



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 the Pennsylvania Department of Environmental Protection (DEP) is holding this listening session today. We fully support EPA's proposed standard (the Clean Power Plant Rule) to limit CO2 emissions from existing power plants, urging the standard to be adopted quickly and without any weakening.

We are, however, dismayed that DEP seems not to be taking seriously the Commonwealth's responsibility to meet the standard, despite EPA's proposal offering abundant flexibility to each state in the methods it chooses to meet the reduction targets for the state.

We're deeply disheartened that the Commonwealth publicly acknowledges that they know their proposal to the EPA will be rejected. We simply don't see how this approach is useful to the citizens of this state.

And frankly, with Governor Corbett stating as recently as four months ago¹ that that he believes there is still significant debate in the scientific community about the existence and risks of human-made climate change, it's not surprising that his administration is offering an inadequate response to the EPA. Deeply disheartening, but not surprising.

We are concerned that the Governor and his Administration do not think that cost-saving energy efficiency at homes and businesses should be considered in formulating our goals. The Pennsylvania Public Utility Commission found² that for every \$1 spent on efficiency in Pennsylvania, ratepayers receive \$3 back in benefits.

PJM, the operator of the electricity grid that serves Pennsylvania, found that the grid can increase renewable energy to twenty-to-thirty percent of electricity supply while reducing wholesale electricity prices by \$9-to-\$20 billion³, all while maintaining a reliable grid. However, we are troubled that the Governor and DEP do not want renewable energy to be considered when setting targets.

We question why DEP intends to respond to EPA with a state plan that does not represent a good faith effort to comply with the proposed rule, will undervalue the need to reduce carbon pollution, and will discount our public health and the economic benefits of addressing climate change.

We urge DEP to evaluate carefully the protests from the coal industry about the standard, protests which frankly can seem a bit disingenuous. A number of coal plant operators have, in fact, retired uneconomical coal plants since 2012 or have announced plans to retire such plants the next couple of years. Current data shows this will result in a drop of about 17 percent of the

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¹ "Corbett: climate change is 'a subject of debate'," State Impact, May 13, 2014

² Act 129 Statewide Evaluator's Final Annual Report, Phase I: June 1, 2009 – May 31, 2013

³ PJM Renewable Integration Study, Project Review Revision 07, October 28, 2013

2012 baseline capacity. These retirements were all announced before the EPA proposed the standard, so it would be a stretch of the imagination to claim these closures were caused by the Clean Power Plant Rule.

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 and property damage, that would be avoided as a result in years to come *if* we enact this standard now.

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.

Globally, we've now had 354 consecutive months above the long-term average, meaning a 29-year-old has never lived through a "cooler than normal" month. It is so clearly past time that the Commonwealth of Pennsylvania take seriously the challenges of climate change to current and future generations.

Please do know that PennFuture is eager to work with DEP on formulating the state's plan. We are especially interested in employing strategies that will help keep electricity prices stable.

Thank you for allowing PennFuture to testify.

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We must also reduce methane leakage from traditional and fracked natural gas development if we are to make real progress on slowing climate change.

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