



TO: The Honorable Members of the Senate Environmental Resources and Energy Committee

FROM: Kevin Sunday, Director, Government Affairs

DATE: September 14, 2021

RE: Support Disapproval of EQB's CO2 Budget Trading Program

On behalf of the PA Chamber of Business and Industry I urge you to exercise your power under the Regulatory Review Act to advance a resolution disapproving the Environmental Quality Board's final-form regulation to implement a CO2 Budget Trading Program, which was advanced on Sept. 1 by the Independent Regulatory Review Commission and will enter Pennsylvania into the Regional Greenhouse Gas Initiative.

We have noted throughout this process that we recognize climate change is and will continue to present significant challenges to this state, and that effective policy will require business to have a seat at the table so that costs do not exceed benefits. We have outlined our specific concerns with respect to Pennsylvania entering into RGGI, including the need to guard against displacing generation to non-RGGI states in the PJM grid, to protect our state's industrial base and lead role as an electricity exporter, and to be explicit about the costs of this approach. In our view, these concerns have not been meaningfully addressed in the final regulation, and therefore we respectfully encourage this committee and the General Assembly to advance a disapproval resolution against this regulation.

For any questions or further discussion, please contact Kevin Sunday, Director of Government Affairs, at [ksunday@pachamber.org](mailto:ksunday@pachamber.org) or (717) 645-2071.