



Stephen Hoffman

From: ecomment@pa.gov
Sent: Sunday, December 13, 2020 11:25 AM
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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:

Jennifer Pavao
 Lower Merion Township EAC (jenhpavao@gmail.com)
 531 New Gulph Rd
 Haverford, PA 19041-1621 US

Comments entered:

December 10, 2020

Thank you for the opportunity to testify in support of Pennsylvania joining RGGI. I am speaking as a private citizen today. I am a retired physician trained in Internal Medicine and currently serve my Township of 60K on the Environmental Advisory Council. I reside in Southeastern Pennsylvania in Montgomery County, a suburb of Philadelphia.

Since 2009, carbon emissions from power plants in the RGGI states have fallen by more than half, 90% faster than in the rest of the country, while economic growth in the RGGI states has outpaced the rest of the country by 3%.

What does RGGI mean for Pennsylvania?

By participating in RGGI Pennsylvania will reduce climate pollution from carbon emissions by a massive 188 million tons by 2030 according to the DEP. Emission of other harmful pollutants like nitrogen oxides, sulfur dioxide, and particulate matter emissions will also drop significantly. These reductions will particularly benefit those most often impacted by marginal air quality, such as children and at-risk seniors, especially in low-income communities and communities of color in Philadelphia.

DEP's modeling also estimates that from 2022 to 2030, participating in RGGI would lead to an increase in Gross State Product of nearly \$2 billion and a net increase of over 27,000 jobs in this Commonwealth. The results also show that overall citizens of this Commonwealth could see a cumulative increase in disposable personal income of \$3.7 billion by 2050. These estimates are

at the low end because they do not include investments of RGGI revenues in things like energy efficiency improvements for businesses and homeowners, economic support for communities that see changes resulting from changing electricity generation and usage, and clean energy sources.

A cap on carbon emissions from electricity is critical, but it won't solve all of Pennsylvania's energy problems. The state also needs to address methane emissions, which have over 80 times the warming power of carbon dioxide over a 20-year time frame. The state's methane emissions are estimated to be five times higher than what oil and gas companies report to the state Department of Environmental Protection.

Moving forward, Pennsylvania should also consider expanding its policy of putting a price on greenhouse gas emissions from the electricity sector to the rest of its economy. Pennsylvania is already a member of the Transportation and Climate Initiative (TCI) — a regional collaboration of 13 New England and Mid-Atlantic states that aims to develop regional and market-based policies to reduce carbon emissions from transportation.

Despite the demonstrated environmental, health and economic benefits, there is fear the RGGI will result in job losses and devastate the economies of some communities in Pennsylvania and will result in higher energy prices.

Like others, I urge DEP and EQB to consider allocating any proceeds from RGGI to help low income communities, displaced workers as well as invest in renewable, and alternative energy, and grid infrastructure.

Join RGGI so Pennsylvania can capitalize on the inevitable transition to carbon-free like other states;

Join RGGI so the proceeds can be used to help the economy recovery from the Covid pandemic;

Join RGGI but don't stop there. Let's move this forward.

Thanks again,
Jennifer Pavao, MD
Lower Merion Township EAC
Sustainability Planning
Haverford, Pennsylvania

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

Comments Attachment: [In support of Pennsylvania joining RGGI.docx](#)

Please contact me if you have any questions.

Sincerely,
Jessica Shirley

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