



## Stephen Hoffman

**From:** ecomment@pa.gov  
**Sent:** Wednesday, December 23, 2020 3:36 PM  
**To:** Environment-Committee@pasenate.com; IRRC; environmentalcommittee@pahouse.net; regcomments@pa.gov; ntroutman@pasen.gov; timothy.collins@pasenate.com; gking@pahousegop.com; siversen@pahouse.net  
**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:

Susan Babbitt  
 (philad49@att.net)  
 319 South Tenth Street, 133  
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Comments entered:

Dear DEP Regulatory Comments,

We must address and mitigate our outside contribution to climate change. I urge the Department of Environmental Protection to swiftly finalize this proposed rulemaking to allow Pennsylvania to participate in RGGI beginning in January 2022. Pennsylvania has the fifth-dirtiest electric power sector in the country, and this sector is responsible for roughly one-third of Pennsylvania's greenhouse gas pollution. RGGI participation would be offer great benefits.

This CO2 Budget Trading Program will significantly reduce harmful carbon pollution and protect public health. This has already been seen in states currently involved in the program. The proceeds from RGGI should be used for energy efficiency and renewable energy programs, to promote clean energy jobs and help worker transition from fossil fuel jobs and recovery from the pandemic economy.

I urge 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 acknowledge the problems posed by abandoned coal refuse piles but do not support the waste

coal set-aside. At minimum, I recommend amending the definition of legacy emissions, which determines the number of free allowances provided in the set-aside. 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.

I strongly support the strategic use set-aside account included in the proposed rule and urge that this set-aside account survive independently of the waste coal set-aside. As currently drafted, if waste coal-fired generation disappears in Pennsylvania, the waste coal set-aside account disappears and so, too, does the strategic use set-aside.

We must extend the success of RGGI to our state, reduce carbon pollution, and create truly good jobs. Governor Tom Wolf's greenhouse gas reduction goals are highly compatible with participation in RGGI. Thank you for your consideration

Sincerely,

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No attachments were included as part of this comment.

Please contact me if you have any questions.

Sincerely,  
Jessica Shirley

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