

SENATOR  
**GENE YAW**  
23RD SENATORIAL DISTRICT

362 MAIN CAPITOL  
SENATE BOX 203023  
HARRISBURG, PA 17120-3023  
(717) 787-3280  
FAX (717) 772-0575

175 PINE STREET, SUITE 105  
WILLIAMSPORT, PA 17701  
(570) 322-6457  
FAX (570) 327-3703  
TOLL FREE (800) 443-5772

[www.senatorgeneyaw.com](http://www.senatorgeneyaw.com)



**Senate of Pennsylvania**

July 24, 2020

**COMMITTEES**

ENVIRONMENTAL RESOURCES & ENERGY  
CHAIR  
AGRICULTURE & RURAL AFFAIRS  
VICE CHAIR  
APPROPRIATIONS  
BANKING & INSURANCE  
JUDICIARY  
LAW & JUSTICE  
MAJORITY POLICY COMMITTEE

THE CENTER FOR RURAL PENNSYLVANIA  
CHAIRMAN

Honorable Patrick McDonnell  
Secretary  
Pennsylvania Department of Environmental Protection  
16<sup>th</sup> Floor Rachel Carson State Office Building  
P.O. Box 2063  
Harrisburg, PA 17105-2063

Dear Secretary McDonnell:

On July 9, 2020, the enclosed letter was circulated to members of the EQB ostensibly by businesses supporting DEP's proposed RGGI regulations. A signatory to that support letter was ICF, the company which DEP has hired to do the modeling supporting the DEP RGGI proposal. I am not going to waste either of our time by detailing why this scenario raises serious ethical issues as well as questions of transparency. In short, ICF has shown that it is biased and that its modeling work will always be subject to question.

DEP has had its RGGI proposal rejected by three citizens advisory groups composed of membership chosen by the administration. Now, the company hired to do impartial modeling clearly cannot continue in that capacity. DEP needs to do a top to bottom reboot of the RGGI idea. A beginning might be to talk to the legislature.

Sincerely,

A handwritten signature in blue ink, appearing to read "Gene Yaw".

GENE YAW  
SENATOR

Enclosure

pc: Republican Senators  
Members, Environmental Quality Board



7group



AJT  
architect

ALTURUS



CHP-Funder



CREE LIGHTING

Digital More AIA LLC



DIGSAU

July 9th, 2020

Dear Members of the Pennsylvania Environmental Quality Board:

We are a diverse group of businesses, business associations, and nonprofits who recognize the economic and social value of energy efficiency and renewable energy investment. Investments in energy efficiency and renewable energy can reduce Pennsylvanians' energy costs, strengthen business investment, and create local jobs, all while reducing carbon and air pollution. For these reasons, we urge you to advance a proposed carbon trading budget program that enables the investment of proceeds into energy efficiency and renewable energy programs.

Now more than ever, the state needs investment in a new clean energy economy. The clean energy industry lost more than 21,000 jobs in Pennsylvania in March and April alone. Short-term stimulus is needed to recover these jobs sooner than RGGI proceeds will become available, but an ongoing commitment to investment in energy efficiency and clean energy will allow these industries to be the jobs engine of Pennsylvania's economic recovery. The COVID-19 crisis has also demonstrated the importance of investing in resiliency so that communities may continue to function and maintain essential services like energy in times of widespread disruption.



DNV-GL



ecofinlaw LLC



ENVINITY

EPIC

weSai



FRANKLIN



GreenEnergy  
EconomicsGroup



At the same time, Pennsylvania and the nation are in the midst of a moment of reckoning for the significant racial disparities that persist in our society. While investments in a clean energy economy alone cannot resolve these disparities, inclusive, strategic investments can help reduce the disproportionately higher energy burden and energy-related pollution levels in communities of color.

As directed by Executive Order 2019-07, the Department of Environmental Protection (DEP) is currently developing a carbon budget trading program that will allow Pennsylvania to join RGGI, a bipartisan multi-state effort to reduce carbon pollution and invest in stronger, cleaner state economies. The program will require qualifying power plants to purchase allowances through auctions in order to emit carbon. Proceeds generated from these auctions are available to fund initiatives that save consumers money, deploy clean energy, and improve air quality. For example, in recent years, RGGI states have invested more than 72% of their proceeds into energy efficiency and renewable energy programs. These investments have generated over \$4 billion in net economic benefits in the form of new jobs, customer utility bill savings, and private investment.

