



PennFuture is a statewide public interest membership organization founded in 1998, with offices across the state. Our Energy Center focuses on helping the transition to a clean energy economy.

We are pleased that DEP is holding this listening session today. And we applaud EPA's announced intention to propose a standard in 2014 to limit industrial carbon pollution from existing power plants. Although some are wary of this, EPA's CO2 standard need not be as disruptive as some contend.

For example, a recent report* from the World Resource Institute (WRI) indicates that Pennsylvania can make great strides towards meeting the reductions we expect EPA to propose in the rule. WRI outlines five existing policies or increases in activities already under way.

Pennsylvania can reduce power sector CO2 emissions by at least 21 percent below 2011 levels by 2020 by using existing or slightly modified policies, such as:

1. Meeting Act 129's energy efficiency requirement on electric utilities (11 percent reduction from 2011);
2. Meeting all of the Tier I Alternative Energy Portfolio Standard's 8 percent renewable energy requirement with in-state resources (4 percent reduction from 2011);
3. Increasing the use of combined heat and power (CHP) at commercial and industrial facilities by 26 percent (3 percent reduction from 2011);
4. Increasing the use of existing, high efficiency natural gas plants (3 percent reduction); and
5. Improving the efficiency of existing coal plants (2 percent reduction).

Once the rule on existing power plants has been formally proposed, PennFuture looks forward to working with the Department and many other voices in Pennsylvania to develop our state implementation plan to determine how the standards will be met here.

PennFuture is especially interested in employing strategies that will help keep electricity prices stable. For example, improving power plant efficiency will likely cost less than changing fuel sources at plants.

We do know that overall costs to society will drop with cleaner fuel sources, due to all the public health problems and associated costs, like lost productivity, that will be avoided as a result in years to come.

As the third largest emitter of global warming pollution, it's clear that Pennsylvania needs to take seriously the charge to reduce emissions from existing sources.

Thank you.

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* Power Sector Opportunities for Reducing Carbon Dioxide Emissions: Pennsylvania, October 2013, www.wri.org/publication/power-sector-opportunities-reducing-carbon-dioxide-emissions-pennsylvania