



January 13, 2021

Environmental Quality Board
P.O. Box 8477
Harrisburg, PA 17105-8477

Re: Proposed CO2 Budget Trading Program (#7-559)

To Whom it May Concern:

The Solar Energy Industries Association (SEIA) is pleased to submit the following comments on the Department of Environmental Protection's Proposed CO2 Trading Program. SEIA is the national trade association for the United States solar industry. With more than 1,000 member companies nationwide, SEIA is leading the transformation to a clean energy economy, creating the framework for solar to achieve 20% of U.S. electricity generation by 2030. SEIA works with its 1,000 member companies and other strategic partners to fight for policies that create jobs in every community and shape fair market rules that promote competition and the growth of reliable, low-cost solar power.

SEIA has approximately 28 member companies located in Pennsylvania. In addition, SEIA member companies based all over the country are doing business in Pennsylvania and have a direct interest in the future of clean energy across the Commonwealth. Pennsylvania is home to a burgeoning solar market with over \$2.07 billion dollars in statewide investment and 395 solar companies employing roughly 4,331 workers including manufacturers, distributors, professional service providers, and contractors/installers.

SEIA offers its support of the Pennsylvania Department of Environmental Protection's proposed rule that would allow Pennsylvania to join the Regional Greenhouse Gas Initiative, or RGGI. SEIA's members have a strong interest in the adoption and implementation of policies and programs that will accelerate the movement toward a low-carbon economy and stimulate the development and use of clean and zero-carbon, renewable energy technologies such as solar photovoltaic generation. RGGI is an important tool to help us achieve this vision.

In addition to supporting participation in RGGI, SEIA encourages Pennsylvania to prioritize the investment of RGGI proceeds into clean energy. Proceeds from RGGI have powered significant investments in clean energy technology and energy efficiency in all other RGGI participating states. SEIA and its members look forward to working with the Department to ensure that Pennsylvania also benefits from this opportunity. The investment of allowance auction proceeds can be used to promote affordable, reliable, clean energy across Pennsylvania's diverse regions and communities. While auction proceeds alone are not sufficient

to entice a robust clean energy economy, they can complement other policy mechanisms that facilitate greater deployment of clean energy technologies, such as solar energy.

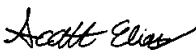
Pennsylvania is at an important juncture; how the Commonwealth chooses to reinvest potential allowance auction proceeds will be an important market signal and could help drive greater investments in clean technology. Therefore, SEIA encourages Pennsylvania to prioritize the following objectives for the investment of RGGI Proceeds:

- 1) Drive investment in renewable energy generation through programs that support low-income access to solar energy, which could include onsite and offsite solar for schools and municipalities in urban and rural areas, community solar, microgrids that are powered by renewable energy and energy storage, and innovative grid-storage solutions;
- 2) Offer grants and various types of financing including low-and no-interest loans to support the implementation of renewable energy for all Pennsylvania consumers and businesses;
- 3) Explore the establishment of or determine an appropriate existing administrative office for a new clean energy economic development office or “green bank” to attract new clean energy manufacturing and provide workforce training programs across the state, especially in those areas most impacted by the changing economics of energy.

We look forward to working with the department to prioritize the long-term scalability of solar energy across the Commonwealth. We welcome the opportunity to meet with you and provide additional information on the benefits that RGGI could provide to Pennsylvania’s solar industry.

Thank you for the opportunity to comment.

Sincerely,



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