



**Stephen Hoffman**

**From:** ecomment@pa.gov  
**Sent:** Wednesday, November 18, 2020 11:19 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-jflanaga@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:

Jeff oskin  
 Allegheny County Resident (jso24@comcast.net)  
 221 Waterman Road  
 Jefferson Hills, PA 15025 US

Comments entered:

I am writing 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.

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.

All three advisory boards, including the Air Quality Technical Advisory Committee, the Citizens Advisory Council, and the Small Business Compliance Advisory Committee rejected "recommending" the rule to the Board. Despite failing to achieve agreement from a single

advisory committee, the Department made no changes to the rule and presented it as such to the Board, further evidence that the Department has not carefully considered the proposed rulemaking nor has there been meaningful consultation or interaction with affected parties during the development of the proposed rulemaking. Governor Wolfe is simply not within his right to impose this rule against the will of the people.

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.

Making Electricity is for some reason now a thankless Job. The Coal Power plants, oil and Gas plants that got us into the Industrial revolution and made Pennsylvania what it is today as well as providing electricity to millions get no thanks or consideration. These plants spend BILLIONS to meet Regulations and get no help or support. Even after spending Billions they are continually targeted and treated unfairly. Why are we not supporting these plants? Why is the government, politicians and citizens not supporting an essential business to keep it open? In reality, there is no magical green energy to wave a magical wand at unless mankind is ready to go back to the dark ages. POWER diversity is the common sense solution. Coal, Gas, Nuclear, Oil, Hydro, Wind, Solar all have a place in that. Grid Diversity is the key to Grid stability!! RGGI will kill Coal and put strangle holds on Pennsylvania's Power plants and move Jobs, Taxes and business to NON RGGI states.

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.

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No attachments were included as part of this comment.

Please contact me if you have any questions.

Sincerely,  
Jessica Shirley

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Jessica Shirley  
Director, Office of Policy  
PA Department of Environmental Protection  
Rachel Carson State Office Building  
P.O. Box 2063  
Harrisburg, PA 17105-2063  
Office: 717-783-8727  
Fax: 717-783-8926  
ecomment@pa.gov