



**Statement of Joy Bergey, Partnership for Policy Integrity**  
**Pennsylvania Department of Environmental Protection Listening Session on the Clean Power Plan**  
**Harrisburg, Pa.**  
**September 14, 2015**

Thank you for the opportunity to comment. My name is Joy Bergey. I live in Flourtown. I represent the Partnership for Policy Integrity, a nonprofit that advocates for clean energy and provides science and legal advocacy to reduce reliance on polluting energy technologies that masquerade as “clean.”

We will be submitting detailed written comments on Pennsylvania’s implementation plan, so I will just speak briefly to express our concern regarding use of natural gas and bioenergy as compliance measures in Pennsylvania’s Implementation Plan.

Pennsylvania’s coal use has declined in recent years, while natural gas use has increased. This is mixed news for the climate, however, because emerging evidence indicates that gas wells and infrastructure are leaking significantly more methane than initially believed.

Given this reality, the Clean Power Plan undervalues the warming impact of natural gas in two important ways. First, the CPP regulates stack emissions, not upstream emissions, so the impact of the methane leakage from wells and infrastructure is largely invisible to the Plan.

Second, while the most recent report of the Intergovernmental Panel on Climate Change states that methane is **86** times more powerful as a greenhouse gas than carbon dioxide over a **20** year period, the Clean Power Plan relies on an outdated figure previously published by the IPCC, stating that methane is only **25** times more powerful than carbon dioxide over **100 years**, a timeframe that is hardly relevant given the Plan’s goal to reduce emissions by 2030. The take-home message here is, the more Pennsylvania avoids relying on natural gas, the more real progress can be made on reducing emissions.

We also hope that DEP will steer clear of biomass and waste burning as compliance measures for the Clean Power Plan, both in standalone biomass power plants and as biomass co-firing in coal plants. As EPA makes clear in the plan, burning biomass for electricity generation – which often amounts to burning trees – not only emits more CO<sub>2</sub> per unit energy than burning fossil fuels, but co-firing biomass with coal actually *decreases* coal plant efficiency – thus running counter to EPA’s first “building block” for the Best System of Emissions Reduction, which is *increased* coal plant efficiency.

There is nothing special about biogenic CO<sub>2</sub> molecules – they warm the atmosphere just as effectively as CO<sub>2</sub> from fossil fuels. Claims that biogenic CO<sub>2</sub> *doesn’t* warm the atmosphere are

based on the idea that emissions from burning biomass are eventually offset by new tree growth, or avoided decomposition emissions when waste materials are burned for biomass.

However, EPA has made it clear that emissions reductions claimed in State Implementation Plans need to be "quantifiable, verifiable, non-duplicative, permanent and enforceable."<sup>1</sup> Biomass generally can't fill the bill. Further, burning biomass emits similar amounts of carbon monoxide, nitrogen oxides, particulate matter, and heavy metals as coal per megawatt-hour, increasing emissions impacts on surrounding communities and negating the considerable air quality and health benefits that EPA claims for the CPP.

There is no guarantee that the Clean Power Plan will actually reduce greenhouse gas emissions. The EPA itself states the plan may spur increased energy efficiency that leads to lower emissions and lower electricity costs, but "the trends for all other types of generation, including natural gas-fired generation, nuclear generation, and renewable generation, will remain generally consistent with what their trends would be in the absence of this rule."<sup>2</sup> To *really* reduce emissions, not just on paper, Pennsylvania will have to aim much higher. The State's plan should move beyond natural gas and reject solid biomass combustion as compliance, focusing instead on energy efficiency and truly clean energy such as solar and wind.

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<sup>1</sup> Plan, page 1168

<sup>2</sup> Plan, page 637