



Independent Regulatory Review Commission
333 Market Street, 14th Floor
Harrisburg, PA 17601
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**Re: Environmental Quality Board
Regulation No. 7-559: CO2 Budget Trading Program
IRRC Number 3274**

To the Independent Regulatory Review Commission ("IRRC"):

I am writing to urge you to approve Regulation No. 7-559 (the CO2 Budget Trading Program). In the two years since Governor Wolf issued his executive order to develop the regulation, enabling Pennsylvania to join the Regional Greenhouse Gas Initiative ("RGGI"), the prospects of catastrophic climate disruption have become all the more dire, and the causal relationship of fossil fuel burning to the buildup of greenhouse gases in the atmosphere all the more irrefutable.

As a state, Pennsylvania is an outsized contributor to the existential crisis humanity is in -- responsible for roughly 1% of greenhouse gas emissions worldwide. Yet unlike a multitude of US states, including the nine RGGI-participating states in our region, Pennsylvania has yet to adopt any state policy to reduce its carbon pollution. Aggressive measures to reduce carbon pollution and set the course for net zero carbon are needed at all levels of government. And the initiatives underway in many communities in the Commonwealth, and at the federal level, offer promise. But they do not give Pennsylvania a pass. It is imperative that Pennsylvania not delay any further in beginning to cap the climate disrupting pollution of its electric generating units, as a first step.

The public health and economic cases for approval of Regulation #7-559 are as compelling as the environmental ones. The expert testimonies I have read project thousands of lives saved from improved air quality, thousands of clean energy-related jobs created, and the availability of transitional assistance to workers and communities when the remaining coal-fired plants retire. I will just add a couple of points from my personal experience.

First, as an advocate for climate action in my community for over 15 years, I am pleased that our local government took action in 2019 to embrace the goals of achieving 100% clean, renewable electricity by 2035 and clean energy-based heating and cooling and transportation by 2050. The township then funded an energy transition plan that lays out pathways to achieve the goals. There are many steps we can take locally to make progress, but as the plan underscores, state-level actions to limit carbon emissions, and advance clean energy, are essential if communities like mine are to achieve their own emissions reduction targets. Pennsylvania adopting carbon budget trading and joining RGGI tops the list of measures identified as critical. The transition plan anticipates that joining RGGI will lead to some expansion of Pennsylvania-produced clean, renewable electricity, and hence more clean electricity choices for customers here. Of much more significance is the potential for community residents, particularly those with limited incomes, to take advantage of the scaling up of energy efficiency programming with a portion of

the carbon auction proceeds. Harnessing the potential for energy savings, especially in many of the community's older homes, is a key lever in our plan.

Secondly, I am informed by my experience with energy savings efforts in my own home. Over a period of years, I have undertaken a series of measures, including installing and adding insulation, weather sealing, and window replacement. More recently, I converted my water and home heating to all electric systems. As a result, my carbon footprint is greatly reduced, and my electricity bill is low. My utility puts a smiley face on my bill each month. But I am mindful that I undertook all these steps, which have reduced my energy burden, because I could afford them and they were the right thing to do, even though the payback, in most instances, would not be short. I am aware that while my energy burden is in the single digits, many Pennsylvanians with limited means have energy burdens well above 20%. I see it as a hugely missed opportunity that Pennsylvania has forfeited participation in RGGI until now and foregone the millions of dollars in carbon auction proceeds that neighboring states have garnered and used in substantial part to assist low-income customers with energy efficiency measures. I understand that joining RGGI will not fully resolve the energy burden problem in the Commonwealth, but it has great potential to make a difference in many lives.

As a grandmother of small children, I am deeply troubled at how our collective failure to take timely, meaningful action against climate disruption has dimmed their future. I urge you to recognize the moral imperative to approve this regulation, and put Pennsylvania, at long last, in the fight to avert the worst.

Sincerely yours,

Robin Mann
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