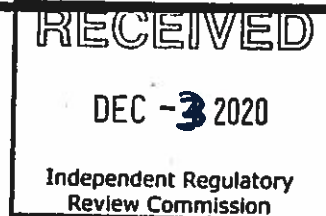


3274

Form Letter F 1-18

Stephen Hoffman

From: Beverly Rae <Beverly.Rae.221639656@p2a.co>
Sent: Thursday, December 3, 2020 3:12 PM
To: IRRC
Subject: I Support Proposed Regulation 50 Pa. B. 6212



CAUTION: ****EXTERNAL SENDER**** This email originated from outside of the organization. Do not click links or open attachments unless you recognize the sender and know the content is safe.

Dear the Independent Regulatory Review Commission,

I am in support of proposed regulation: Carbon Dioxide (CO₂) Budget Trading Program, to amend 25 Pa. Code Chapter 145. The proposed regulation was posted on Saturday, November 7, 2020 (50 Pa.B. 6212).

This proposed rulemaking would establish a program to limit emission of CO₂ from fossil-fired electric generating units (EGUs), with a nameplate capacity equal to or greater than 25 megawatts (MWe). This proposed rulemaking will not only greatly impact the environment, it will also benefit the economy, improve human health, and protect agriculture and tourism.

According to the United States Energy Information Administration, Pennsylvania generates the fifth most CO₂ emissions from EGUs in the country. CO₂ emissions are a major contributor to regional climate change impacts. This proposed regulation and program would help reduce CO₂ emissions greatly and by doing so, ultimately help this Commonwealth in terms of human health, environmental impacts, and our economy.

Under the Regulatory Review Act, certain criteria must be considered and met in order for a proposed regulation to be approved and finalized. Some of these criteria are already explained quite well in the Department of Environmental Protection's (DEP) Regulatory Analysis Form (RAF) and do not need further discussion. Some of these criteria include, statutory authority, clarity, feasibility, and reasonableness, supported by acceptable data, impacts to small businesses and meeting regulatory requirements.

For purposes of this letter, I will focus on the great public health, environmental, and economic benefits the proposed regulation will establish to change the Commonwealth's harmful trajectory due to greenhouse effects.

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By changing the trajectory of climate change, we can help our agricultural community and food security in the Commonwealth. Climate change is upending normal weather patterns, leading to periods of both intense precipitation and drought, both of which pose great difficulties for Pennsylvania farmers. Increased precipitation leads to difficulty in planting crops and harvesting meaningful yields and an increase in plant disease and destruction caused by pests. In the inverse, more frequent droughts will require an increase in irrigation to sustain crops and may lead to a large decrease in water quantity throughout the Commonwealth. Higher temperatures also impact livestock such as dairy cows and poultry. Stress caused by heat will decrease milk and egg production. To mitigate, the farmers will have to include purchasing extensive, and potentially expensive, cooling systems to protect the animals.

Further, forests and plants that typically help by naturally reducing carbon dioxide, can also become overwhelmed and stressed if changes are not made to CO₂ emissions. Higher temperatures and ground level ozone can contribute to destroying chlorophyll, reducing survivability of tree seedlings, and increasing plant disease and pests. These impacts to our forested and natural areas can ultimately impact outdoor recreation and tourism. Currently, during this pandemic it has been shown that outdoor recreation has been utilized much more and has helped with both mental, physical, and emotional health.

Without making changes in greenhouse gas emissions in this Commonwealth, water quantity and quality will be greatly impacted. Climate change is leading to sea level rises, which greatly impacts the Delaware River estuary and Philadelphia's drinking water supplies. It also leads to flooding and nutrients rushing into our local waters which can and has led to harmful algal blooms. Higher temperatures in local waters also leads to problems with aquatic species spawning and more. Native fish may need to migrate to cooler areas to survive, impacting Pennsylvania's sport fishing and more. Swimming and recreating in local waters can become increasing dangerous due to poor water quality from increased pathogens. Many of these incidences are currently happening throughout the state and is not uncommon. However, these incidences will continue to increase if changes do not take place to mitigate the harm. These proposed regulations provide the change that is needed.

