RECEIVED Dec 17 2020 Independent Regulatory Review Commission

Stephen Hoffman	
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From:	ecomment@pa.gov	regulatory
Sent:	Thursday, December 17, 2020 1:58 PM	
То:	Environment-Committee@pasenate.com; IRRC; environmentalcommittee@pahou regcomments@pa.gov; ntroutman@pasen.gov; timothy.collins@pasenate.com; gking@pahousegop.com; siversen@pahouse.net	se.net;
Cc:	c-jflanaga@pa.gov	
Subject:	Comment received - Proposed Rulemaking: CO2 Budget Trading Program (#7-55	9)

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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:

Monet Raths None (popraqs@gmail.com) 4589 N Twin Valley Rd Elverson, PA 19520-9344 US

Comments entered:

I urge Pennsylvania to join the 10 states that are already members of RGGI and leading the way to a more habitable planet.

Pennsylvania has the fifth-dirtiest electric power sector in the country. Pennsylvania has a heightened responsibility to reduce its emissions.

While the RGGI only covers facilities generating electricity, it is a step in the right direction.

This CO2 Budget Trading Program will significantly reduce harmful carbon pollution and protect public health. Pennsylvania will generate hundreds of millions of dollars in proceeds annually from this program which must be invested in targeted efforts to eliminate air pollution through renewable energy programs, spur job creation, support working Pennsylvanians, and help boost the state's long-term economic recovery from the COVID-19 pandemic. It is important that a portion of the proceeds be used to help workers and communities who will be affected by the transition from coal and natural gas to cleaner sources of energy.

I urge the DEP to provide a mechanism to adjust the starting allowance budget if actual emissions are lower than currently projected. It can be challenging to accurately predict future emissions, and a cap that is set too high will affect the integrity of the program. I recommend amending the definition of legacy emissions. This account should be no larger than is necessary to cover actual emissions. Since 2018, four waste coal plants have retired. These plants should be removed from the calculation of legacy emissions as they will not exist in 2022. If waste coal-fired generation disappears in Pennsylvania, the waste coal set-aside account disappears and so, too, does the strategic use set-aside.

It is time to tap into RGGI's record of success, invest in sustainable jobs in our transitioning energy sector, and reduce our carbon pollution. Considering Governor Wolf's greenhouse gas reduction goals set forth in Executive Order 2019-01, participating in RGGI is an essential policy step for Pennsylvania.

As a state producing massive amounts of fossil fuel emissions, joining the Regional Greenhouse Gas Initiative (RGGI) is the right thing for Pennsylvania to do.

I urge the DEP to finalize this proposed rulemaking to allow Pennsylvania to participate in the Regional Greenhouse Gas Initiative (RGGI) beginning in January 2022.

Thank you for your consideration.

No attachments were included as part of this comment.

Please contact me if you have any questions.

Sincerely, Jessica Shirley

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