Testimony of Robin Mann  
Pennsylvania Implementation of Clean Power Plan  
Thursday, September 25, 2014  
Pennsylvania Department of Environmental Protection Hearing

Thank you for opportunity to speak today. I appreciate that DEP is accepting input at this juncture on the EPA's proposed Clean Power Plan. Given the profound urgency, I personally support EPA's stepping up to put forward the proposed Clean Power Plan, and as a Sierra Club volunteer I support our recommendations for making the plan even stronger, and ensuring that safeguards are added to prevent increased emissions, or "hotspots," in some communities in the implementation process. As has been noted and will be detailed by other speakers, Pennsylvania has been and is a disproportionately large contributor of the greenhouse gas emissions that are disrupting the climate and threatening the future livability of the planet. Pennsylvania has a commensurately major role to play in contributing to the solution, but there are significant opportunities as well as challenges presented by meeting our obligations under the Clean Power Plan.

I will focus my remarks on Pennsylvania's design of its implementation of the Plan.

Given the major directional influence this planning process will have on Pennsylvania's energy economy, it is very important for DEP to hear from citizens and communities not represented here today. Communities and people most impacted by our current fossil fuel-dependent economy -- through pollution and health impacts, and economic dependence -- and disadvantaged communities that could benefit most from targeted investment in building the clean energy economy need to be afforded the opportunity, early on, to shape the plan. I urge DEP to go where those communities and citizens are and hear from them. Regional hearings at this early stage could help accomplish that purpose.

**Future Pennsylvania citizens can't afford our failure to act**

Even with aggressive, collective action to curb carbon emissions, we are already likely facing a rise of 2 degrees Celsius in global average temperatures, posing threats and challenges to health and safety, and Pennsylvania's economy, most especially the agricultural sector. Failure to curb emissions and allowing global average temperatures to rise by 3 degrees would invite more, costly catastrophic events and health impacts, and reduce annual economic productivity nearly 1%, translating to $6 billion per year for Pennsylvania.¹

¹ The Cost of Delaying Action to Stem Climate Change, July 2104:  
http://www.whitehouse.gov/sites/default/files/docs/the_cost_of_delaying_action_to_stem_climate_change.pdf
Pennsylvania can and should meet its obligation by building on its clean energy progress to date

The draft Clean Power Plan calls for Pennsylvania to achieve a 31% reduction in the carbon pollution intensity of electricity or 479lbs/MWh by 2030. Already, half of that reduction can be achieved by scheduled coal plant retirements and maintaining the existing Act 129 energy efficiency requirements for utilities and the targeted 8% clean power in Tier 1 of the Alternative Energy Portfolio Standard. But Pennsylvania, which was once a national leader on clean energy, now significantly lags behind neighboring states. If we were to bring our clean renewable energy target to 20% by 2030 and double the very modest Act 129 target of reduction in electricity consumption to 1.5%/yr. -- more or less even with other states in the region -- Pennsylvania's Clean Power Plan goals would be nearly met. And that is without taking the very reasonable step, thus far rejected, of upgrading our building code to current energy efficiency standards.

Why should Pennsylvania rely on energy efficiency and clean, renewable energy to meet its Clean Power Plan target?

Quite simply, well-designed, it is the best approach economically and it puts people first. Boosting renewable sources of electricity and demand reduction reduce electricity prices, and vulnerability to fuel price swings for everyone, especially those for whom the household energy cost burden is greatest. Investing in clean renewables and energy efficiency boosts the economy through comparatively greater job creation and larger, more distributed tax revenues. And contrary to industry claims, the evidence shows that significant investment in renewable energy and efficiency increases reliability.2

The alternative of relying on shifting from one fossil fuel to another -- from coal to natural gas fired electricity -- cannot be expected to achieve the necessary greenhouse gas emissions reduction, given the methane releases associated with production, and will not achieve, but rather undercut, the above objectives.

Pennsylvania must shape its energy future around the needs of energy consumers, workers and communities, investing in a just and equitable transition for those impacted by reduced reliance on fossil fuels.

I want to quote Sierra Club's Pennsylvania organizing representative Tom Schuster's recent testimony on this point:

\[2\] PJM, the operator of the regional grid, has concluded that we can get at least 30% of our energy from wind and solar by 2026 with no reliability problems, minimal changes to the transmission infrastructure, and net savings on wholesale energy prices. [http://pjm.com/-/media/committees-groups/task-forces/irff/postings/pris-executive-summary.ashx](http://pjm.com/-/media/committees-groups/task-forces/irff/postings/pris-executive-summary.ashx)
"We also recognize that even though the transition to cleaner forms of energy will be a net benefit to the Commonwealth, there are some coal-dependent communities that will be disproportionately impacted by this transition. We support an effort by leaders at the federal, state, and local levels to work to understand the needs of these communities and their workers, and to develop fully funded programs to aid in the transition. We cannot afford to postpone the transition, but we cannot put all the impacts on the shoulders of a few."³

In closing, I want to reiterate my opening point. People in frontline communities need to play a significant voice in the designing Pennsylvania's Clean Power Plan. As a Sierra Club volunteer, I work closely with leaders of an environmental coalition in the Environmental Justice community of Eastwick in Southwest Philadelphia. Not only is the community burdened disproportionately by legacy and ongoing pollution and chronic flooding, it is also the most vulnerable of Philadelphia's neighborhoods to sea-level rise and storm surge. At the same time, there is a high incidence of poverty and joblessness. Residents of that community and other similar ones can best inform the design of an approach that confronts the urgency for aggressive carbon pollution reduction in an economically just and forward-looking way.

³ Senate Environmental Resources and Energy Committee Hearing testimony regarding: EPA's Proposed Clean Power Plan, 8/21/2014