Citizen's Advisory Council
January 21, 2014

Comments of the Clean Air Council of Pennsylvania on Pennsylvania's Proposed Climate Change Action Plan.

Thank you for accepting these comments from Clean Air Council ("the Council") on the DEP's Climate Change Action Plan. The Council is a non-profit organization in Philadelphia that has been working since 1967 to carry out our mission of protecting everyone's right to breathe clean air.

The Council is greatly disappointed that the proposed Climate Change Action Plan lacks a goal for emissions reduction. For instance, DEP's 2009 climate plan sought to reduce carbon dioxide emissions by 30% in 2020. This proposal by Pennsylvania Department of Environmental Protection (DEP) is NOT an action plan. It has no greenhouse gas (GHG) emission reduction targets and it provides no clear path to reducing GHG emissions in Pennsylvania.

In light of this, DEP's plan relies on the U.S. Environmental Protection Agency's (EPA) limits on carbon dioxide emissions from new and existing power plants to achieve GHG reductions. Pennsylvania has been sending out mixed messages on its support for EPA's rulemaking which will address carbon dioxide emissions from new and existing power plants.[1] If the Pennsylvania Climate Action Plan intends to incorporate the EPA's rulemaking into state policy, the Council suggests that PA DEP publicly and unequivocally demonstrates its commitment to working with the EPA to reduce carbon emissions from power plants and that they incorporate the state implementation of the carbon rules into the action plan.

The Council finds the climate plan's energy policy recommendations particularly ineffective in addressing climate change as it relies mostly on promoting natural gas, a fossil fuel that is a far more potent greenhouse gas (GHG) than carbon dioxide in the short term and therefore will not truly reduce GHG emissions. In Pennsylvania, methane emissions from oil and natural gas operations increased by 12 percent from 2011 to 2012. This increase can almost entirely be credited to the expansion of shale gas infrastructure.[2] Fracked gas is devastating to the climate, especially in the next two most critical decades. According to the Intergovernmental Panel on Climate Change, methane (read shale gas) is at least 72 times more potent a greenhouse gas than carbon dioxide over a twenty year time period. Recent data collected by National Oceanic and Atmospheric Administration researchers found that an amazing 9 percent of the gas produced in Utah gas fields leak to the atmosphere[3]. The gas industry is the largest human-made source of methane globally. We could make substantial progress on climate change if we focused on reducing methane at shale gas infrastructure and working to phase out our reliance on this fossil

[1] http://www.scribd.com/doc/172703629/PA-DEP-Secretary-Christopher-Abruzzo-complains-about-new-EPA-power-plant-standards
[2] http://ghgdata.epa.gov/ghgp/main.do
[3] http://cires.colorado.edu/news/press/2013/methaneleaks.html

fuel. Yet Pennsylvania continues to eagerly subsidize the expansion of natural gas. The Commonwealth Financing Authority gave $2 million toward establishing five natural gas fueling stations in PA. Pennsylvania's 25-year $1.6 billion offer to the Shell cracker plant stands as the largest state subsidy to the already profitable natural gas industry and should be acknowledged as a substantially subsidized energy source. The Council believes DEP should put the current effort upon expanding the gas industry toward increasing wind and solar generation capacity. But Pennsylvania's proposed plan ironically ignores these most important opportunities to solving climate change – energy efficiency and renewable energy.

The Council urges DEP to seriously consider the large amount of greenhouse gas reductions that could be achieved through energy efficiency. DEP should advise the Uniform Construction Code Review and Advisory Council to implement efficiency measures, specifically by adopting the 2012 International Energy Conservation Code. DEP claims that since 2009, "Half of the decrease in energy usage can be attributed to reductions from the residential sector," and this was simply because of the economic downturn. This means that updated building codes could reduce energy consumption 15% by 2030. This is about 45 million megawatt hours of energy or about 40% of Pennsylvania's coal fleet.

The Council also recommends that Pennsylvania's plan prioritizes renewable energy sources that do not emit carbon dioxide during energy generation. For example, additional waste-to-energy facilities should not be a part of Pennsylvania's efforts to reduce greenhouse gas pollution. Trash incinerators emit 2,988 tons of carbon dioxide per mega-watt hour generated and, even worse from a public health perspective, emit toxics like mercury and lead.[4]

DEP should recommend increasing the Alternative Energy Portfolio Standards (AEPS) in Pennsylvania to at least 20% by 2022 without raising requirements for Tier 2 alternative fuels. Currently there are four times the amounts of solar renewable energy credits (SREC) in Pennsylvania than are required to be purchased under the current AEPS, so there is no question about feasibility. Of states that have renewable portfolio standards, Pennsylvania has one of the weakest in the country. The proposed increase to a mere 15% renewable energy under recent house and senate bills would still leave Pennsylvania with the third weakest standard well behind New York's 29% by 2015 and New Jersey and Maryland's 20% by 2021 and 2022, respectively.

The Council believes that Pennsylvania should close its borders for Solar Renewable Energy Credits (SREC) in order to boost the value of solar energy in Pennsylvania. While the Climate Change Advisory Committee stated that they intend to "**e**ncourage renewable and alternative energy suppliers to enter Pennsylvania's market," the final plan does little to accomplish this. Neighboring states have already seen the promise of renewable energy. For instance, New York's NY-Sun Initiative plans to increase their solar array from 300 MW to 3,000 MW, powering 465,000 homes and creating 13,000 jobs in

[4] http://www.epa.gov/waste/nonhaz/municipal/wte/airem.htm

construction and maintenance.[5] If Pennsylvania electric utilities continue to be allowed to purchase their solar credits from out of state, there is little incentive for increased solar generation in Pennsylvania.

In closing, the Council believes that DEP has a long way to go in providing a realistic path to reducing GHG emissions in Pennsylvania. The plan lacks greenhouse gas emission reduction targets, relies way too heavily on the natural gas industry, and is severely lacking in its promotion of energy efficiency and truly renewable energy. Please take the Council's concerns and recommendations about the Climate Action Plan into consideration. The Council encourages DEP to fix the inadequacies of the plan and reissue a strong plan that will limit greenhouse gas emissions, protect air quality and public health, and build a strong economy based on renewable energy. Thank you for your time.

[5] http://www.hydrogenfuelnews.com/new-york-embarks-ambitious-journey-solar-energy/8515959/