Finally, approving these proposed regulations would be in line with our state Constitution, specifically, Article I, Section 27 by ensuring that Pennsylvanians are receiving their fundamental right to clean air and pure water. These types of regulations are exactly how the Commonwealth acts as a trustee in accordance with the Constitution. By keeping our citizen's interests in mind and acting with prudence and loyalty by proposing and approving regulations that reduce CO₂ will help to conserve and maintain our air and waters for generation yet to come as required by the state Constitution.

Economic Impacts:

The proposed rulemaking will not only combat climate change, as discussed above, but will provide a positive economic value to the Commonwealth. According to the modeling shown within the RAF, between the years 2022-2030 this proposed rulemaking will lead to a Gross State Product of \$1.9 billion and net increase of 27,752 jobs within the Commonwealth. There are also many other economic benefits that may be more difficult to project but will certainly be impactful to the Commonwealth. These benefits will come from less emergency funding having to be spent for extreme weather events, such as increased flooding, increased droughts, and tornado/storm damage. The Commonwealth will have less infrastructure damage caused by flooding, outdoor recreation and tourism industries will be protected, drinking water issues and costs (in protecting water quality

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Sincerely,
Beverly Rae

Stephen Hoffman

From: Bob Gallagher <Bob.Gallagher.234324174@p2a.co>
Sent: Thursday, December 3, 2020 9:15 AM
To: IRRC
Subject: I Support Proposed Regulation 50 Pa. B. 6212

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Sincerely,
Bob Gallagher

Stephen Hoffman

From: David Casker <David.Casker.299187509@p2a.co>
Sent: Thursday, December 3, 2020 11:24 AM
To: IRRC
Subject: I Support Proposed Regulation 50 Pa. B. 6212

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Sincerely,
David Casker

Stephen Hoffman

From: Frances Homer <Frances.Homer.226982902@p2a.co>
Sent: Thursday, December 3, 2020 1:27 PM
To: IRRC
Subject: I Support Proposed Regulation 50 Pa. B. 6212

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Frances Homer

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From: Jennifer Shirk <Jennifer.Shirk.221597987@p2a.co>
Sent: Thursday, December 3, 2020 1:03 PM
To: IRRRC
Subject: I Support Proposed Regulation 50 Pa. B. 6212

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Sincerely,
Jennifer Shirk

Stephen Hoffman

From: Joel Fishman <Joel.Fishman.393985878@p2a.co>
Sent: Thursday, December 3, 2020 10:10 AM
To: IRRC
Subject: I Support Proposed Regulation 50 Pa. B. 6212

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Sincerely,
Joel Fishman

Stephen Hoffman

From: Judith Bohler <Judith.Bohler.221602764@p2a.co>
Sent: Thursday, December 3, 2020 10:10 AM
To: IRRC
Subject: I Support Proposed Regulation 50 Pa. B. 6212

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Sincerely,
Judith Bohler

Stephen Hoffman

From: Judy Scriptunas <Judy.Scriptunas.391315242@p2a.co>
Sent: Thursday, December 3, 2020 11:16 AM
To: IRRC
Subject: I Support Proposed Regulation 50 Pa. B. 6212

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From: Katherine Jueds <Katherine.Jueds.242517405@p2a.co>
Sent: Thursday, December 3, 2020 9:17 AM
To: IRRC
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This proposed rulemaking is a two-prong approach. It is both a market-based trading program as well as an investment program. The RAF explains that the proceeds generated from the multistate auction may generate around \$339 million in 2022 and around \$190 million in 2030 by selling CO2 allowances. These proceeds can then be distributed within the Commonwealth in a variety of beneficial ways such as investing in energy efficiency, renewable energy, and greenhouse gas (GHG) abatement. Ultimately, these investments also have ripple effects in that the proceeds to invest in energy efficiency and renewable energy will help offset any potential increased costs to electricity prices by decreasing peak demand and offering low-cost electricity to the grid.

