

Comments for the Citizen's Advisory Council

Rachel Carson Building, Harrisburg PA

April 21, 2015

I thank the Citizen's Advisory Council for this opportunity to comment on the Clean Power Plan and the Chapter 78 Regulations.

I am a homeowner who in July 2013 used the Electric Choice Program to choose a provider of 100% renewable energy sourced in Pennsylvania. I made this choice in part to lessen my contribution to the climate crisis.

I understand that Pennsylvania is faced with similar but much more complex and impactful choices in its response to the EPA's Clean Power Plan (CPP)

The CPP is an important opportunity for Pennsylvania to prioritize renewable energy and energy efficiency to provide safe, reliable, and clean power.

When I tout the advantages of renewable energy, I often get a rebuttal to the effect that the sun doesn't shine and the wind doesn't blow enough in Pennsylvania to make them viable sources of for electric generation. Yet a Union of Concerned Scientist analysis found that Pennsylvania could increase its electricity sales from renewable sources of just 4% in 2013 to 19% by 2030 if it would commit to grow renewable energy at the same rate that other states have already demonstrated is achievable and affordable. Pennsylvania's current Alternative Energy Portfolio Standard requiring only 8.5% renewable electricity by 2020 must be strengthened to put Pennsylvania on a sure path for achieving the maximum emission reductions possible by using these zero-emission energy sources.

Likewise the state's Energy Efficiency Resource Standard also needs strengthening to achieve the maximum improvement in energy efficiency possible.

I urge the Wolf Administration to follow through on candidate Wolf's exploration of Pennsylvania joining the Regional Greenhouse Gas Initiative (RGGI), a nine-state partnership of northeastern states that established a market-based mechanism for reducing carbon emissions. The Union of Concerned Scientist posits that multi-state cooperation is the most cost-effective way of cutting emissions and meeting the EA's carbon reductions.

I don't claim to be an expert on the Initiative, but I understand that joining the RGGI would generate revenue for the state. The RGGI states have used auction revenue generated by the program to invest in energy efficiency programs, assistance to low-income communities and renewable energy development. For Pennsylvania, auction revenue could be used in part for workforce development in coal communities that have been hit by the shift away from coal.

I urge the Wolf Administration to consider that substituting fracked gas for coal as Pennsylvania's dominant fuel source may not actually achieve the emission reduction targets set forth in the CPP. While natural gas when burned has fewer carbon emissions than burning coal, the life cycle of fracked gas production involves methane leaks which can be far more potent than carbon dioxide in heating the atmosphere. Will the shale gas industry voluntarily adopt the costly measures needed to control methane emissions? Does the PA DEP have the regulations and the resources to control methane emissions? An analysis by the Institute for Energy and Environmental Research of methane emissions calls into question fracked gas-fired electric generation as a Best System of Emission Reduction.

Living in southwestern Pennsylvania, I am painfully aware of other reasons why Pennsylvania should not become overly reliant on fracked gas to power electric generation. The production of this fuel demands unjust sacrifices of those living in its wake. I know people who have had their health, their livelihoods and their properties compromised by nearby shale gas wells and other infrastructure, and the long term impacts on public health such as increased cancer rates are only beginning to become apparent.

Going back to my choice of 100% renewable electric, it will not surprise you that an important consideration was my desire not to encourage fracked gas development and the unjust sacrifices it requires. If it were up to me, I would leave it in the ground.

I know that's not feasible. Still I ask that Pennsylvania craft a response to the Clean Power Plan that will leave the maximum possible amount of fossil fuel in the ground. And I realize it's a tall order to ask our elected officials to resist the siren song of the Marcellus Shale.

If we must endure development of this resource, I call on the DEP to enact the strongest possible regulation regardless of the cost to the industry--particularly the Chapter 78 regulations now under revision: closed loop storage of flow back fluid, scrubbers to prevent air pollution, green completion, and many others.

I call on the PA General Assembly to appropriate sufficient funds for the DEP to enforce those regulations and on the Wolf Administration to place no restrictions on the DEP's ability to impose penalties that will ensure full compliance.

This is the least we can do to honor the sacrifice of those harmed.

Respectfully submitted,

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