



Industrial Energy Consumers of Pennsylvania

November 20 , 2019

Department of Environmental Protection
Secretary Patrick McDonnell
Rachel Carson State Office Building
400 Market Street
Harrisburg, PA 17101

Re. Executive Order – 2019-07- Commonwealth Leadership in Addressing Climate Change through Electric Sector Emissions Reductions

Dear Secretary McDonnell,

On behalf of the Industrial Energy Consumers of Pennsylvania (IECPA) and its member companies representing over 25,000 employees statewide, we are writing today regarding Executive Order – 2019-07- Commonwealth Leadership in Addressing Climate Change through Electric Sector Emissions Reductions. As you are aware on October 3rd of this year, Governor Wolf issued Executive Order number 20019-07. That rulemaking ordered and directed the DEP to:

1. Rulemaking. By no later than July 31, 2020, develop and present to the Pennsylvania Environmental Quality Board a proposed rulemaking package to abate, control, or limit carbon dioxide emissions from fossil-fuel-fired electric power generators, which rulemaking package shall be authorized by the Act of January 8, 1960 (1959 P.L. 2119, No. 787), known as the Air Pollution Control Act. The proposed rulemaking shall:
 - a. Include a robust public outreach effort working with the business community, energy producers, energy suppliers, organized labor, environmental groups, and others to ensure that the development and implementation of this program results in reduced emissions, economic gains, and consumer savings;
 - b. Establish a carbon dioxide budget consistent in stringency to that established in the RGGI participating states;
 - c. Provide for the annual or more frequent auction of carbon dioxide emissions allowances through a market-based mechanism; and
 - d. Be sufficiently consistent with the RGGI Model Rule such that allowances may be traded with holders of allowances from other states.
 - e. Interaction with Regional Transmission Organization. The DEP, working with the Public Utility Commission, shall engage with PJM Interconnection to promote the integration of this program in a manner that preserves orderly and competitive economic dispatch within PJM and minimizes emissions leakage.

The Voice of Large Energy Consumers In Pennsylvania

Rod Williamson, Executive Director

rwilliamson@clarkhill.com

910-444-8883



Industrial Energy Consumers of Pennsylvania

IECPA membership is familiar with the RGGI Initiative and operate in states that have adopted and implemented the program. Our issue is not with the underlying goals of reducing carbon emissions, *but rather the unnecessary RGGI cost that would be imposed on electric generators in Pennsylvania that will increase the cost of electricity to Pennsylvania residents, commercial businesses and large energy intensive, trade exposed industrial manufacturers.*

As you work to comply with this executive order, we ask that you please consider the following:

The cost of the RGGI program in Pennsylvania would not be comparable to any of the other states in the RGGI program.

Table 4. 2016 State energy-related carbon dioxide emissions by sector

Million metric tons of carbon dioxide

State	Commercial	Electric Power	Residential	Industrial	Transportation	Total
Connecticut	3.9	7.0	6.3	1.9	15.3	34.3
Delaware	0.9	3.6	0.8	3.4	4.6	13.3
Maine	1.6	1.5	2.9	1.5	8.9	16.5
Maryland	5.2	17.2	5.5	2.2	27.6	57.6
Massachusetts	7.0	10.7	11.4	3.4	31.7	64.2
New Hampshire	1.4	2.4	2.5	0.8	6.7	13.8
New York	21.7	27.7	30.6	8.3	75.4	163.7
Pennsylvania	10.7	82.1	18.4	45.6	60.7	217.4
Rhode Island	0.9	2.6	1.8	0.6	3.9	9.8
Vermont	0.9	0.0	1.3	0.4	3.4	6.0

Source: Energy Information Administration (EIA)

Pennsylvania is an energy producing state and would be penalized for that energy production. Looking at the annual amount of RGGI auction revenues collected in each participating state spread over the Electric Power sector CO₂ emissions in those states results in \$3.35 per metric ton. When applied to 82.1 metric tons of Electric Power sector CO₂ emissions in Pennsylvania, the minimal financial impact of RGGI on PA is approx. \$275 million per year additional cost to electric generators. However, this does not consider additional secondary market CO₂ allowances that generators may need to purchase or the increased cost to electric generators to reduce CO₂ emissions to comply with RGGI.

The RGGI cost imposed on electric generators in Pennsylvania will increase the cost of electricity to Pennsylvania residents, commercial businesses and large energy intensive, trade exposed industrial manufacturers. For these large industrial manufacturers, this places them at a competitive disadvantage to facilities in others states and countries that do not incur the cost of a RGGI like program.

The Voice of Large Energy Consumers In Pennsylvania

Rod Williamson, Executive Director

rwilliamson@clarkhill.com

910-444-8883



Industrial Energy Consumers of Pennsylvania

According to Jeff Berman, manager of emissions and clean energy at S&P Global Platts Analytics¹:

- About \$6/MWh added to coal-fired power cost
- About \$2/MWh added to gas-fired generation

The increased cost is unnecessary to achieve carbon dioxide reductions!

Carbon dioxide emissions in Pennsylvania have decreased just as much on a percentage basis as the other states participating in RGGI and have decreased MORE than other RGGI states on an absolute basis without the added cost of the RGGI program!

