



**BUILDING
PERFORMANCE**
ASSOCIATION

December 10, 2020

Submitted via email at RegComments@pa.gov

Commonwealth of Pennsylvania
Environmental Quality Board
P.O. Box 8477
Harrisburg, PA 17105-8477

Re: Testimony for CO2 Budget Trading Program Regulation
Proposed Environmental Quality Board Rulemaking
Pennsylvania Bulletin, Vol. 50, NO. 45, Page 6212 – November 7, 2020
Virtual Public Hearing: 1:00PM on December 10, 2020 – Slot #10

The Building Performance Association (BPA) appreciates the opportunity to provide testimony on the Environmental Quality Board's (EQB) proposed amendment to Chapter 145 to establish a trading program for carbon dioxide emissions - the CO2 Budget Trading Program Regulation. BPA salutes the EQB's commitment of time and resources to holding this public hearing and for engaging small businesses and entrepreneurs from the energy efficiency industry and other clean energy business leaders in Pennsylvania. ***BPA supports the adoption of the CO2 Budget Trading Program Regulation because doing so will help create jobs in the Commonwealth.***

Background on the Building Performance Association

BPA is a membership-driven 501(c)(6) industry trade association focused on the home and building performance industry - delivering improved energy efficiency, health, safety, and environmental outcomes. Our national headquarters is based in Pennsylvania. BPA supports home performance contractors, weatherization agencies and training centers, energy efficiency manufacturers and suppliers, small businesses, and local non-profits focused on residential and commercial energy efficiency.

BPA's 748 Pennsylvania members and affiliates provide the "nuts and bolts" of efficiency upgrades to homes and buildings across the state. We salute the high-quality services that our members and affiliates deliver and the skilled jobs that they create in communities across the Commonwealth. BPA is proud to serve 11,320 members across the United States.

Energy Efficiency and Job Creation in Pennsylvania

We urge the EQB to approve the CO2 Budget Trading Program Regulation because it will help increase the **68,820 energy efficiency jobs** in Pennsylvania, many of which are part of a highly skilled workforce. We see firsthand every day that Pennsylvanians value the energy efficiency programs that add new insulation in homes, upgrade lighting in schools, and install new equipment in manufacturing facilities and help residents and businesses save money on their utility bills. Our customers are grateful for buildings and homes that are more comfortable, healthier, and less expensive to maintain thanks to private sector market forces and the adoption and implementation of energy efficiency programs such as Act 129.

Pennsylvania Needs to Catch up with Other States on Energy Efficiency Jobs Creation

Joining the Regional Greenhouse Gas Initiative (“RGGI”) will help the Commonwealth catch up with neighboring states in the creation of energy efficiency jobs. BPA believes that the Commonwealth can do much better job on job creation in the energy efficiency market sector. BPA has seen that adopting RGGI is a valuable and proven tool that will get results. For example, participating RGGI states have invested over half their proceeds into energy efficiency, generating over \$4 billion in economic benefits.

In 2019, Pennsylvania ranked 41st in per capita employment among states in energy efficiency according to [Energy Efficiency Jobs in America](#) (See Attachment A). Pennsylvania’s per capita employment rate in energy efficiency jobs is approximately one half of the per capita employment rate in neighboring Maryland. Indiana and Ohio are also far ahead of Pennsylvania on the per capita job creation rates in the energy efficiency industry, one of the fastest growing energy sectors in the nation. Adopting RGGI will help the Commonwealth catch up in its job creation potential with other states in this critical market sector. A recently released fact sheet and analysis of energy efficiency jobs and trends in the Commonwealth is available at: <https://e4thefuture.org/wp-content/uploads/2020/11/PENNSYLVANIA.pdf>.

BPA has seen in states across the country that properly designed and implemented energy efficiency programs to be the lowest cost, most predictable and most immediate method to manage energy demand, create local jobs, provide opportunities for small business energy efficiency entrepreneurs while also providing health and comfort benefits to consumers and lower utility bills. By adopting the CO2 Budget Trading Program, Pennsylvania will be able to devote additional resources to economic development and energy efficiency programs that will provide critical post-COVID economic stimulus benefits to Pennsylvania.

BPA works with many states that have already moved forward and adopted innovative best practice policies that have created thousands of energy efficiency jobs and attracted significant private sector investments in this rapidly expanding industry. Joining RGGI is just one of these proven, best practice approaches to economic development. BPA stands ready to assist the Commonwealth in implementing other proven strategies to enhance job creation and private sector investments in energy efficiency.

Pennsylvania Can Keep Electricity Rates Low and Invest in Job Training for the Future

Participating RGGI states have invested over half their proceeds into energy efficiency, generating over \$4 billion in economic benefits. In addition to job creation benefits, other RGGI states have also been able to keep electric bills for customers low. Electricity wholesale prices dropped by 5.7% in RGGI states, even as the rest of the country saw increases of 8.6%.

