



RIVER MATERIALS INC.

**PO BOX 366
MCKEESPORT, PA 15134**

Dear Commissioners:

As the largest intermodal river terminal on the Upper Ohio river system, we are proud to be a part of Western Pennsylvania and the main supplier of thermal coal to Keystone power plant in Armstrong County and Conemaugh power plant in Indiana County.

I write to express our opposition to Regulation #7-559 (IRRC# 3274): CO2 Budget Trading Program and urge the independent Regulatory Review Commission to reject this proposed final regulation. This regulation is a unilateral attempt to join Pennsylvania to the Regional Greenhouse Gas Initiative (RGGI) and impose a carbon tax on Pennsylvania's consumers and businesses. The impact of this proposed final regulation will result in job losses and utility rate increases in entire regions of our state, most in Western Pennsylvania that are the heart of Pennsylvania's bituminous coal industry, and all for no environmental benefit to our commonwealth.

The proposed regulation would dramatically alter Pennsylvania's energy generation portfolio by causing the near immediate closure of the state's remaining coal-fired power plants. These closures will result in the loss of thousands of jobs supplying and supporting those power plants, a crippling reduction of property and income taxes in communities that host the power plants, and higher electric rates regressively impacting the poorest in our communities.

The thermal coal market represents the largest market by far for Pennsylvania-mined coal. The Commonwealths coal fired EGU's are a significant end use consumer. In 2019, over 36% of Pennsylvania coal distributed to the electric power sector was consumed in the state by coal fired EGU's. The proposed CO2 Budget Trading Program regulation will result in dire economic consequences at the local and regional levels throughout Pennsylvania.

The economic devastation resulting from the closure of these plants will not lead to a significant reduction in carbon dioxide emissions. 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** where plants are currently subsidized.

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 right to confront the bureaucracy that seeks to destroy their lives and livelihoods. Please reject this harmful regulation.

Thank you for your consideration of my comments.

Sincerely,

A handwritten signature in blue ink, appearing to read "Clifford C. Wise". The signature is fluid and cursive.

Clifford C. Wise
CEO, River Materials Inc.