Table 2. State energy-related carbon dioxide emissions by year, adjusted (2005–2016)

State	Change (2005–2016)	
	Percent	Absolute
Connecticut	-23.0%	-10.3
Delaware	-21.5%	-3.7
Maine	-29.6%	-7.0
Maryland	-30.6%	-25.5
Massachusetts	-24.8%	-21.3
New Hampshire	-36.0%	-7.8
New York	-22.7%	-48.3
Pennsylvania	-22.8%	-64.7
Rhode Island	-13.9%	-1.6
Vermont	-13.5%	-0.9

Source: United States total, *Monthly Energy Review*,

Source: EIA, State Energy Data System, and EIA calculations made for this analysis.

<https://www.eia.gov/environment/emissions/state/analysis/>

Pennsylvania has already taken steps to increase renewable energy supply *and Pennsylvania’s competitive market continues to add lower carbon dioxide emitting generation while decreasing cost to customers!*

The impact to electricity prices and energy intensive manufacturing must be studied and the impacts fully understood. Cost control mechanisms and direct allocation of auction revenues to energy intensive manufacturing must be considered.

¹ “Joining RGGI to boost Pennsylvania gas-, coal-fired power prices, double emissions traded”, Oct. 4, 2019

<https://www.spglobal.com/platts/en/market-insights/latest-news/coal/100419-joining-rggi-to-boost-pennsylvania-gas-coal-fired-power-prices-double-emissions-traded>

The Voice of Large Energy Consumers In Pennsylvania

Rod Williamson, Executive Director

rwilliamson@clarkhill.com

910-444-8883



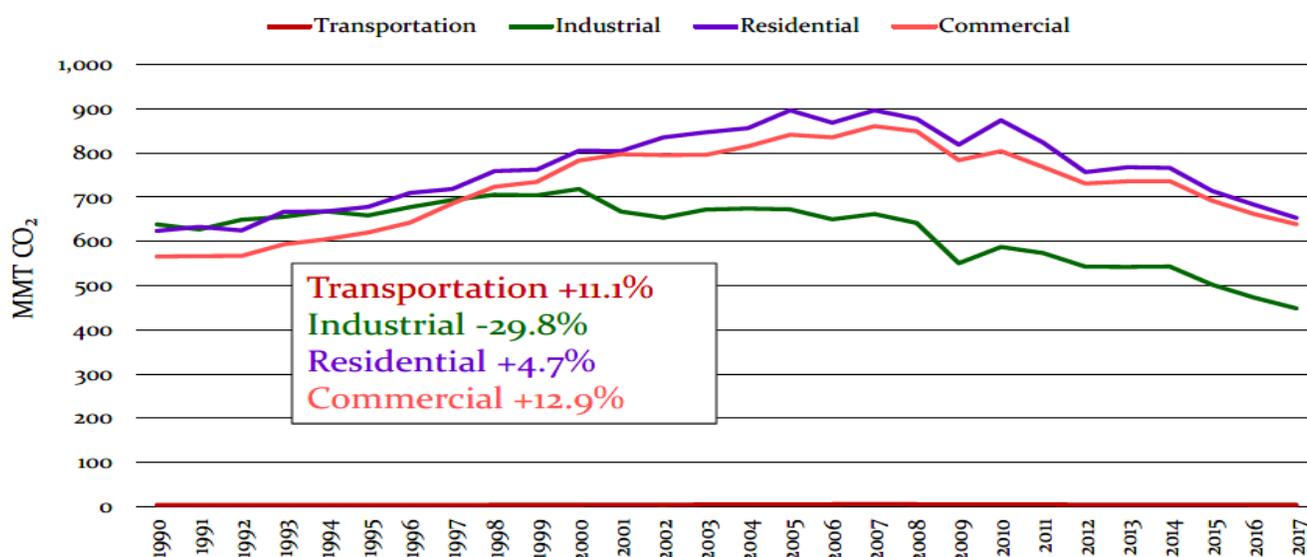
Industrial Energy Consumers of Pennsylvania

For instance, Maine’s RGGI program has a set aside of a certain amount of CO2 offset allowances to serve as a buffer for CO2 credit cost control.

“(2) Cost Containment Reserve (CCR) allocation. The Department shall allocate CO2 CCR allowances, separate from and additional to the CO2 Budget Trading Program base budget set forth in subsection 2(A) of this Chapter to the auction account. *The CCR allocation is for the purpose of containing the cost of CO2 allowances.*”²

Industrial / manufacturing customers have already achieved the greatest reduction of their CO₂ emissions associated with energy usage through their commitment to energy efficiency and should not be penalized by a RGGI program.

CO₂ Indirect Emissions by Sector: Industrial sector emissions are 30% below 1990



Source: Total Energy, U.S. Energy Information Administration (EIA)



IECPA stands willing to be a resource for the DEP on these matters to provide the perspective of the energy-intensive manufacturing operations for consideration.

Sincerely,

² State Statutes & Regulations: <https://www.rggi.org/program-overview-and-design/state-regulations>

The Voice of Large Energy Consumers In Pennsylvania

Rod Williamson, Executive Director

rwilliamson@clarkhill.com

910-444-8883