



**Stephen Hoffman**

**From:** ecomment@pa.gov  
**Sent:** Thursday, January 14, 2021 11:58 AM  
**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:

Andrew McAllister  
 Western PA Coalition for Abandoned Mine Reclamation (andy@wpcamr.org)  
 PO Box 295  
 Luxor, PA 15662 US

Comments entered:

Dear EQB,  
 Thank you for the opportunity to provide comments and feedback on the CO2 Budget Trading Program. The Western Pennsylvania Coalition for Abandoned Mine Reclamation has long supported the waste coal to energy industry and supports the additional flexibility in the form of a limited exemption for cogeneration units that are interconnected and supply power to a manufacturing facility.  
 However, the definition of legacy emissions should be revised to ensure there are sufficient allowances in the set aside to account for the projected increase in operations by this industry. The Department must also account for the continued operation of all ten existing in-state facilities, including the Colver facility. These changes are necessary to achieve the Department's stated goal of minimizing the impact of the proposed rule on this industry while preventing the transfer of cost for RGGI compliance by for these facilities to ratepayers through significantly higher Tier II AEC prices.

Sincerely,

Andrew P. McAllister  
 Western PA Coalition for Abandoned Mine Reclamation

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No attachments were included as part of this comment.

Please contact me if you have any questions.

Sincerely,  
Jessica Shirley

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