The direct and indirect positive impacts that this proposed regulation has on our Commonwealth is extensive: from our economy and the environment to our agriculture and food security to our health and welfare. Reducing CO2 through a practical, innovative, and expansive, regional market and investment program as designed by this propose rulemaking will help mitigate those harms created by GHGs.

Sincerely,
Katherine Jueds

Stephen Hoffman

From: Marian Mientus <Marian.Mientus.238124659@p2a.co>
Sent: Thursday, December 3, 2020 9:00 AM
To: IRRC
Subject: I Support Proposed Regulation 50 Pa. B. 6212

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According to the United States Energy Information Administration, Pennsylvania generates the fifth most CO₂ emissions from EGUs in the country. CO₂ emissions are a major contributor to regional climate change impacts. This proposed regulation and program would help reduce CO₂ emissions greatly and by doing so, ultimately help this Commonwealth in terms of human health, environmental impacts, and our economy.

Under the Regulatory Review Act, certain criteria must be considered and met in order for a proposed regulation to be approved and finalized. Some of these criteria are already explained quite well in the Department of Environmental Protection's (DEP) Regulatory Analysis Form (RAF) and do not need further discussion. Some of these criteria include, statutory authority, clarity, feasibility, and reasonableness, supported by acceptable data, impacts to small businesses and meeting regulatory requirements.

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By changing the trajectory of climate change, we can help our agricultural community and food security in the Commonwealth. Climate change is upending normal weather patterns, leading to periods of both intense precipitation and drought, both of which pose great difficulties for Pennsylvania farmers. Increased precipitation leads to difficulty in planting crops and harvesting meaningful yields and an increase in plant disease and destruction caused by pests. In the inverse, more frequent droughts will require an increase in irrigation to sustain crops and may lead to a large decrease in water quantity throughout the Commonwealth. Higher temperatures also impact livestock such as dairy cows and poultry. Stress caused by heat will decrease milk and egg production. To mitigate, the farmers will have to include purchasing extensive, and potentially expensive, cooling systems to protect the animals.

Further, forests and plants that typically help by naturally reducing carbon dioxide, can also become overwhelmed and stressed if changes are not made to CO₂ emissions. Higher temperatures and ground level ozone can contribute to destroying chlorophyll, reducing survivability of tree seedlings, and increasing plant disease and pests. These impacts to our forested and natural areas can ultimately impact outdoor recreation and tourism. Currently, during this pandemic it has been shown that outdoor recreation has been utilized much more and has helped with both mental, physical, and emotional health.

Without making changes in greenhouse gas emissions in this Commonwealth, water quantity and quality will be greatly impacted. Climate change is leading to sea level rises, which greatly impacts the Delaware River estuary and Philadelphia's drinking water supplies. It also leads to flooding and nutrients rushing into our local waters which can and has led to harmful algal blooms. Higher temperatures in local waters also leads to problems with aquatic species spawning and more. Native fish may need to migrate to cooler areas to survive, impacting Pennsylvania's sport fishing and more. Swimming and recreating in local waters can become increasingly dangerous due to poor water quality from increased pathogens. Many of these incidences are currently happening throughout the state and is not uncommon. However, these incidences will continue to increase if changes do not take place to mitigate the harm. These proposed regulations provide the change that is needed.

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Sincerely,
Marian Mientus

Stephen Hoffman

From: Michael Lawrence <Michael.Lawrence.391287857@p2a.co>
Sent: Thursday, December 3, 2020 10:22 AM
To: IRRRC
Subject: I Support Proposed Regulation 50 Pa. B. 6212

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Sincerely,
Michael Lawrence

Stephen Hoffman

From: Michael Lombardi <Michael.Lombardi.221666403@p2a.co>
Sent: Thursday, December 3, 2020 11:15 AM
To: IRRC
Subject: I Support Proposed Regulation 50 Pa. B. 6212

CAUTION: ****EXTERNAL SENDER**** This email originated from outside of the organization. Do not click links or open attachments unless you recognize the sender and know the content is safe.

