



Statement of Joy Bergey, Partnership for Policy Integrity

Pennsylvania Department of Environmental Protection Listening Session on the Clean Power Plan

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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.”

Today I am going to speak to DEP’s request for input on how Pennsylvania can meet its objectives of prioritizing indigenous resources, and of maintaining a diverse fuel mix, as it develops the state compliance plan.

We are actually concerned by these objectives, because we don’t really know what they mean. We hope they don’t mean that DEP is considering including polluting technologies like biomass and waste-burning as compliance in state’s compliance plan, and obviously, we hope that the state will do the utmost to go beyond EPA’s targets with zero-emissions compliance.

We are especially concerned that DEP not promote co-firing biomass with coal, or total conversion of coal plants to burn wood, as compliance measures for the Clean Power Plan. Certainly there are interest groups that would advocate harvesting Pennsylvania’s abundant forests and burning them as a replacement for coal. However, such conversions would actually increase carbon emissions from the power sector. This is not speculative – it is a fact. Wood-burning power plants emit more CO₂ per megawatt-hour than burning coal, and harvesting forests for fuel further contributes to rising CO₂ levels by degrading the forest’s ability take carbon out of the air. These facts convinced Massachusetts to eliminate renewable energy subsidies for large-scale wood-burning electricity plants in 2012, because the state concluded it made no sense to incentivize replacing coal with something that emits more CO₂ than coal. These problems with bioenergy are acknowledged by EPA, which is another reason why Pennsylvania should hew to solutions that clearly and quickly reduce emissions, if the state wants to get a compliance plan approved rapidly.

Eliminating from consideration any combustion-based renewable energy options will also help protect Pennsylvania’s air quality. Biomass and waste-burning are very polluting, emitting particulate matter and nitrogen oxides, precursors of smog and ozone, in quantities similar to or greater than coal. Given that EPA has just lowered the bar further on the air quality standard for ground-level ozone, some counties in Pennsylvania will have to work to come into attainment with the new standard. The problem is that the warmer the climate gets, the more easily ground-level ozone forms, meaning that greater reductions in emissions of ozone

precursors will be required to achieve the same level of reduction in the future. However, this is another way that an aggressive compliance plan to reduce CO₂ emissions can help Pennsylvania – by replacing polluting technologies with zero-emissions renewables and energy efficiency, the state can leverage the Clean Power Plan to help achieve compliance with the new ozone standard.