



## Stephen Hoffman

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**From:** ecomment@pa.gov  
**Sent:** Wednesday, December 30, 2020 4:32 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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The enclosed comment was received as part of the following testimony:

**Testimony name:** Public Hearing 6 (6pm) - #7-559  
**Testimony date:** 12/10/2020 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:

David Howell  
 Westinghouse Electric Company (mkriner@nextgenerationpartnersinc.com)

, PA US

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Comments entered:

Good evening, my name is David Howell. I am the President of Americas Operating Plant Services for Westinghouse Electric Company. I am here today representing approximately 3,000 Westinghouse employees in the Commonwealth of Pennsylvania and 9,000 employees worldwide. I have worked for Westinghouse and lived in Pennsylvania for the last 38 years. Pennsylvania is where it all started for Westinghouse, and it's where we are leading the way with a new generation of nuclear energy power plants. With 60% of the nuclear power operating fleet in the United States based on Westinghouse technology, our roots are planted firmly in the nuclear industry and in the state. From the design of the first commercial pressurized water reactor in the United States, built more than 60 years ago in Shippingport, Pennsylvania to the two new AP1000 nuclear plants under construction in the state of Georgia, we are committed to remaining the world's first choice for safe, clean and efficient energy solutions. We continue to drive nuclear research and development right here in Pennsylvania. This continued innovation has allowed us to work with our partners to develop products and services

for both existing and future clean energy markets. From our global headquarters in Cranberry Township, Pennsylvania, to our four major facilities in the Commonwealth, to the more than 20 regional offices and manufacturing facilities in the United States, we provide a complete range of services – engineering services, new plants, nuclear fuel, instrumentation & control, field services and plant modifications, and decontaminating & decommissioning. We provide these services not only in the United States but all around the world.

Nuclear energy is clean energy and is an ideal partner for the other clean and renewable sources of carbon-free electric generation. But none of these sources can provide baseload power every hour of every day. Nuclear power plants are the only carbon-free baseload electric generation source that can and do provide safe, reliable electricity 24 hours a day, 7 days a week, 365 days a year. In total, nuclear energy generates around 20% of U.S. electricity and more than half of the U.S.'s carbon-free electricity.

This hearing, on a CO2 Budget Trading Program and the question of whether Pennsylvania participates in the RGGI program, addresses an important policy question: How do we reduce greenhouse gases and still provide the needed electricity to heat our homes, power our businesses and grow our economy? Westinghouse believes that the best way to do this is to properly value clean energy and to retain our largest source of clean energy- nuclear power! There is currently no way for the markets to properly value the clean and reliable power that nuclear energy provides the state, region and country. It is our hope that the RGGI program can provide that value for Pennsylvania.

Westinghouse believes that the first step in making a serious commitment to reduce our carbon footprint is to build upon what is already in place. The U.S. nuclear industry is operating at the highest levels of efficiency and safety in history. At the same time, we have lost 6% of the U.S. nuclear energy generation fleet with the possibility of additional plant closures looming. As Pennsylvania considers joining RGGI, it is critical for everyone to understand the importance of keeping our existing nuclear plants operational. As Pennsylvania pledges to reduce carbon emissions, it must also make a commitment to value nuclear power and do everything it can to avoid closing any existing plants. We believe that the RGGI program could be a mechanism to provide appropriate value to nuclear energy. We strongly encourage the Governor and the General Assembly to work together and find a way to value the clean and reliable electricity that nuclear power provides. We hope that a significant portion of the revenues created by this program will be dedicated to meeting our carbon reduction goals by properly valuing nuclear energy.

There is no better example of the need for Pennsylvania to act now than the recent decision by Energy Harbor to rescind its previously announced shutdown order for the Beaver Valley nuclear facility. Their announcement specifically cited Pennsylvania's proposal to join RGGI in 2022. Exelon acknowledged the need for reform when they stated prior to the closure of Three Mile Island nuclear power plant, "that the station would prematurely shut down, absent policy reform, due to economic challenges and market flaws that fail to recognize the environmental and resiliency benefits from TMI and other zero-carbon nuclear energy plants across the Commonwealth".

We applaud Pennsylvania's efforts to reduce emissions by entering RGGI in January of 2022. We believe that the carbon-free baseload electric generation provided by nuclear plants is essential for Pennsylvania to reduce its carbon emissions by 163 million tons through 2030 as modeled by the Pennsylvania DEP. It is Westinghouse's belief that losing nuclear power plants to premature shutdowns will hamper efforts to reach these goals of reducing carbon emissions in the Commonwealth.

Thank you again for affording Westinghouse the opportunity to speak today on the critical importance of nuclear energy generation and the important role it will play in helping Pennsylvania meet its reduced carbon emission goals upon joining RGGI.

No attachments were included as part of this comment.

Please contact me if you have any questions.

Sincerely,  
Jessica Shirley

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