In Pennsylvania, the value of RGGI proceeds could reach \$300 million or more annually. This represents a significant resource to deploy toward distributed clean energy, launch new and bolster existing energy-saving programs, and strengthen the resilience of our power grid. Since renewable energy and energy efficiency investments accounted for more than 90,000 jobs across the state in 2019, this additional investment stands to strengthen our economy and create more local jobs.

**HEAT & POWER**  
EST. 1979

**HT** HENRY F. TECHMAN, INC.

**OK**  
h+k

**ICF**

**Integrated CHP**  
Systems Corp.

**INCH**  
and METER

**Carbon**

**KEEA**  
ELECTRICITY DELIVERY SERVICE

**LUTRON**

**MACHT** ARCHITECTURE

**MaGrann**

**M**  
MICHAEL B. WATSON

**ORIDEN**  
EST. 1988

**PASHEK** MTR

For these reasons, we encourage you to prioritize the following objectives for the investment of RGGI proceeds. Specifically, RGGI proceeds should be used to:

- 1) Fund services and incentives to help Pennsylvanians reduce their energy use and lower costs for fuels not already served by Pennsylvania's Act 129 programs, including fuel oil, propane, and wood; and to switch from those fuels to high-efficiency electric heating and cooling.
- 2) Implement programs that encourage market segments facing unique barriers and requiring focused support, such as low-income households, communities of color, small businesses, nonprofits, and certain industrial segments, to invest in energy efficiency and renewable energy.
- 3) Drive investment in distributed renewable energy through programs that support low-income community solar, microgrids that are powered by renewable energy and energy storage, and innovative grid-storage solutions.
- 4) Support combined heat and power units that help manufacturers, hospitals, campuses, and other energy-intensive facilities reduce their greenhouse gas emissions, increase energy efficiency, and reduce energy costs.
- 5) Offer financing, grants, and low- and no-interest loans to support the implementation of renewable energy and energy efficiency for all Pennsylvania consumers and businesses.
- 6) Establish a new clean energy economic development office to attract new clean energy manufacturing and provide workforce training programs across the state, especially in those areas most impacted by the changing economics of energy.



RECURVE



Schaedler  
*yesco*

Sealed



Solar Turbines  
*A Cooper Industries Company*



TURBINE INLET COOLING  
ASSOCIATION

uplight



In closing, we stand ready to work with you to develop an effective policy for the Commonwealth. We welcome the opportunity to meet with you or to provide additional information on the benefits that RGGI could provide to the state.

Sincerely,

- 2G Energy Inc
- 7group
- AIA Pennsylvania
- AJF Architect
- Alturus
- BAU Architecture, LLC
- CCI, Inc
- Ceres
- Combined Heat and Power Alliance
- CHP-Funder.com
- Compton Insights
- Cree Lighting
- Daphne More AIA LLC
- DCK Power Solutions
- DIGSAI
- DMI Companies
- DNY-GL Energy Services USA Inc
- E2
- eco(n)law LLC
- Energy Opportunities, Inc.
- Envivity, Inc
- Epic Metals
- eSat LLC
- evolve LLC
- Facility Solutions Group
- Franklin Energy
- Green Building United
- Green Energy Economics Group, Inc.
- Green Stone Energy
- GreenBeams
- Heat is Power Association
- Henry F. Teichmann Inc.
- HOK
- ICF
- Inch and Meter, PC
- Integrated CHP Systems Corp.
- Karbon Architects
- Keystone Energy Efficiency Alliance
- Lutron Electronics Co., Inc.
- Macht Architecture
- McGram Associates
- Moshier Studio
- Oriden
- Pashek - MTR
- Performance Systems Development
- Practical Energy Solutions
- Recurve
- RM Green Environmental Services, LLC
- Schaedler Yesco Distribution, Inc.
- Sealed
- Sheet Metal & Air Conditioning Contractors' National Association of Pennsylvania
- SMP Architects
- Solar Turbines Inc.
- Sterling Energy Group, LLC
- Sustainable Business Network of Greater Philadelphia
- Sustainable Pittsburgh
- Turbine Inlet Cooling Association
- Uplight
- Verde Architecture Consulting
- Warren Energy Engineering
- Willdan

Cc:  
Sam Robinson, Deputy Chief of Staff, Office of Governor Wolf  
Hayley Book, Senior Advisor on Energy and Climate, PA DEP