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Sincerely,
Michael Lombardi

Stephen Hoffman

From: Neil Clark <Neil.Clark.252141339@p2a.co>
Sent: Thursday, December 3, 2020 12:54 PM
To: IRRC
Subject: I Support Proposed Regulation 50 Pa. B. 6212

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Neil Clark

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From: Tim Ivers <Tim.Ivers.312618243@p2a.co>
Sent: Thursday, December 3, 2020 9:29 AM
To: IRRC
Subject: I Support Proposed Regulation 50 Pa. B. 6212

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Sincerely,
Tim Ivers

Stephen Hoffman

From: Vickie McMurray <Vickie.McMurray.360593671@p2a.co>
Sent: Thursday, December 3, 2020 1:31 PM
To: IRRRC
Subject: I Support Proposed Regulation 50 Pa. B. 6212

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Sincerely,
Vickie McMurray

Stephen Hoffman

From: Willam Ridgeway <Willam.Ridgeway.285740699@p2a.co>
Sent: Thursday, December 3, 2020 1:43 PM
To: IRRC
Subject: I Support Proposed Regulation 50 Pa. B. 6212

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Willam Ridgeway

Stephen Hoffman

From: William Mulrennan <William.Mulrennan.221598508@p2a.co>
Sent: Thursday, December 3, 2020 4:17 PM
To: IRRC
Subject: I Support Proposed Regulation 50 Pa. B. 6212

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Finally, approving these proposed regulations would be in line with our state Constitution, specifically, Article I, Section 27 by ensuring that Pennsylvanians are receiving their fundamental right to clean air and pure water. These types of regulations are exactly how the Commonwealth acts as a trustee in accordance with the Constitution. By keeping our citizen's interests in mind and acting with prudence and loyalty by proposing and approving regulations that reduce CO2 will help to conserve and maintain our air and waters for generation yet to come as required by the state Constitution.

Economic Impacts:

The proposed rulemaking will not only combat climate change, as discussed above, but will provide a positive economic value to the Commonwealth. According to the modeling shown within the RAF, between the years 2022-2030 this proposed rulemaking will lead to a Gross State Product of \$1.9 billion and net increase of 27,752 jobs within the Commonwealth. There are also many other economic benefits that may be more difficult to project but will certainly be impactful to the Commonwealth. These benefits will come from less emergency funding having to be spent for extreme weather events, such as increased flooding, increased droughts, and tornado/storm damage. The Commonwealth will have less infrastructure damage caused by flooding, outdoor recreation and tourism industries will be protected, drinking water issues and costs (in protecting water quality

and improving quality) will be mitigated, and more. The benefits will be felt by citizens too: fewer extreme weather events will lead to less crop and livestock damage, decrease in health-related impacts and healthcare (for example, asthma), fewer pest related problems in agriculture and humans (such as Spotted Lanternflies and tick-borne diseases).

This proposed rulemaking is a two-prong approach. It is both a market-based trading program as well as an investment program. The RAF explains that the proceeds generated from the multistate auction may generate around \$339 million in 2022 and around \$190 million in 2030 by selling CO2 allowances. These proceeds can then be distributed within the Commonwealth in a variety of beneficial ways such as investing in energy efficiency, renewable energy, and greenhouse gas (GHG) abatement. Ultimately, these investments also have ripple effects in that the proceeds to invest in energy efficiency and renewable energy will help offset any potential increased costs to electricity prices by decreasing peak demand and offering low-cost electricity to the grid.

The direct and indirect positive impacts that this proposed regulation has on our Commonwealth is extensive: from our economy and the environment to our agriculture and food security to our health and welfare. Reducing CO2 through a practical, innovative, and expansive, regional market and investment program as designed by this propose rulemaking will help mitigate those harms created by GHGs.

Sincerely,
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