

SUBJECT: Opposed to Proposed RulemakingCO2 Budget Trading Program

To Whom It May Concern:

I write in opposition to Governor Tom Wolf's proposed regulation, CO2 Budget Trading Program 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). I urge the Independent Regulatory Reform Commission (IRRC) to reject Governor Wolf's proposed RGGI tax.

I work for Colona Transfer in Monaca, PA. We are a river/rail facility on the Ohio River. The trans load of dry bulk material such as limestone, coal and salt is vital to this area and to the various ancillary business this supports. Heavy equipment companies, truckers, conveyor/belt sales, bio and diesel fuel companies, rail and barge companies, welders, mechanics, etc. are just some of the businesses that benefit from the trans load of these items. I understand that we cannot ignore the future and ignore progress but I believe the sustainability of vital jobs for PA is the most important thing the state level governments can do for their people. When you look at the percentages on where other forms of energy rank in the country, I cannot see a near future in which our industries can be supported by wind and solar energy. Coal fired power plants need to be kept online to provide quick and sustained energy in times of crisis and to allow large industry to thrive. When solar and wind are less than 20% of the energy in the US, how could they sustain a large industrial plant that could provide thousands of jobs. We all need to think with our brains in this crucial junction. Solar and wind need to develop but abandoning coal, gas and nuclear when it is still greatly needed does not make logical sense. The advances in the scrubber systems that clean the emissions before they are released to the air do not emit the dangerous toxins that we saw 30-40 years ago. I do not deny global warming but I also realize that the major damage was probably done years ago. The loss of jobs and dependency on foreign energy to stop very small levels of emission does not follow logic.

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 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. To add insult to injury, the Wolf Administration is manipulating the regulatory process to eliminate any meaningful opportunity for people in impacted communities to have a voice, as required by law.

Approving the CO2 Budget Trading Program and joining Pennsylvania to RGGI does nothing 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.

Thank you for considering my comments. Please reject the RGGI tax regulation and protect the jobs of thousands of Pennsylvanians struggling to make ends meet during this terribly difficult pandemic recession.

Regards,

George Petrus

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