



**EVANGELICAL
ENVIRONMENTAL NETWORK**



December 10, 2020

**The Environmental Quality Board – CO₂ Budget Trading Program Regulations
50 Pa.B. 6212**

Dear Secretary McDonnell, DEP Staff, and The Environmental Quality Board,

I'm The Rev. Mitch Hescox, President/C.E.O. of The Evangelical Environmental Network. In addition to serving as EEN's president for 12 years, I pastored a Pennsylvania congregation for 18 years after working 14 years for the coal industry. My last position in Pennsylvania's manufacturing industry was as the Fuel Systems Manager for Allis Mineral Systems. There, I designed and sold grinding equipment for pulverized coal boilers around the world.

I'm a life-long registered Republican, a fiscal conservative, and grew-up in the small Cambria County coal mining village of Blandburg. Both of my grandfathers mined coal and had black-lung disease complications in their deaths. My late father worked as a coal miner for much of his life – including as a high school student on the 3rd shift during World War II, before a 1958 mine accident severely injured his back.

Today, I am here to speak in support Commonwealth of Pennsylvania joining the Regional Greenhouse Gas Initiative. I also wish to speak in support displaced coal and electric utility workers, and those frontline and economically disadvantaged individuals who are currently suffering the worst impacts of pollution. Workers and their families must be defended from increased economic burdens should RGGI standards not be implemented correctly.

The Bible states:

*He has shown you, O mortal, what is good.
And what does the Lord require of you?
To act justly and to love mercy
and to walk humbly with your God. – Micah 6:8 (NIV)*

First, I understand the fear in electric utility workers and coal miners – better than most because I lived through the same fear and job evaporations. However, the simple truth is that coal jobs will not return. Coal can no longer compete and joining RGGI will not hasten coal demise. However, if this highly

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trained and stilled workforce would quit chasing after ghosts, EEN and over 23,000 pro-life Pennsylvania Christians and counting who support joining RGGI, offer our pledge to ensure that a sizable portion of RGGI proceeds be used to insure a just transition and support new family sustaining jobs.

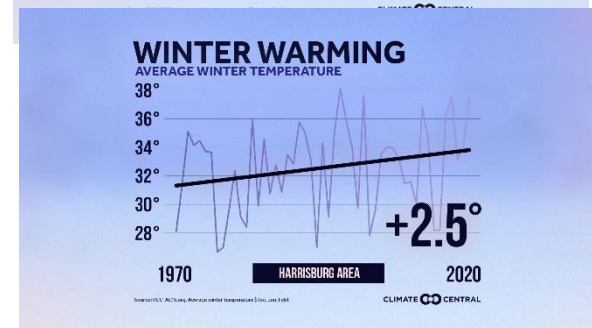
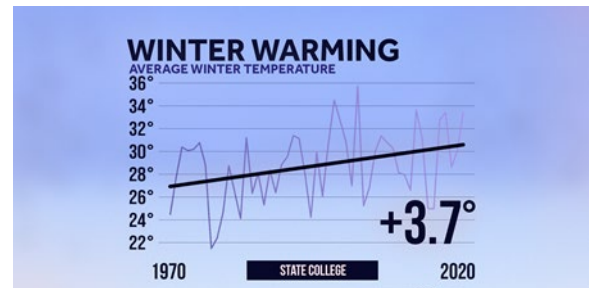
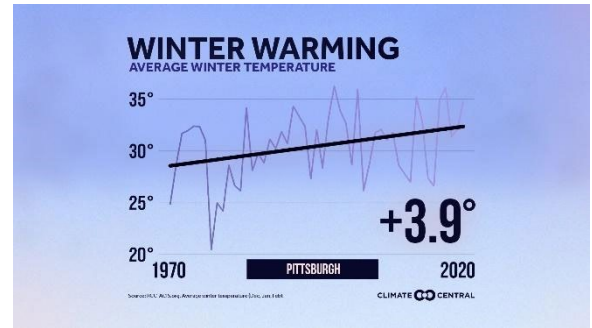
The same pledge is offered to people living with low incomes and who have suffered the worst from the fossil fuel pollution. In addition to supporting a just transition, some RGGI proceeds must be allocated for energy efficiency, weatherization, and supporting the move to already less expensive renewable energy.

It is past time to face reality. Climate change already impacts Pennsylvanians, and the threats will only worsen the longer we fail to act. Winter average temperature from 1970 to now has already increased 3.9°F for Pittsburgh, 3.7°F for Central Pennsylvania, 2.5°F for Harrisburg, and Philadelphia records a 4.8°F increase.

We are already starting to see the effects here in Pennsylvania, like stronger storms, increased flooding, heat related deaths, and vector borne illnesses such as Lyme Disease.

Climate Change, fossil fuel combustion, and leaking methane combine and contribute to Pennsylvania having some of the worst air quality in the nation. The American Lung Association's (ALA) most recent [State of the Air](#) report has again issued failing grades to both the Pittsburgh and Philadelphia metro areas for their poor air quality.

