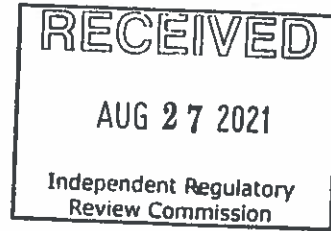


# 3274

Form Letter B 178-179



Jason France  
President  
Over & Under Steel and Rigging  
825 Vilsack Rd  
Glenshaw, PA  
15116  
TEL: 4125135742

August 24th 2021

Independent Regulatory Review Commission  
irrchelp@irrc.state.pa.us  
333 Market St  
14th Floor  
Harrisburg , PA 17101

**Please Reject Regulation #7-559 (IRRC# 3274): CO2 Budget Trading Program (RGGI)**

Dear :

I write to express my opposition to Regulation #7-559 (IRRC# 3274): CO2 Budget Trading Program (RGGI) urge the Independent Regulatory Review Commission to reject this proposal. This regulation is a unilateral attempt to impose a regressive carbon tax on Pennsylvania's consumers and businesses, and is opposed by supermajorities of both the General Assembly and Pennsylvania voters. The impact of the regulation will result in massive job losses, significant utility rate increases, and all for minimal or possibly negative environmental benefit to our commonwealth.

I strongly oppose RGGI for the following reasons:

**MASSIVE JOB LOSSES:**

Organized labor and Pennsylvania's business community are united in their opposition to RGGI because it will lead to the loss of thousands of blue-collar, mostly union jobs, and destroy many communities throughout Pennsylvania. The adoption of RGGI will result in the loss of over 8,000 jobs, the loss of \$2.87 billion in total economic impact, the loss of \$539 million in employee compensation, and the loss of \$34.2 million in state and local taxes. Two-thirds of our electric generation will be rendered uncompetitive, which in turn will lead to increased electric rates in-state and a migration of new generation investment across our borders to states like Ohio and West Virginia which do not participate in RGGI. Energy rates on our manufacturers and other energy-intensive businesses will increase significantly, leading to even more economic devastation, which is why 73 percent of Pennsylvania business owners oppose the Governor's RGGI-by-regulation scheme.

States that have implemented RGGI have seen their electric rates soar and their manufacturing base leave their states. I do not want to see Pennsylvania's overall business competitiveness impacted by an overreaching regulation such as this.

**SIGNIFICANT RATE INCREASES:**

Residential electric ratepayers in Pennsylvania could be forced to pay 18 percent or more for their electric bills, which would be extremely harmful to low-income families and fixed income seniors. As has occurred in current RGGI states, which have seen electric rates increase by more than 1000 percent more than Pennsylvania between 2009 and 2019, RGGI will increase electric bills for residential, commercial, and industrial consumers by \$3 billion by 2030. This is money that cannot be used to grow our economy, pay our workforce, and invest in our communities. As electricity can be the largest cost input for businesses, they will relocate, displacing our jobs and uprooting communities across our commonwealth.



#### PA VOTERS OPPOSE GOVERNOR WOLF'S RGGI TAX REGULATION:

By a margin of 60 percent to 29 percent, Pennsylvania voters oppose, "Governor Wolf taking unilateral action on energy policies that directly impact electric rates and jobs from existing power plants without the approval of the General Assembly." In fact, voters from every region of Pennsylvania feel the same, including: 64 percent in Allegheny County; 56 percent in Southeast Pennsylvania; and, in Philadelphia, 52 percent oppose Governor Wolf's unilateral action on RGGI. And, for good reason as this is an issue that ought to be voted before the legislature as it is a clear tax and as it's a major shift in public policy that will impact the entire commonwealth.

#### NO HELP FOR WORKERS, LOW INCOME FAMILIES AND FIXED INCOME SENIORS:

To make matters worse, adopting RGGI by regulation precludes any assistance to workers, families and communities impacted by job losses and higher electric rates as acknowledged by the Department of Environmental Protection and Penn State University. Many good paying, family sustaining jobs, both union and non-union will be impacted. All those jobs in building and maintaining powerplants will be displaced, but so will the industries that support this economic activity – down to the local restaurants, real estate agents, and local retailers, just to name a few.

#### MORE ENVIRONMENTAL HARM THAN GAIN:

RGGI will have zero impact on climate change. Ninety-nine percent of all CO2 reductions from plant closures in Pennsylvania will be offset by CO2 increases in non-RGGI states, such as Ohio and West Virginia. In fact, those states have been ramping up investments and subsidizing their fossil fuel plants in anticipation of RGGI. Worse yet, those plants are not subject to the same strict air pollution standards as Pennsylvania's plants, which means that increased pollution from Ohio and West Virginia will flow into Pennsylvania as a direct result of RGGI.

Pennsylvania continues to witness the positive environmental impacts that clean, reliable, and affordable energy provides in a deregulated electricity market. Pennsylvania is already ahead of the carbon dioxide emission reduction goals established under Governor Wolf's Climate Action Plan and is ahead of many of the participating RGGI states, even while supplying these same states with energy and energy intensive goods.

I am asking that you intercede on behalf of the citizens of the commonwealth, and on behalf of the impacted communities that have been denied their legal right to confront the bureaucracy that seeks to destroy their lives and livelihoods. Please reject this harmful regulation, lacking basis in Pennsylvania law and in common sense; all for a seemingly political power-play by the Wolf Administration. Thank you for your consideration of this important matter.

