



**RYAN BOYER**  
President

# Philadelphia Building and Construction Trades Council – AFL-CIO

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**JOHN J. DOUGHERTY**  
Business Manager



**PATRICK J. EIDING**  
Secretary-Treasurer

August 27, 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 Philadelphia Building & Construction Trades Council and its affiliated unions, I write to express our opposition to Regulation #7-559 (IRRC# 3274): CO2 Budget Trading Program (RGGI).

While we agree that human induced climate change is real and intend for our members to play a role in mitigating against its impacts, we do not believe the Regional Greenhouse Gas Initiative (RGGI) to be a serious effort to combat climate change. Indeed, based upon the most recent modeling from the Department of Environmental Protection (DEP), nearly 100 percent of all CO2 emission reductions expected from premature plant closures and reduced operations in Pennsylvania will be offset by increased CO2 and pollutants in states like Ohio and West Virginia. That is a fundamental flaw with the RGGI regulation and the reason why then-Secretary McGinty rejected RGGI membership when the organization was being created.

We are also concerned that RGGI will stifle capital investment in energy and manufacturing projects that our members have worked on in Southeast Pennsylvania. Marcus Hook has the potential to be a major energy hub for the United States and is a major economic engine for the Commonwealth. It is also host to a 790-megawatt natural gas plant, which is capable of powering 800,000 homes, or double the number of residences in the State of Delaware. Based on data from 2019 published by the Energy Information Agency, the Marcus Hook plant would have to pay an additional \$6.5 million annually just to operate at the same level as it did in 2019, which reflects a tax of more than 30 percent per megawatt hour of power it generates.

RGGI will eliminate thousands of current and future jobs, and the alleged job creation promised by DEP will largely be low-paying, non-union jobs. It will trigger significant rate hikes for Pennsylvania ratepayers, which will be particularly harmful to low-income communities and senior citizens living on fixed incomes. It will also fundamentally restructure electric generation in Pennsylvania, as it has in other RGGI states, which now rely on power imported from Pennsylvania as a result of the RGGI tax.

*Vice Presidents*

**JOSEPH ASHDALE**  
JOHN BLAND  
KEVIN BOYLE

**SHAWN DOUGHERTY**  
ROBERT HEENAN  
GARY MASINO

**SHAWN MCCULLOUGH**  
DENNIS PAGLIOTTI  
STEPHEN PETTIT

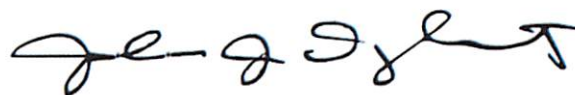
**JIM SNELL**  
JAMES SNYDER  
SAMUEL STATEN, JR.

**MARK WILDSMITH**  
JOSEPH WILLIAMS

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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, appearing to read "John J. Dougherty". The signature is fluid and cursive, with a prominent flourish at the end.

John J. Dougherty  
BUSINESS MANAGER

JJD/kr  
opeiu#32 afl-cio