



Stephen Hoffman

From: ecomment@pa.gov
Sent: Thursday, December 3, 2020 9:24 AM
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:

Rosemary Turner
 Conemaugh Power Plant (rtturner@keyconops.com)
 105 Jacqueline Drive
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Comments entered:

To Whom It May Concern: Please allow me to chime in on the proposed RGGI tax. I am the Outage Planner at the Conemaugh Generating Station in New Florence, PA. I have been working in this industry for almost 43 years. Over these years, we have spent millions and millions of dollars making improvements to meet environmental regulations. Actually, we have gone well beyond that. Do you realize how many lives would be impacted by enacting this legislation? How many jobs would be lost, not just mine; what about the engineers, boilermakers, coal miners, truck drivers, scaffold builders, insulators, and on and on. What about the secondary impact to folks like small business stores, restaurants, etc. Haven't they already paid the price with COVID-19 impacts!!! Where do you think all of the electricity will be coming from once the coal-fired power plants close believe me, wind and solar is not the answer and cannot compete with our ability to produce power. I'm hoping for an extra hot summer with rolling blackouts so you can see how much you really rely on electricity in your homes and businesses. Think about it, no hot coffee, ice cubes, air conditioning, lighting at the flip of a switch. From a personal standpoint, it would be devastating for me ... OK, I've worked almost 43 years. I'm almost at my retirement age, but I'd like to follow in my parents' footsteps and always help my children financially. They live from paycheck to paycheck. I don't think they could make it without my help. They are hard-working but it's hard for young people these days to get ahead. I don't have any grandchildren yet, but when God blesses me with some, I wouldn't hesitate allowing them to grow up with a coal-fired power plant in their backyard. I've been around them all my life and I

ain't dead yet. Please consider my request. 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. It is my understanding that IRRC reviews a proposed regulation based on certain criteria, including:

- Is the proposed CO2 Budget Trading Program authorized by statute and does it conform with the intention of the General Assembly?
- Will RGGI hurt the economy? Will it impact state tax revenues? Does RGGI have a negative impact on small businesses?
- Does RGGI protect the public health, safety, and welfare?
- Is RGGI feasible and reasonable for Pennsylvania?

Governor Wolf's proposed RGGI tax regulation fails on each of these criteria. Pennsylvania law neither authorizes nor requires the regulation of carbon dioxide, a life essential gas (like oxygen). In addition, under the Pennsylvania constitution, RGGI is a \$2.4 billion "tax" on every ton of carbon dioxide emitted from a fossil fuel plant. Any new tax must be expressly authorized by the General Assembly. In fact, every current RGGI state had express authorization from its legislature to implement RGGI or, like New York, regulate carbon dioxide. RGGI will most certainly impair Pennsylvania's economy through fossil fuel plant closures and thousands of lost jobs. Pennsylvania income tax revenue will certainly decline along with local property and sales taxes collected in the affected communities. The adoption of RGGI will result in the loss of over 8,000 jobs, the loss of \$2.87 billion in total economic impact, the loss of \$539 million in employee compensation and the loss of \$34.2 million in state and local taxes. Two-thirds of our electric generation will be rendered uncompetitive, which in turn will lead to increased electric rates in-state and a migration of new generation investment across our borders to states like Ohio and West Virginia which do not participate in RGGI. And for what benefit? The Governor's own modeling confirms that most of the carbon dioxide reductions from plant closures or reduced generation will simply shift to neighboring, non-RGGI states, like Ohio and West Virginia. Those states will also take all the related jobs, capital expenditures and, yes, carbon dioxide and pollutants. As a result, carbon dioxide and real pollutants will increase across our border and in our region, which will more than offset any carbon dioxide reductions in Pennsylvania. RGGI makes no sense for a state like Pennsylvania, which possesses an abundance of coal and natural gas resources, and as a result, has the most reliable, affordable and resilient portfolio of electric generation in the country. None of the other RGGI states can boast these natural resource and generation assets, nor do they generate the electricity they consume. Over the past few years, 16 new natural gas plants have been built (at a cost of nearly \$16 billion) in Pennsylvania as a result of access to low-cost, reliable natural gas reserves and our competitive market, which will be undermined by the RGGI tax. The adoption of RGGI will mark an unprecedented action by the Commonwealth - the use of a regulation to destroy an industry and impose direct economic harm on Pennsylvania communities. It is the fiduciary obligation of the IRRC to intercede on behalf of the citizens of the Commonwealth, and on behalf of the affected communities that have been denied their legal right to confront the bureaucracy that seeks to destroy their lives and livelihoods, and to reject this harmful regulation, lacking basis in Pennsylvania law, for the political power play that it is, and stop it from proceeding. The PADEP's own Small Business Advisory Committee (SBAC), along with two other PADEP advisory committees - the Air Quality Technical Advisory Committee and the Citizens Advisory Council - rejected the draft RGGI regulation. Why? Because RGGI, while entirely lacking in identifiable environmental, health or safety benefits, will devastate businesses in impacted communities and increase electric rates for Pennsylvania business owners. To add insult to injury, in spite of Governor Wolf's promise for "robust and public outreach" to impacted workers and communities, the Wolf Administration is now manipulating the regulatory process to eliminate any meaningful opportunity for the general public to get involved. The so-called public comment period will run between November 7, 2020 and January 14, 2021 a sixty-nine-day period during which there will be three national holidays and the General Assembly, by constitutional mandate, is forced to end its two-year legislative session on November 30, 2020. Further, it is unlikely that the General Assembly oversight committees, which are intended to play a prominent role in the

regulatory process, will even be formed until February 2021, well after the end of the public comment period. In addition, and in direct violation of the Air Pollution Control Act (APCA), the so-called public hearings include five days of ten double session virtual hearings in mid-December, and none will be held in the impacted communities, as required by law. 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.

No attachments were included as part of this comment.

Please contact me if you have any questions.

Sincerely,
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