



July 29, 2021

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

To whom it may concern:

Below are comments by Gregory Wrightstone, Executive Director of the CO2 Coalition concerning the state's participation in RGGI to be presented September 1, 2021:

Pennsylvania's Regional Greenhouse Gas Initiative Relies on Faulty Data: Why RGGI is a "solution in search of a problem"

The administration of Governor Wolf attempts to justify Pennsylvania's participation in RGGI with exaggerated predictions of climatic catastrophes resulting from its similarly exaggerated predictions of carbon dioxide emissions and supposedly damaging atmospheric warming. RGGI, the administration claims without regard to past performance, will reduce emissions while boosting the economy and lowering electric rates.

However, analyses of the Wolf proposal by widely respected professionals show that:

- The administration's predictions of floods, droughts, heat waves, pollution risks, destructive sea-level rise and agricultural damage are contradicted by historical data and what science and common sense suggests for the future.
- The administration overestimates future carbon dioxide emissions and atmospheric warming because more than 99 percent of its climate models are flawed and because its assumptions for coal use likely exceed what is even possible.
- The administration's claims of economic benefits ignore RGGI's poor performance in other states over the past decade. A more realistic forecast for Pennsylvania's proposed participation in RGGI is one of billions of dollars in lost gross domestic product, hundreds of millions in tax losses, tens of thousands in job losses, higher electric bills and no environmental benefits.



In short, the administration's economic and environmental justifications for entering RGGI are invalid and its claims of environmental and economic benefits are fiction. RGGI is a purported solution in search of a problem. Even if there were a problem — which there isn't — RGGI's theoretical effects on the environment would be too small to measure, much less solve it.

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