RECEIVED Nov 12 2020 Independent Regulatory Review Commission

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Cc:	c-jflanaga@pa.gov	
Subject:	Comment received - Proposed Rulemaking: CO2 Budget Trading Program (#7-559)	

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Re: eComment System

Stephen Hoffman

The Department of Environmental Protection has received the following comments on Proposed Rulemaking: CO2 Budget Trading Program (#7-559).

Commenter Information:

Thaddeus K. Stevens (thad@sylvanglen.com) PO Box 61 Gaines, PA 16921 US

Comments entered:

After reading the proposal for Pa to join RGGI as a state participant and as a member of the Citizens Advisory Council (CAC) to DEP, I studied the modelling and have read numerous treatises that relate to the issue.

It appears that all other states currently in RGGI are net energy importing states while PA is a net energy exporter.

The modelling did not make any analysis of the land use implications of mineral extraction for providing materials for construction of alternative power sources. No land use study was considered for land occupation and power line construction of alternative generation facilities.

There was no study apparent addressing the dependence on foreign sources of materials, nor how those materials were extracted from the earth (child labor, sub poverty wages, etc.) in many source countries.

There was no analysis of security risk incurred by dependence on foreign (sometimes without alliance) sources for materials unavailable in the US.

There have been allegations of conflict on the part of the consultants in developing modelling.

There has not been any economic modelling to analyze the economic impact of the inevitable increase in energy cost to Pennsylvanians.

I have just completed reading False Alarm by Joel Lomborg (sp?). The impact of assumed reduction in temperatures through a single country's reduction of CO2 emissions is so infinitesimal that it won't show up statistically; a single state's activity will not be measurable.

PA has already significantly reduced emission of Green House Gasses through market forces by changing much of its electricity generating fuel use from coal to natural gas.

Every appearance suggests this is a further expansion of government influence in the marketplace without broad consideration of its impacts. At the CAC meetings that referred to this subject, I brought up many of these issues during deliberations and, in fact, after deliberations a motion for support of the Initiative was strongly voted down; my vote was NAY!

I continue to oppose the matter and look forward to rejection by any authority considering its furtherance without comprehensive study as suggested at multiple levels of consideration.

Thad Thaddeus K. Stevens P. O. Box 61 Gaines, PA 16921

No attachments were included as part of this comment.

Please contact me if you have any questions.

Sincerely, Jessica Shirley

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