



## Stephen Hoffman

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**From:** ecomment@pa.gov  
**Sent:** Wednesday, November 18, 2020 3:01 PM  
**To:** Environment-Committee@pasenate.com; IRRC; environmentalcommittee@pahouse.net; regcomments@pa.gov; ntroutman@pasen.gov; timothy.collins@pasenate.com; gking@pahousegop.com  
**Cc:** c-jflanagan@pa.gov  
**Subject:** Comment received - Proposed Rulemaking: CO2 Budget Trading Program (#7-559)

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### Re: eComment System

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

Commenter Information:

Kevin Joseph  
 Joseph Maintenance Service (kevin@josephmaintenance.com)  
 10150 Route 259 Hwy.  
 Blairsville, PA 15717 US

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Comments entered:

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.

Joseph Maintenance is a small business that employs around 15 people on designing and maintaining coal mines and power generation plants. Without these businesses we would be forced to close our doors. Not only would your decision impact us it will trickle down to thousands of people that depend on these places to make a living.

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 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, and increased power prices that will burden consumers and businesses.

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, Kevin Joseph (Joseph Maintenance Services Inc.)

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These links provide access to the attachments provided as part of this comment.

Comments Attachment: [RGGI Opposition Comment Letter Joseph Maintenance.docx](#)

Please contact me if you have any questions.

Sincerely,  
Jessica Shirley

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