



Stephen Hoffman

From: EP, RegComments <ra-epregcomments@pa.gov>
Sent: Friday, February 26, 2021 4:25 PM
To: IRRC; environmentalcommittee@pahouse.net; Environment-Committee@pasenate.com; Iversen, Sarah A.; Emily.Eyester@pasenate.com; Troutman, Nick; Glendon King
Cc: EP, RegComments; Scott Schalles; Fiona Cormack; Reiley, Robert A.; Shirley, Jessica
Subject: Late Comment - Proposed Rulemaking: CO2 Budget Trading Program (#7-559)

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Good afternoon,

Below is a public comment regarding Proposed Rulemaking: CO2 Budget Trading Program (#7-559) that DEP received after the close of the public comment period at 11:59 PM on January 14, 2021. It was received after the public comment period closed, these comments will not appear in eComment.

Thank you,
 Laura

Laura Griffin | Regulatory Coordinator
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In order to prevent the further spread of COVID-19, all DEP offices will remain closed until restrictions are lifted. In the meantime, I will be working remotely to continue the mission of the Pennsylvania Department of Environmental Protection and frequently retrieving emails. Thank you for your patience.

From: Susan Babbitt <philad49@att.net>
Sent: Friday, February 26, 2021 3:43 PM
To: EP, RegComments <ra-epregcomments@pa.gov>
Subject: [External] Proposed Rulemaking: CO2 Budget Trading Program (#7-559)

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Dear DEP Regulatory Comments,

Let's not miss a win-win chance to reduce our emissions, protect our health, and obtain revenue that can be used for further response to climate change and help for workers and the economy. Please quickly finalize this proposed

rulemaking to allow Pennsylvania to participate in the Regional Greenhouse Gas Initiative (RGGI) beginning in January 2022. Pennsylvania has the fifth-dirtiest electric power sector in the country, and this sector is responsible for roughly one-third of Pennsylvania's greenhouse gas pollution. As a globally significant polluter, Pennsylvania has a heightened responsibility to reduce its emissions and combat climate change. Linking with RGGI would be a monumental step in the right direction.

This CO2 Budget Trading Program will significantly reduce harmful carbon pollution and protect public health. The proceeds from RGGI must be invested in energy efficiency and renewable energy programs, thereby positioning Pennsylvania to become a leader in the growing clean energy economy. Indeed, Pennsylvania will generate hundreds of millions of dollars in proceeds annually from this program. These funds must be invested in targeted efforts to eliminate air pollution, spur job creation, support working Pennsylvanians, and boost long-term economic recovery from the COVID-19 pandemic. Funds can and should be used to help workers and communities affected by the inevitable transition of the energy market away from coal and natural gas to cleaner sources of generation. I urge DEP to provide a mechanism to adjust the starting allowance budget if actual emissions are lower than currently projected. It can be challenging to accurately predict future emissions, and a cap that is set too high will affect the integrity of the program.

Abandoned coal refuse piles are a problem, but not one to be solved with a waste coal set-aside. I support amending the definition of legacy emissions. This account should be no larger than is necessary to cover actual emissions. The four waste coal plants that have retired since 2018 should be removed from the calculation of legacy emissions.

I strongly support the strategic use set-aside account included in the proposed rule and urge that this set-aside account survive independently of the waste coal set-aside.

Let's go--invest in sustainable jobs in our transitioning energy sector, and reduce our carbon pollution. In light of Governor Tom Wolf's greenhouse gas reduction goals set forth in Executive Order 2019-01, participating in RGGI is an essential policy step for Pennsylvania. Thank you for your consideration/

Sincerely,
Susan Babbitt
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