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Environmental Quality Board
Via DEP Portal

Re: Commission on Economic Opportunity Comments
Environmental Quality Board Proposed Rulemaking-CO2 Budget Trading Program

Dear Members of the Environmental Quality Board:

I am submitting these comments on behalf of the Commission on Economic Opportunity (CEO) in regard to the Proposed Rulemaking-CO2 Budget Trading Program.

CEO is a community action agency located in and serving low-income households in Luzerne County. In a typical year, the Commission serves more than 30,000 Luzerne County residents, of which 98% are at or below 150% of the poverty level. It is part of the responsibility to our constituency to advocate for their interests in regulatory proceedings. CEO has been an active party in numerous matters before the Pennsylvania Public Utility Commission to address a utility company's low-income energy programs, both in rate cases and Act 129 proceedings.

Additionally, CEO has weatherized more than 35,000 homes under the U.S. Department of Energy Weatherization Assistance Program. The organization also serves as a subcontractor for the Low-Income Usage Reduction Programs of PPL Electric and UGI Gas and Electric Divisions. In addition to energy conservation, CEO is the contracted operator of Customer Assistance Programs sponsored by PPL and UGI and operates the hardship assistance funds for each of those utility companies. CEO is also the PA Department of Public Welfare's contracted operator of the crisis component of the Low-Income Home Energy Assistance Program (LIHEAP) in Luzerne and Wyoming Counties. CEO was also a major contractor for PPL in the Low-Income Renewable Energy Pilot, and secured funding and installed several solar thermal water heating systems for the former PG Energy and UGI Gas Division.

CEO supports the proposed CO2 Budget Trading Program; it addresses carbon emissions and provides funds to address the disparate impact of pollution reduction efforts on low-income communities.

It is because of the disparate impact on low-income communities that CEO recommends that the impacts of the Program on vulnerable communities be studied and addressed.

The impacts of the Program on low-income people should be studied and addressed on an ongoing, regular basis. Low-income people are most likely to live near polluting industries and the increased cost of energy would have a negative impact on that community. The COVID-19 pandemic has had a tremendous negative impact on low-income communities not only in terms of health but also economically. They lack the resources and support to deal with a loss of income, to home school, to pay for childcare etc. An increase in their energy costs would exacerbate their already difficult financial situation.

CEO also recommends that the regulation include principles for reinvestment that prioritize low-income communities with programs that are administered by local community-based organizations. These community-based organizations understand the needs of their clients across a broad spectrum of needs, including energy reduction and bill assistance. Auctions proceeds should include investment in weatherization; weatherization promotes conservation and allows low-income ratepayers to reduce their energy costs.

CEO believes that the low-income community should not bear any cost of RGGI. The Program should study and mitigate any direct or indirect costs imposed on the low-income community through the Program and provide assistance that promotes conservation and reduces energy costs for low-income households.

Thanks for the opportunity to comment on this important matter.

Sincerely,

s/ Joseph L. Vullo
Joseph L. Vullo