

**Stephen Hoffman**

From: ecomment@pa.gov
Sent: Friday, December 11, 2020 11:07 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:

Liz Fairchild
Business Forward (efairchild@businessfwd.org)
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Comments entered:

Good afternoon. My name is Liz Fairchild, and I'm the Executive Director of Business Forward, an organization that works with more than 100,000 business leaders across the country, including more than 6,000 here in Pennsylvania.

We've organized hundreds of briefings on clean energy, climate change, and energy security. These briefings have included two Secretaries of Energy, two EPA Administrators, dozens of U.S. Senators, Congressmen and women, and hundreds of other officials.

I'm here to voice strong support for RGGI on behalf of the local business leaders with whom we work in Pennsylvania. Opponents of RGGI argue it will cost the Commonwealth jobs in the coal industry. But unfortunately, those jobs are already being lost due to the inevitable market shift from coal to gas and renewables. RGGI raises revenue from that transition, which Pennsylvania can reinvest in building a clean energy economy for the future.

Pennsylvania business leaders in our network support RGGI because they are concerned about severe weather distorting commodity prices, disrupting supply chains, damaging plants and equipment, and hurting consumer demand. They understand that severe weather threatens the rail, water, and highway infrastructure in the Commonwealth; and they understand the impact on Pennsylvania farms - reducing crop yields, increasing water costs, and increasing frost and

drought risk. Furthermore, they see RGGI as an opportunity to spur a long-lasting economic recovery through innovation of clean technologies and investment in energy efficiency.

As the second largest energy producer in the nation, RGGI would raise significant revenue for Pennsylvania: analysis projects \$320 million in 2022, and \$2.4 billion by 2030. Those dollars would be reinvested in clean air projects, energy efficiency, good jobs, and consumer relief.

Participating RGGI states have invested more than half their proceeds into energy efficiency, generating more than \$4 billion in economic benefits. These benefits have taken the form of new jobs, customer utility bill savings, and public-private investment, and they all work toward making the energy landscape more equitable, which should be a priority in Pennsylvania.

Given the current recession, support for low and middle-income customers is critical right now. Investments of auction proceeds should prioritize eliminating the economic and structural barriers that prevent disadvantaged residents and small businesses from accessing state-offered energy efficiency programs. When more people are able to participate, more energy is saved, more emissions are curtailed, and the cost of energy drops for more people.

Our business leaders in Pennsylvania recognize that investing in energy efficiency is the largest, most reliable job creator among all energy sectors. By 2030, RGGI could create 27,000 jobs and \$1.9 billion in gross state product in the state, and these are the jobs that will be the core of Pennsylvania's energy economy in 10 years. Once Pennsylvania officially joins RGGI, energy efficiency workers will be in increasing demand to build, install, monitor, repair, and improve equipment. These jobs offer a higher-than-average salary and cannot be outsourced.

RGGI proceeds can fund training centers that provide the necessary coursework for new energy workers, and develop career pathways with vocational and community schools across Pennsylvania. Over time, this will help meet the workforce development needs of an aging energy workforce.

RGGI has a strong track record. In its first decade, participating states saw a 47 percent reduction in emissions, nearly twice the rate of non-RGGI states. Over that same period, the GDP of RGGI states grew by 47 percent while electricity prices remained low. From 2008 to 2017, electricity prices in RGGI states fell by 5.7 percent, while prices increased by 8.6 percent elsewhere.

Ultimately, business leaders in Pennsylvania see RGGI as an opportunity to mitigate severe weather risks, raise revenue from the energy transition, lower energy costs for consumers and small businesses, and spur economic growth by investing in energy efficiency, innovation, and the clean energy workforce.

Thank you for your time today. Above all, I encourage the DEP to act quickly to develop a RGGI rule that prioritizes investment in energy efficiency, which is best positioned to lower customer bills, reduce emissions, create jobs, and power Pennsylvania's economic recovery.

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

Comments Attachment: [Pennsylvania-climate-risk-report.pdf](#)

Comments Attachment: [RGGI report.pdf](#)

Please contact me if you have any questions.

Sincerely,
Jessica Shirley

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