Several of the RGGI states have also invested wisely in job training programs for new energy efficiency jobs. RGGI auction proceeds can fund training centers that provide the necessary coursework for new energy workers to succeed at energy efficiency careers. These programs can also develop career pathways with vocational and community schools across the state using RGGI proceeds. BPA believes that workforce development and training programs supported with RGGI based investments could play a critical role in moving the energy efficiency industry forward in the Commonwealth.

Conclusion

BPA appreciates this opportunity to provide comments on the adoption of the CO2 Budget Trading Program Regulation. There are often difficult and complex tradeoffs and calculations necessary to make policy choices when implementing a long-term economic development strategy. From an economic development and job creation perspective, this is not one of those occasions.

Moving forward expeditiously with the CO2 Budget Trading Program Regulation and joining RGGI will provide Pennsylvania's economy with a shot in the arm at a time when the Commonwealth's economy urgently needs to recover its footing.

Please feel free to contact BPA via my email listed below should you have any questions about the research and policy information provided in this Testimony.

Respectfully Submitted,



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US Energy Efficiency (EE) Jobs Per Capita by State

State	Gross EE Jobs	Population	EE Jobs Per Capita	Per Capita Rank	Gross Jobs Rank
DC	12,807	702,455	0.0182	1	36
VT	11,035	626,299	0.0176	2	41
WY	7,528	577,737	0.0130	3	45
DE	12,514	967,171	0.0129	4	38
MA	86,473	6,902,149	0.0125	5	7
RI	12,773	1,057,315	0.0121	6	37
MD	70,530	6,042,718	0.0117	7	11
WI	63,141	5,813,568	0.0109	8	14
OR	42,547	4,190,713	0.0102	9	20
UT	31,798	3,161,105	0.0101	10	25
CT	35,597	3,572,665	0.0100	11	23
VA	78,670	8,517,685	0.0092	12	10
NH	11,733	1,356,458	0.0086	13	39
MI	85,061	9,995,915	0.0085	14	8
SD	7,496	882,235	0.0085	15	46
WA	63,877	7,535,591	0.0085	16	13
NC	86,559	10,383,620	0.0083	17	6
IN	55,090	6,691,878	0.0082	18	16
MN	46,191	5,611,179	0.0082	19	18
MT	8,673	1,062,305	0.0082	20	43
CA	318,542	39,557,045	0.0081	21	1
TN	53,006	6,770,010	0.0078	22	17
ND	5,425	760,077	0.0071	23	50
IL	89,469	12,741,080	0.0070	24	5
NE	13,533	1,929,268	0.0070	25	35
OH	81,676	11,689,442	0.0070	26	9
MO	41,845	6,126,452	0.0068	27	21
IA	20,587	3,156,145	0.0065	28	30
ME	8,647	1,338,404	0.0065	29	44
NY	123,292	19,542,209	0.0063	30	3
AL	30,821	4,887,871	0.0063	31	26

State	Gross EE Jobs	Population	EE Jobs Per Capita	Per Capita Rank	Gross Jobs Rank
AK	4,617	737,438	0.0063	32	51
AZ	43,418	7,171,646	0.0061	33	19
CO	34,342	5,695,564	0.0060	34	24
KS	17,287	2,911,505	0.0059	35	31
SC	29,984	5,084,127	0.0059	36	27
GA	61,193	10,519,475	0.0058	37	15
KY	25,530	4,468,402	0.0057	38	28
TX	162,816	28,701,845	0.0057	39	2
FL	118,412	21,299,325	0.0056	40	4
PA	68,820	12,807,060	0.0054	41	12
MS	15,403	2,986,530	0.0052	42	32
AR	15,147	3,013,825	0.0050	43	33
ID	8,747	1,754,208	0.0050	44	42
LA	22,152	4,659,978	0.0048	45	29
HI	5,850	1,420,491	0.0041	46	48
NJ	36,206	8,908,520	0.0041	47	22
WV	6,844	1,805,832	0.0038	48	47
NV	11,155	3,034,392	0.0037	49	40
OK	14,372	3,943,079	0.0036	50	34
NM	5,636	2,095,428	0.0027	51	49

Sources: Energy Efficiency Jobs in America

Published September 2019.

Population numbers are US Census data from 2018

Unless otherwise stated, all data are from the 2019 U.S. Energy and Employment Report (March 2019), produced by the Energy Futures Initiative (EFI) in partnership with the National Association of State Energy Officials (NASEO) and collected and analyzed by BW Research Partnership (BWRP). The methodology for this report was adopted by the U.S. Dept. of Energy for its 2017 U.S. Energy and Employment Report (USEER).