



## **BCSE Comments for Pennsylvania Department of Environmental Protection Listening Session on Final Clean Power Plan**

September 15, 2015

Thank you for the opportunity to participate in this first listening session on the Clean Power Plan for regulating carbon emissions from existing power plants and recommendations for Pennsylvania's State Plan.

My name is Lisa Jacobson and I am the President of the Business Council for Sustainable Energy.

The Business Council for Sustainable Energy is a coalition of companies and trade associations from the energy efficiency, renewable energy and natural gas sectors, and also includes independent electric power producers and investor-owned utilities.

Founded in 1992, the Council advocates for policies at the state, national and international levels that increase the use of commercially-available clean energy technologies, products and services. The coalition's diverse business membership is united around the revitalization of the economy and the creation of a secure and sustainable energy future for America.

BCSE is a national organization and has members with commercial activity and jobs in the Commonwealth. BCSE members see PA as an opportunity state for investment.

The release of the final Clean Power Plan marks a significant milestone on the path to cleaner, more efficient sources of power generation in PA, using affordable, readily-available technologies.

According to a study by Bloomberg New Energy Finance and the BCSE, expansion of renewable energy and additional opportunities in energy efficiency, along with the flexibility to develop its own pollution reduction plan, put Pennsylvania well on the path to reducing the state's greenhouse gas emissions.

Given its current and pending pipeline of emission reduction activities, Pennsylvania has already made significant progress toward meeting its final 2030 targets.

Specifically, plant retirements from its fossil fleet, increased utilization of natural gas and current and pending renewables build take Pennsylvania 9% toward meeting its 2030 rate-based target, while the state is already 46% of the way towards achieving its 2030 mass-based target, according to Bloomberg New Energy Finance.

Further, the study finds that sustainable electricity sources including natural gas, small hydropower and onshore wind are already among the cheapest options for generating electricity in the state. Also, PA should consider supply-side and demand-side energy efficiency.

The Clean Power Plan also offers a great opportunity for constructive partnership between state policy-makers and the private sector, with clear paths to explore state-specific and multi-state options for compliance.

The Business Council for Sustainable Energy and its members are committed to helping the Commonwealth adapt clean energy solutions to its unique circumstances.

BCSE will provide additional comments on the PA state plan in the coming weeks and at future listening sessions.

At this time, I would like to offer the following preliminary recommendations for PA's state plan:

- PA should consider participation in the Clean Energy Incentive Program (CEIP). The program is still under development and BCSE is working with EPA and states to ensure that the CEIP provides a clear signal for action and does not delay investment in energy efficiency and renewable energy the 2016 to 2020 time period.
- PA should adopt a "trade ready" approach, and should consider market-based elements to ensure cost effective compliance.
- PA should consider the full portfolio of clean energy technologies and resources for compliance planning. This includes rate-payer and non-rate payer programs and actions, including third party delivered energy efficiency.
- Further, if PA allocates allowances or auction allowances under its state plan, it should provide allowance value to clean energy technologies and resources to spur investment and provide clean energy market signals.

Thank you again for the opportunity to share the Council's views at this important listening session.