Libertarian Party of Bradford County, PA Independent Regulatory Review Commission

Patrick McDonnell, Secretary Pennsylvania Department of Environmental Protection

RE: PROPOSED RULEMAKING: CO2 BUDGET TRADING PROGRAM (#7-559)

Dear Secretary McDonnell,

I, and surely all Libertarians in Pennsylvania, am categorically opposed to the proposed rulemaking that seeks to bind Pennsylvania to the Regional Greenhouse Gas Initiative.

Pennsylvania has already seen significant reductions in CO<sub>2</sub> emissions over the last ten years, and they were driven not by regulation, but by innovation and market-based decisions. Encouraging and supporting these natural, sustainable remediations will ultimately prove to be more effective at greenhouse gas reduction than the cap and trade program that is the core of RGGI. Regulation tends to take away from efficient processes and favor inefficient ones, and we need truly efficient mechanisms if we are going to solve the problem of human-induced climate change due to carbon emissions.

Many organizations and individuals have or will present data and studies by scientific experts demonstrating that RGGI has been cost effective at reducing emissions and with little harm to citizens; and many other organizations and individuals will present data and studies by scientific experts proving the exact opposite – that RGGI has been costly and has driven jobs and power generation to other states, has resulted in increased electric bills and other costs to lower income people that are not offset by programs, and also ineffective, with no demonstrable health benefit to the health and welfare of its citizens. I do not presume to think that I can add anything compelling to the conflicting science, and I doubt I can offer a persuasive political argument to dissuade you from this course of action.

Bowing to the inevitable, I would instead like to thank you for taking the opportunity to lay all these conflicting opinions to rest by risking the welfare of the citizens of Pennsylvania and on this speculative action. It seems rather daring in light of the substantial economic impact that we are already experiencing from Covid-19. You're also giving yourself quite a challenge in showing efficacy when we're already on track to see the largest single year reduction in greenhouse gas emissions in 2020, which is supposed to be the underlying rationale for the new regulation. But more than any other state that's already in RGGI, Pennsylvania is uniquely positioned to demonstrate the benefits to the economies of neighboring Ohio and West Virginia of not joining a regional consortium. All this data will help clarify the utility and cost-effectiveness, or not, of a cap and trade program.

Thank you for the opportunity to provide input on the proposed regulations.

Regards,

Greg R. Perry Chair, LPBCP

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