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Stephen Hoffman	Dec	15 2020
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Cc:	c-jflanaga@pa.gov	
Subject:	Comment received - Proposed Rulemaking: CO2 Budget Trading Program (#7-	559)

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The enclosed comment was received as part of the following testimony:

Testimony name: Public Hearing 4 (6pm) - #7-559 Testimony date: 12/9/2020 12:00:00 AM Testimony location: WebEx

Re: eComment System

The Department of Environmental Protection has received the following comments on Proposed Rulemaking: CO2 Budget Trading Program (#7-559).

Commenter Information:

Erich Everbach (ceverba1@swarthmore.edu) 212 Dogwood Lane Wallingford, PA 19086 US

Comments entered:

As a Pennsylvania resident for 30 years and an Engineering Professor at Swarthmore College also for 30 years, I have studied and taught about the evolution of technologies, from the wheel to the satellite. I have also taught courses on the steam engine, the internal combustion engine, solar energy systems and wind turbine design. It is time for fossil fuel technologies to gradually pass into history and be replaced by low-carbon-emitting technologies like wind and solar. This transition requires policies such as a CO2 budget trading program like RGGI, and I offer testimony now for why.

In my Solar Energy Systems class, my students and I consider smart-grid technology policy and even take a field trip to PJM Interconnect, the Northeast Electric Grid operator. I teach how the spot market and day-ahead market for production of megawatts sets the price, and determines the incentives, both for production by power-producing entities like PECO, and also for reduction in demand by entities like Swarthmore College. A cap-and-trade program such as RGGI has been effective in reducing both carbon emissions and the costs of those emissions reductions

over time. This market-based mechanism is the most efficient way we know to reduce emissions.

But why reduce emissions? What about clean coal? Burning natural gas is cleaner than burning coal and it is inexpensive in Pennsylvania, so why do we need RGGI?

It is true that hydraulic fracturing has produced more inexpensive natural gas, but has also produced huge methane emissions, much worse than the savings in the switch from coal. Currently we do not charge anyone for venting methane, or leaking accidentally from wellheads or pipelines. Despite technological advances, there is no clean way to mine coal, or extract frack gas, or move those products without pipeline leaks and danger to Pennsylvanians. The reason we need RGGI is to incentivize innovation. Americans are very good at innovation, if public policy entities like Pennsylvania's DEP provide the right incentives.

Why reduce emissions? How about these reasons: Particulate pollution and increases in asthma, bronchitis, and other diseases which are expensive and tragic in children especially because these diseases last their whole lives. Something like 6 billion dollars can be saved in health care costs in Pennsylvania through 2030 due to reduced pollution.

Carbon in the atmosphere which is going to result in greater storms and droughts, loss of crops, mass migration of people and an existential threat to the lives that Pennsylvanians hold dear. Global climate change is not a hoax, and it is already starting to bite us. According to the UNFCCC, carbon reductions have got to be aggressive before 2030 or we may tip the climate into something very different from what Pennsylvania has been founded on. This is an irreversible change after a certain point, so we need to act now.

Finally, Pennsylvania should participate in the green economy that is coming, indeed is already here, showing leadership among the states and employing workers from fossil fuel companies. You know the estimates as well as I do, but clearly tens of thousands of good jobs are coming if we move forward with green infrastructure, which relies on low-carbon electricity. These are good reasons to incentivize low-carbon technologies over fossil fuels in the most efficient manner possible.

Joining the other regional partner states in RGGI is what Pennsylvania needs now. I urge you to do the right thing for our workers, our asthmatic children and elders, our land, air, and water, and the future generations of Pennsylvanians. History has its eyes on you.

No attachments were included as part of this comment.

Please contact me if you have any questions.

Sincerely, Jessica Shirley

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