

#3274



Joseph Gusler
President

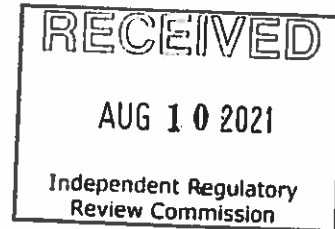
CENTRAL PENNSYLVANIA BUILDING & CONSTRUCTION TRADES COUNCIL

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Rob Bair
Secretary/Treasurer

August 10, 2021

Pennsylvania Independent Regulatory Review Commission
333 Market Street, 14th Floor
Harrisburg, PA 17101



Re: Regulation #7-559: CO2 Budget Trading Program

To Whom It May Concern:

On behalf of the Central Pennsylvania Building & Construction Trades Council, I write to express our strong opposition to Regulation #7-559 (IRRC# 3274): CO2 Budget Trading Program.

This regulation, which lacks statutory authorization and preempts the General Assembly's exclusive power to impose taxes, would force Pennsylvania into the Regional Greenhouse Gas Initiative (RGGI). RGGI would impose massive taxes on current and future fossil fuel electric generation plants, which currently provide two-thirds of Pennsylvania's total generation capacity. The RGGI tax will force many plants to close or otherwise significantly reduce operations, and it will effectively preclude the construction of new natural gas plants. **This is of particular concern to my members who have helped construct several new natural gas plants in recent years and who hope to build even more.**

It is also worth noting that, according to DEP's own modeling, virtually all CO2 emission reductions that would occur as a result of plant closures or reduced generation would be offset by CO2 emission increases in neighboring states, like Ohio and West Virginia. In this sense, RGGI effectively subsidizes coal and natural gas plants in non-RGGI states that, like Pennsylvania, are in the PJM regional transmission organization.

It is impossible to imagine the General Assembly could ever have intended the Air Pollution Control Act to authorize such a massive energy policy overhaul to occur through the regulatory process. If Pennsylvania is to join RGGI, or otherwise impose carbon taxes on fossil fuel generation, this is a decision that should be left to the legislative branch, which is far better equipped to balance the actual risks against the perceived benefits of such a policy.

Central PA Building Trades
Regulation #7-559: CO2 Budget Trading Program
August 10, 2021

We urge IRRC to reject RGGI and, following its rejection, we urge DEP to withdraw the regulation and work with the General Assembly on pro-worker climate change policies that will actually reduce greenhouse gas emissions without jeopardizing our economy.

Regards,

A handwritten signature in black ink that reads "Joseph Gusler". The signature is written in a cursive, slightly slanted style.

JOSEPH GUSLER
President, Central Pennsylvania Building & Construction Trades Council

Cc: Central Pennsylvania House and Senate Members