



August 8th, 2023

Via Electronic Transmission

U.S. Environmental Protection Agency
EPA Docket Center, ID No. EPA-HQ-OAR-2023-0072
Mail Code 28221T
1200 Pennsylvania Avenue, NW
Washington, DC 20460
a-and-r-docket@epa.gov

Attention: Docket ID No. EPA-HQ-OAR-2023-0072

Re: New Source Performance Standards for Greenhouse Gas Emissions from New, Modified, and Reconstructed Fossil Fuel-Fired Electric Generating Units; Emission Guidelines for Greenhouse Gas Emissions from Existing Fossil Fuel-Fired Electric Generating Units; and Repeal of the Affordable Clean Energy Rule

Dear Administrator Regan,

The Pennsylvania Department of Environmental Protection (DEP, Department) appreciates the opportunity to provide comments on The United States Environmental Protection Agency's (EPA) proposed new rule on the New Source Performance Standards for Greenhouse Gas Emissions from New, Modified, and Reconstructed Fossil Fuel-Fired Electric Generating Units; Emission Guidelines for Greenhouse Gas Emissions from Existing Fossil Fuel-Fired Electric Generating Units; and Repeal of the Affordable Clean Energy Rule.

The proposed new rule represents historic federal action to reduce CO₂ emissions from fossil-fuel power plants based on cost-effective and available control technologies. The new proposed rule would eliminate 617 million metric tons of CO₂ through 2042 along with tens of thousands of tons of PM_{2.5}, SO₂ and NO_x. The quantified climate benefits include the value of multiple climate change impacts, including (but not limited to) changes in net agricultural productivity, human health effects, property damage from increased flood risk natural disasters, disruption of energy systems, risk of conflict, environmental migration, and the value of ecosystem services. Furthermore, the health benefits of the proposals include approximately 1,300 avoided premature deaths; more than 800 avoided hospital emergency room visits; approximately 2,000 avoided cases of asthma onset; more than 300,000 avoided cases of asthma symptoms; 38,000 avoided school absence days; and 66,000 lost workdays.

The proposed new rules are vital to curbing the impacts of climate change. In Pennsylvania, our climate has undergone a long-term warming of more than 1° C (1.8° F) over the past 110 years. Pennsylvania's climate has also become wetter, with a 10 percent increase in the amount of precipitation, on average. Pennsylvanians can expect to see an additional 8 percent increase in precipitation by 2050. Human activities related to greenhouse gas emissions have been linked to disruption in the global climate. Furthermore, lower unit fossil fuel-fired power plants and peaker plants are more predominantly located

Secretary

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in Environmental Justice communities. Pennsylvanians who live in Environmental Justice communities in particular are disproportionately exposed to climate hazards, such as flooding and heatwaves. At the same time, they have limited access to tools to adapt to impacts and transition to cleaner energy to slow down climate change. As the climate continues to heat up, this vulnerability will deepen, unless action is taken.

DEP appreciates the opportunity to provide comments on EPA's new proposed rule on the New Source Performance Standards for Greenhouse Gas Emissions from New, Modified, and Reconstructed Fossil Fuel-Fired Electric Generating Units; Emission Guidelines for Greenhouse Gas Emissions from Existing Fossil Fuel-Fired Electric Generating Units; and Repeal of the Affordable Clean Energy Rule. Should you have questions or need additional information, please contact Lena Smith, Policy Advisor, by e-mail at madelsmith@pa.gov.

Sincerely,


Richard Negrin
Secretary