Over 257,000 of Pennsylvania's children and over 1 million Pennsylvania adults already battle asthma, largely a result of the pollution from fossil fuels. According to The American Lung Association's [State of the Air 2020](#), ozone (smog) levels are increasing across the nation, including in Pennsylvania, as climate change increases temperatures¹ and multiplies asthma attacks. Experiencing these attacks is traumatic. They prevent normal activity, decrease economic productivity, and are said to be akin to experiencing severe sunburn to the inside of the lungs. What's



¹ Data taken from Applied Climate Information Systems: <http://scacis.rcc-acis.org/>

more, increased temperatures also remain a leading factor in increased vector borne diseases such as Lyme Disease (with an estimated 120,000 cases per year in PA)² and West Nile Virus.

Another medical study concludes that over 2,700 Pennsylvanians died prematurely in 2018 due to Pennsylvania's generated air pollution sources including the electric generation industry. Our pollution is also believed to have contributed to more than 2,300 (2018) premature deaths in other states as well. All told, Pennsylvania holds the auspicious claim of having the third most air pollution-related deaths in the U.S., after California and New York.³

We are amid the greatest economic disruption since circa 1900 when the internal combustion engine replaced the horse as the primary means of transportation. However, as evangelical Christian, and a believer in a market economy, it's past time to correct the market failures and allow the market to flourish by correcting market failures providing brighter, cleaner, healthy, hope-filled new Pennsylvania.

As evangelical Christians, the Bible is still our authoritative text. As such, the Bible seems to at least recognize market-based economies. However, the Bible commands honesty and fairness as a prerequisite for market activity:

“Do not use dishonest standards when measuring length, weight, or quantity. Use honest scales and honest weights, an honest ephah and an honest hin. I am the Lord your God, who brought you out of Egypt.” –Leviticus 19:35-36 (NIV)

For over a century, the fossil fuel industry has received help from a dishonest measurement of costs. They have privatized the profits while much of the cost has been borne in the lungs, hearts, minds, and even lives of our children. This mass market failure continues into today as the external costs of fossil fuels continue to go ignored and unaccounted for, thereby creating a dishonest standard and false measurements.

² Igor Dumic, Edson Severnini. 'Ticking Bomb': The Impact of Climate Change on the Incidence of Lyme Disease. Canadian Journal of Infectious Diseases and Medical Microbiology, 2018; 2018: 1 DOI: 10.1155/2018/5719081

³Dedoussi, I.C., Eastham, S.D., Monier, E. et al. Premature mortality related to United States cross-state air pollution. Nature 578, 261–265 (2020). <https://doi.org/10.1038/s41586-020-1983-8>

To quantify these costs, Muller et. al. state that, “the largest industrial contributor to external costs is coal-fired electric generation, whose damages range from 0.8 to 5.6 times value added.”⁴ A more recent economic study⁵ finds the average external cost for various fuels types as such:

Coal	14.87 US cent/kWh
Oil	13.57 US cent/kWh
Gas	05.02 US cent/kWh
Nuclear	08.63 US cent/kWh
Wind	00.20 US cent/kWh
Solar	00.57 US cent/kWh

The energy market fails in fairness, honesty, and truth when it comes to fossil fuel energy production. The Regional Greenhouse Gas Initiative (RGGI) will help correct this market failure and support those who have suffered the worst impacts fossil fuel pollution and continue the development of a clean energy future that benefits our children now and in the future.

It's possible to create a clean energy economy. Lazard's most recent [Levelized Cost of Energy](#) (LCOE) analysis shows U.S. renewable energy prices continued falling fast in 2019, with wind and solar hitting new lows, after renewables fell below the cost of coal in 2018⁶. LCOE measures the total cost of building and operating a facility over its lifetime, and shows renewables beating fossil fuels by ever-larger margins – even without subsidies – with that trend forecast to continue for decades to come.

While many believe renewable energy too expensive and too unreliable to power our grid, new research has overturned that misconception. Plummeting wind, solar, and storage prices have fallen so fast that the United States can reach 90% clean electricity by 2035 – without raising customer costs at all from today's levels and decreasing wholesale power costs 10%.⁷

350 The Report states building a 90% clean electricity system by 2035 would catalyze massive economic growth that helps pull the U.S. out of the [COVID-19 recession](#) by supporting more than a half million new net jobs per year, injecting \$1.7 trillion into the economy, and recharging domestic manufacturing. Technology-neutral

⁴ Nicholas Z. Muller, Robert Mendelsohn, William Nordhaus, Environmental Accounting for Pollution in the United States Economy, AMERICAN ECONOMIC REVIEW, VOL. 101, NO. 5, AUGUST 2011, (pp. 1649-75)

⁵ Bielecki, A., Ernst, S., Skrodzka, W. et al. The externalities of energy production in the context of development of clean energy generation. *Environ Sci Pollut Res* **27**, 11506–11530 (2020).

⁶ <https://www.lazard.com/perspective/lcoe2019>

⁷ 2035 The Report, UC Berkeley's Center for Environmental Public Policy, June 2020, download on June 17, 2020, <https://www.2035report.com/downloads/>

policies can reach a 90% clean power system, help energy developers and investors prosper, and pave the way for technologies of the future.

This rebuilding of a brighter, cleaner, healthy America cannot happen if we continue to subsidize fossil fuels using market failures. RGGI is a policy that simply corrects market failures and allows “honest scales” for a fair and just market.

As we begin the COVID-19 recovery, our health, our future, and our economy cannot afford the failures of the past. Instead, we must move forward together toward a brighter, cleaner, and healthy future. Together we can build a vibrant and healthy Pennsylvania for all.

Blessings,

The Rev. Mitchell C. Hescox
President/C.E.O.