Sincerely

Jason France



## Stephen Hoffman

---

**From:** gerald\_bohannon=reyrey.com@campaigns.mplatform.io on behalf of gerald\_bohannon@reyrey.com  
**Sent:** Friday, August 27, 2021 9:01 AM  
**To:** Irrchelp  
**Subject:** Please Reject Regulation #7-559 (IRRC# 3274): CO2 Budget Trading Program (RGGI)

**CAUTION: \*\*EXTERNAL SENDER\*\* This email originated from outside of the organization. Do not click links or open attachments unless you recognize the sender and know the content is safe.**

Jerry Bohannon  
2159 Springhouse Hollow  
Garnet Valley , PA 19078  
TEL: 6102209888  
Independent Regulatory Review Commission  
333 Market St  
14th Floor  
Harrisburg , PA 17101

Please Reject Regulation #7-559 (IRRC# 3274): CO2 Budget Trading Program (RGGI)

Dear :

I write to express my opposition to Regulation #7-559 (IRRC# 3274): CO2 Budget Trading Program (RGGI) urge the Independent Regulatory Review Commission to reject this proposal. This regulation is a unilateral attempt to impose a regressive carbon tax on Pennsylvania's consumers and businesses, and is opposed by supermajorities of both the General Assembly and Pennsylvania voters. The impact of the regulation will result in massive job losses, significant utility rate increases, and all for minimal or possibly negative environmental benefit to our commonwealth. I strongly oppose RGGI for the following reasons: **MASSIVE JOB LOSSES:** Organized labor and Pennsylvania's business community are united in their opposition to RGGI because it will lead to the loss of thousands of blue-collar, mostly union jobs, and destroy many communities throughout Pennsylvania. The adoption of RGGI will result in the loss of over 8,000 jobs, the loss of \$2.87 billion in total economic impact, the loss of \$539 million in employee compensation, and the loss of \$34.2 million in state and local taxes. Two-thirds of our electric generation will be rendered uncompetitive, which in turn will lead to increased electric rates in-state and a migration of new generation investment across our borders to states like Ohio and West Virginia which do not participate in RGGI. Energy rates on our manufacturers and other energy-intensive businesses will increase significantly, leading to even more economic devastation, which is why 73 percent of Pennsylvania business owners oppose the Governor's RGGI-by-regulation scheme. States that have implemented RGGI have seen their electric rates soar and their manufacturing base leave their states. I do not want to see Pennsylvania's overall business competitiveness impacted by an overreaching regulation such as this. **SIGNIFICANT RATE INCREASES:** Residential electric ratepayers in Pennsylvania could be forced to pay 18 percent or more for their electric bills, which would be extremely harmful to low-income families and fixed income seniors. As has occurred in current RGGI states, which have seen electric rates increase by more than 1000 percent more than Pennsylvania between 2009 and 2019, RGGI will increase electric bills for residential, commercial, and industrial consumers by \$3 billion by 2030. This is money that cannot be used to grow our economy, pay our workforce, and invest in our communities. As electricity can be the largest cost input for businesses, they will relocate, displacing our jobs and uprooting communities across our commonwealth. **PA VOTERS OPPOSE GOVERNOR WOLF'S RGGI TAX REGULATION:** By a margin of 60 percent to 29 percent, Pennsylvania voters oppose, "Governor Wolf taking unilateral action on energy policies that directly impact electric rates and jobs from existing power plants without the approval of the General Assembly." In fact, voters from every region of Pennsylvania feel the same, including: 64 percent in Allegheny County; 56 percent in Southeast Pennsylvania; and, in Philadelphia, 52 percent oppose Governor Wolf's unilateral action on RGGI. And, for good reason as this is an issue that ought to be voted before the legislature as it is a clear tax and as it's a major shift in public policy that will impact the entire commonwealth. **NO HELP FOR WORKERS, LOW INCOME FAMILIES AND FIXED INCOME SENIORS:** To make matters worse, adopting RGGI by regulation precludes any assistance to workers, families and communities impacted by job losses and higher electric rates as acknowledged by the Department of Environmental Protection and Penn State University. Many good paying, family sustaining jobs, both union and non-union will be impacted. All those jobs in building and maintaining powerplants will be displaced, but so

will the industries that support this economic activity – down to the local restaurants, real estate agents, and local retailers, just to name a few. MORE ENVIRONMENTAL HARM THAN GAIN: RGGI will have zero impact on climate change. Ninety-nine percent of all CO2 reductions from plant closures in Pennsylvania will be offset by CO2 increases in non-RGGI states, such as Ohio and West Virginia. In fact, those states have been ramping up investments and subsidizing their fossil fuel plants in anticipation of RGGI. Worse yet, those plants are not subject to the same strict air pollution standards as Pennsylvania's plants, which means that increased pollution from Ohio and West Virginia will flow into Pennsylvania as a direct result of RGGI. Pennsylvania continues to witness the positive environmental impacts that clean, reliable, and affordable energy provides in a deregulated electricity market. Pennsylvania is already ahead of the carbon dioxide emission reduction goals established under Governor Wolf's Climate Action Plan and is ahead of many of the participating RGGI states, even while supplying these same states with energy and energy intensive goods. I am asking that you intercede on behalf of the citizens of the commonwealth, and on behalf of the impacted communities that have been denied their legal right to confront the bureaucracy that seeks to destroy their lives and livelihoods. Please reject this harmful regulation, lacking basis in Pennsylvania law and in common sense, all for a seemingly political power-play by the Wolf Administration. Thank you for your consideration of this important matter.

Sincerely,  
Jerry Bohannon