independent Regulatory

Testimony for CO2 Budget Trading Program Regulation

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My name is Matthew Lockhart and I am a lifelong resident of Indiana County. I felt compelled to speak today to voice my strong opposition to Governor Wolf's CO2 Budget Trading Program and urge its rejection. If Pennsylvania were to adopt this regulation it would result in the devastation of my community's local economy, cause irreparable damage to our local school districts due to the loss of tax revenue and result in negligible impact on regional CO2 emissions.

When Governor Wolf announced his intention to enter into RGGI, he promised robust public outreach and DEP's EQB rules as stated in their proposed rulemaking require that public hearings be held in the impacted areas in accordance with the Air Pollution Control Act. These public hearings should be taking place in Indiana County where according to our County Commissioners this regulation will directly affect \$1.3 billion of economic impact and 1,225 jobs related to coal mining and power generation. These virtual hearings are a disservice to our community. In the middle of this devastating pandemic I understand the problem with in person hearings. However that is not an excuse to ignore the rules already set forth in the regulation, but rather an argument that now is just not the time to push forward with this program or at the very least the timeframe for public comment should be extended until in person hearings can be held. The people who will feel the brunt of the impact of this regulation deserve to be able to have these discussions face to face, Indiana County is owed at least this much. This regulation is being force-fed to Pennsylvanians without any concrete plan of how these funds will be spent, especially in the areas of the state who's economy relies so heavily on revenue from the industry DEP is determined to kill. Holding these virtual hearings have allowed this regulation to fly under the radar and does not truly give those in the most affected communities a chance to hear first hand the damage this will inflict on their community.

I am very concerned that this regulation will have negligible impact on regional CO2 emissions, which is the regulations stated intent. As part of the PJM grid if these PA coal fired power plants and some natural gas power plants are forced to close, the lost generation will be picked up by other coal power plants just across the border into Ohio and West Virginia. These states have made it clear they have no intention of joining RGGI because they know their generation will become even more profitable when this heavy tax burden is placed on PA generation. Why would Pennsylvania want to give up the great economic benefits of being an electricity exporter only to inflict irreparable damage to these small communities and send the economic benefits out of the state.

Entering into RGGI or any CO2 regulation program is a decision too large for one person to make. It is a decision that should be made by our elected legislature who are most in touch

with their respective districts. I believe this is something that every state currently in RGGI would agree with as they entered into RGGI through legislative action not executive action.

While our state is still struggling to recover from the economic hardship of COVID-19 now is not the time to destroy the communities around these power plants and further burden every Pennsylvanian with higher electricity costs. DEP's own modeling confirms that this regulation will result in the immediate increase in PA electricity costs, but that they hope this will be temporary. The hope that this will be a temporary increase doesn't add up considering that RGGI states currently pay on average 50% more for electricity than Pennsylvanians do. Now more than ever is not the time to burden Pennsylvanians with this new tax which at the end of the day will only export the positive economic impact of power generation to other states while shifting CO2 emissions to neighboring states rather than truly lowering them.

Thank you for the opportunity to speak today. I hope that you will take my comments into consideration and I ask that you reject this proposed regulation.