire Commonwealth to be more humane, responsible to our fellow citizens and improve our state's resilience to flooding and other climate hardships.

Finally, we feel there should be a set "hard" floor on allowances; a locked in, minimum cost for allowances to guarantee and ensure real emissions reductions.

Science dictates the urgency and need of our response; a maximum of +1.5°(Celsius). The sooner Pennsylvania begins the transition, the better off our citizens will be. We maintain that the bottom 40% of income earners should be protected from initially rising energy costs, knowing that long-term all will benefit from lower energy expenses. A direct dividend rebate is the simplest and most effective means to provide this. The moral need to protect the poor is clear and will benefit all in our Commonwealth. If there is another recession, we still must continue the transition to cleaner energy which requires a locked in floor for the price of allowances. Our members are following your actions closely and call on you to follow our informed recommendations.

[1] <https://www.ipcc.ch/2018/10/08/summary-for-policymakers-of-ipcc-special-report-on-global-warming-of-1-5c-approved-by-governments/>

[2] <https://www.brookings.edu/articles/the-earned-income-tax-credit-and-community-economic-stability/>

[3] https://papers.ssrn.com/sol3/papers.cfm?abstract_id=2908996

No attachments were included as part of this comment.

Please contact me if you have any questions.

Sincerely,
Jessica Shirley

Jessica Shirley
Director, Office of Policy

PA Department of Environmental Protection
Rachel Carson State Office Building
P.O. Box 2063
Harrisburg, PA 17105-2063
Office: 717-783-8727
Fax: 717-783-8926
ecomment@pa.gov