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Attorneys for Petitioner

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PATRICK J. McDONNELL, SECRETARY :	COMMONWEALTH COURT
OF THE DEPARTMENT OF :	OF PENNSYLVANIA
ENVIRONMENTAL PROTECTION :	
and CHAIRPERSON OF THE :	ORIGINAL JURISDICTION
ENVIRONMENTAL QUALITY :	
BOARD, :	No. __ MD 2022
	:
Petitioner, :	
	:
v. :	
	:
PENNSYLVANIA LEGISLATIVE :	
REFERENCE BUREAU, VINCENT C. :	
DeLIBERATO, JR., DIRECTOR OF THE :	
LEGISLATIVE REFERENCE BUREAU, :	
and AMY J. MENDELSON, DIRECTOR :	
OF THE PENNSYLVANIA CODE and :	
BULLETIN, :	
	:
Respondents. :	

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**DECLARATION OF ALLEN LANDIS**

1. I work at the Department of Environmental Protection in the Energy Programs Office.

2. My work in the Energy Programs Office has extensively involved, among other things, the development of the Trading Program Regulation.

3. As a result of Respondents' refusal to publish the Trading Program Regulation in the *Pennsylvania Bulletin*, Pennsylvania's entry into the Regional Greenhouse Gas Initiative ("RGGI") has already been delayed from January 1, 2022 to April 1, 2022.

4. As a result of this delay, Pennsylvania has been unable to participate in the first auction, and has already lost approximately \$162 million in proceeds and associated air pollution reductions.

5. If Pennsylvania cannot join RGGI until July 1, 2022, I estimate that Pennsylvania will lose approximately \$283 million in proceeds and associated air pollution reductions.

I declare under penalty of perjury that the foregoing is true and correct to the best of my knowledge, information and belief.

Dated: February 3, 2022

*Allen Landis*  
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Allen Landis