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January 14, 2021

The Honorable Patrick McDonnell
Secretary
Pennsylvania Department of Environmental Protection
Rachel Carson State Office Building
400 Market Street
Harrisburg, PA 17101

RE: NAESCO's Support for Proposed Rulemaking on CO₂ Budget Trading Program (50 Pa.B. 6212)

Dear Secretary McDonnell:

On behalf of the National Association of Energy Service Companies (NAESCO), I am writing in support of the proposed rulemaking to bring Pennsylvania into the Regional Greenhouse Gas Initiative (RGGI).

NAESCO is the leading advocacy and accreditation organization for Energy Service Companies (ESCOs) and is dedicated to modernizing America's building infrastructure through performance contracting. Uniting the energy service industry, NAESCO promotes favorable government policies; sponsors a rigorous accreditation program; provides training and education; and champions ESCOs interests across the Nation. NAESCO counts among its members some of the world's leading energy services companies, including: ABM Energy, AECOM Energy, Ameresco, Brewer-Garrett, CEG Solutions, Centrica Business Solutions, ClearEnergy Contracting, Climatec, CM3, CMTA, ConEdison Solutions, Constellation New Energy, CTI Energy Services, E3, Energy Solutions Professionals, Energy Systems Group, EnergyLink, Engie, Entegry, FPL Energy Services, Georgia Power, GRP Wegman, Hannon Armstrong, Honeywell, Johnson Controls, McClure Energy, McKinstry, METCO Engineering, Navitas, New York Power Authority, Noresco, Perfection Group, Performance Services, Schneider Electric, Siemens Industry, Site Logiq, Southland Industries, Stark Esco, TEN, Trane, Wendel Energy Services, and Willdan.

Many of our companies have experience with RGGI through their operations in other states and we believe that linking Pennsylvania to RGGI will deliver significant benefits to the state by driving investment and jobs in renewable energy and energy efficiency. Current RGGI states have [raised nearly \\$3.8 billion](#) for investment in clean energy and other state priorities. This has helped these states cut pollution and create jobs.

As Pennsylvania recovers from the economic impacts of the COVID-19 pandemic, it will be important to focus on job creation and take measures that will support the state's long-term economic recovery. RGGI's market-based cap and investment program can do just that as proceeds from the program can be reinvested in the hardest hit communities—helping to create local jobs while also helping disadvantaged communities save money on their energy bills. This will help the ongoing transition towards cleaner energy and demand-side management technologies.

During these especially challenging economic times, the opportunities presented by joining RGGI can help the state build its post-pandemic economy while protecting our environment. I strongly recommend the Department move forward with its RGGI proposed rule.

Sincerely,

A handwritten signature in black ink, appearing to read 'Donald Gilligan', with a long horizontal flourish extending to the right.

Donald Gilligan
President
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978-498-4456