

# Indiana County Development Corporation



EXECUTIVE COMMITTEE

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EXECUTIVE DIRECTOR

**Byron G. Staunton**

DEPUTY DIRECTOR

**Angela M. Campisano**

## Via Email

January 14, 2021

Re: Opposition to Proposed Rulemaking CO2 Budget Trading Program

To Whom It May Concern:

On behalf of the Indiana County Development Corporation Board of Directors, I write in opposition to the proposed CO2 Budget Trading Program regulation as published in the Pennsylvania Bulletin on November 7, 2020 (50. Pa.B. 6212), which will join Pennsylvania to the Regional Greenhouse Gas Initiative (RGGI). We respectfully and strongly urge the Independent Regulatory Reform Commission (IRRC) to reject Governor Wolf's proposed RGGI tax on carbon.

The Indiana County Development Corporation (ICDC) is a private non-profit corporation that has served the community since 1961. The ICDC is dedicated to stimulating economic growth and promoting the industrial and economic development opportunities of Indiana County in order to make it a better place to live. The ICDC is involved in a number of real estate activities including the acquisition and development of land for business parks and the development of multi-tenant buildings. In any of these activities, the intended benefit for the community at-large is that the businesses that locate at the business parks or lease space in one of the multi-tenant buildings, commit their resources to creating and/or retaining quality jobs for Indiana County residents.

It is our collective view that joining RGGI will result in the premature closure of Pennsylvania's coal and older natural gas power plants, rendering nearly two-thirds of our electric generation uncompetitive, with no benefit to Pennsylvania. The closure of these power plants, including several in Indiana County, will result in the loss of thousands of direct jobs, negative impacts to secondary and tertiary industries that support the plants, the erosion of income and property tax revenues directly impacting our school districts and municipalities, and increased power prices that will burden consumers and businesses, thus further jeopardizing Pennsylvania's competitiveness to attract new investment.

Modeling shows that carbon dioxide reductions from plant closures or reduced generation in Pennsylvania will simply shift to neighboring, non-RGGI states, like Ohio and West Virginia. Those states will also take the related jobs, capital expenditures and, yes, carbon dioxide. As a result, carbon dioxide emissions will increase in those states, which will more than offset any emission reductions in Pennsylvania.

At a time when our state is in an economic crisis, due to the COVID-19 pandemic, with record unemployment, no one should choose to harm wages and job security, threaten the survival of businesses and manufacturers, and further jeopardize regional economies that are already struggling to survive.

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Approving the CO2 Budget Trading Program and joining Pennsylvania to RGGI will not achieve the desired result to reduce carbon dioxide emissions; it merely exports the production of affordable, reliable and resilient electricity to Ohio and West Virginia, where fossil fueled power plants aren't taxed, and exports Pennsylvania jobs and our economy too.

The proposed regulation represents a statutorily unauthorized attempt to institute a tax on carbon dioxide emissions from fossil-fuel fired power plants, and does not reflect the intent of the General Assembly. Additionally, the proposed regulation will impose extraordinary hardships on impacted employees, local communities with affected power generation plans, and consumers seeking a reliable and affordable supply of electricity.

Thank you for considering our comments. Please reject the RGGI tax regulation and protect the family sustaining jobs of thousands of Pennsylvanians within the electric generation sector and those struggling to make ends meet during this terribly difficult pandemic recession.

Sincerely,

A handwritten signature in blue ink, appearing to read "Byron".

Byron G. Stauffer, Jr.  
Executive Director