



"Connection for Oil, Gas & Environment in the Northern Tier, Inc."

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**COMMENT OF
CONNECTION FOR OIL, GAS & ENVIRONMENT IN THE NORTHERN TIER, INC.
(C.O.G.E.N.T.)**

**Presented By:
Emily E. Kraffack, President**

**TO
THE PENNSYLVANIA DEPARTMENT OF ENVIRONMENTAL PROTECTION**

**LISTENING SESSION
ON THE CLEAN AIR ACT SECTION 111(d)**

**DECEMBER 9, 2013
RACHEL CARSON STATE OFFICE BUILDING
HARRISBURG, PA**

Good afternoon, Deputy Secretary Brisini and DEP staff. Thank you for inviting me to speak today on the important subject of the Clean Air Act's Section 111(d). My name is Emily Krajack, and I'm providing comments today in my purely voluntary, uncompensated role as President of Connection for Oil, Gas and Environment in the Northern Tier, Inc. C.O.G.E.N.T focuses on the five county region of Bradford, Sullivan, Susquehanna, Tioga and Wyoming Counties. C.O.G.E.N.T. is a resource for landowners and communities alike striving to find and advocate for a balance that supports public health and safety, community and the environment with the needs of industry. There are approximately 183,000 souls in the five county 3,987 square mile region. Many of us and our families now live near unconventional gas well sites and facilities, having them located within and around our rural, farmland and forested communities. We also have unconventional gas well sites and facilities located near our children's schools. Because of these facts, we take a keen interest in promoting adequate protection of our Northern Tier Region's air resources.

The Northern Tier Region hosts no coal fired electric generating units. However, due to the fact that our air quality is dramatically changing (and not to the betterment) and our school age asthma rates are beginning to indicate an upward trend as a result of the natural gas exploration and production activity, we do have an interest of how existing electric generating units will be regulated under the Clean Air Act Section 111(d). As we know, as sure as the wind blows these power plants produce a large amount of emissions including greenhouse gases which are eventually dispersed throughout our Commonwealth.

It is my understanding that the purpose of today's listening session is to put forth relevant ideas that will help our existing electric generating units to remain in operation, while at the same time, reducing emissions. Several ideas I would like to put forth at this time.

- Conservation - customers receiving their electricity from such coal fired plants, need to conserve energy and thus reduce harmful emissions. This can be done a number of ways, some already in effect starting with incentives to upgrade

appliances and home improvements. Customers need to have an understanding that conservation can make a big difference with air quality and our economy. However, unfortunate as it may be, how much conservation can effect emissions may not be enough. There is always some new electronic device that is being plugged in at home. Hybrid electric vehicles may increase the draw of electricity as an estimated increase of 25-40%. [Switch, documentary] Even myself as conscious as I am about energy usage, I know I am consuming too much electricity, and my electricity partly originates at a coal fired electric plant.

- Solar & Wind – The Commonwealth can do much to mandate rules to assist electric consumers having incentives with alternative energy. We already have a good rebate program in place. Some of these requirements would involve creating a smoother transition to solar once local inspections are completed along with a method to advise home owner of AEPS as they would want to participate. We need to increase the demand of AEC by coal plants in order to more effectively reduce emissions.
 - These suggestions are based on my family's experience with transitioning to a small residential solar panel system on our home this year. Our system may offset 50% of our electric generation needs. We wanted to make an investment in being part of a cleaner air solution and invest in the future by reducing our monthly electric bill. We ran into problems. While there were rebate opportunities offered by both the state and federal governments, the discouraging part was that our electric company was not as cooperative as they could be in the process of reducing our reliance on the grid. Our contractor advised us that they never dealt with this electric company before and they were amazed at how uncooperative they were. To give you an idea, our system was live, ready to generate electricity on September 27th, but our electric company never gave us the permission to flip the solar switch until October 7th and that was only because of repeated contact on our part. Our contractor advised us that other electric companies provide for immediate connection once all the inspections are complete. In addition, the electric company was not prompt on providing the rebate paperwork, so I had to

contact them in order to obtain that information. This is something that needs to be mandated to work better. We actually thought they'd be thanking us since they are closing so many coal fired plants and could sell the kilowatts to another customer. Additionally, our contractor failed to provide us with information regarding AEPS, and if I hadn't accidentally stumbled across the website in December I would not have known about it.

- Dual Fuels – existing plants need to investigate using dual fuels either in modification or the building of an additional unit that would burn natural gas. This provides some flexibility and offsets greater emissions at the source. The benefit of having overhead transmission line infrastructure is also realized. Modifications must not decrease plant efficiency. There are a number of options available when consideration is given to siting small companion natural gas facilities on coal fired electric power plant sites that will aid in reducing emissions at the source.
 - As an example, I mention the Montour Power Plant - Some operators have made considerable investment to reduce SO₂ emissions substantially. If we are serious about burning coal to make electricity, then similar measures must be taken in order to adequately protect our air resources. From what I could discover by comparing power plant emissions, a natural gas fired power plant has about 33% of the emissions of a similar sized coal fired power plant. Thus, might dual fuel options be a short term solution to maintaining the operation of an existing coal fired plant? It is worth to consider a smaller natural gas electric generating facility onsite to offset the coal fired plants emission's, taking advantage of existing overhead transmission line infrastructure. Dual fuel plant modifications are worth consideration providing that the generation is at least as efficient as pre-modification operations.
- The need to achieve a balance with the coal industry – Some folks may advocate stopping mining and burning coal. We are not advocating as such for a number of

reasons. If we don't burn coal, more coal will be sold to countries that perhaps do not require emission reduction technologies, or to the extent we do in our Commonwealth or the United States. Looking globally, that is a concern. Also, Pennsylvania has mined coal for over 200 years; it has been part of our rich heritage, for the good and the not so good. Currently, in 2012 the average wage of a Pennsylvania Coal Miner was in excess of \$79,000 according to the National Mining Association. http://www.nma.org/pdf/c_wages_state_industries.pdf If we take a look at the May/June 2012 Issue of the UMW Coal Miners Journal, we find surprisingly, that the average age of coal miners has dramatically fallen to many of these miners being in their 30's. If we are going to transition off of coal, we need to have job training in place for relevant industries that will provide family wages and benefits these workers are accustomed to. These jobs can be in the energy industry, natural gas, solar and wind. These are folks who aren't afraid of hard work. Wages and the multiplier effect within the coal industry trickles down throughout their communities just as the natural gas industry has done in the Northern Tier Region. Our region knows first-hand what it is to have few economic opportunities. Trading one region or one energy form against the next is not the way to go in an immediate manner.

Thus, what we advocate for is taking all these pieces of the puzzle and considering them in a fashion where the ultimate compromise is made. It will be a compromise where everyone is hurting a little bit, but in the end all benefit. This process, which can be viewed as a slow moving target that can be hit, needs to be established in such a manner that there is a regularly established five year review on where we are and where we are going. There needs to be a way to measure falling emissions, balanced with the use of coal within our Commonwealth and our state's economy.

Thank you.