



January 13, 2021

**Submitted via email at [ReqComments@pa.gov](mailto:ReqComments@pa.gov)**

Commonwealth of Pennsylvania  
Environmental Quality Board  
P.O. Box 8477  
Harrisburg, PA 17105-8477

**Re: Comments on CO2 Budget Trading Program Regulation**  
Proposed Environmental Quality Board Rulemaking  
Pennsylvania Bulletin, Vol. 50, NO. 45, Page 6212 – November 7, 2020

The Building Performance Association (BPA) appreciates the opportunity to provide these supplemental comments on the Environmental Quality Board’s (EQB) proposed amendment to Chapter 145 to establish a trading program for carbon dioxide emissions - the CO2 Budget Trading Program Regulation.

*BPA supports the adoption of the CO2 Budget Trading Program Regulation because doing so will help create more jobs in the Commonwealth.*

### **Background on the Building Performance Association**

BPA is a membership-driven 501(c)(6) industry trade association focused on the home and building performance industry - delivering improved energy efficiency, health, safety, and environmental outcomes. Our national headquarters is based in Pennsylvania. BPA supports home performance contractors, weatherization agencies and training centers, energy efficiency manufacturers and suppliers, small businesses, and local non-profits focused on residential and commercial energy efficiency.

BPA’s 748 Pennsylvania members and affiliates provide the “nuts and bolts” of efficiency upgrades to homes and buildings across the state. We salute the high-quality services that our members and affiliates deliver and the skilled jobs that they create in communities across the Commonwealth. BPA is proud to serve 11,320 members across the United States.

## **Energy Efficiency and Job Creation in Pennsylvania**

We urge the EQB to approve the CO2 Budget Trading Program Regulation because it will help increase the **71,443 energy efficiency jobs** in Pennsylvania, many of which are part of a highly skilled workforce. We see firsthand every day that Pennsylvanians value the energy efficiency programs that add new insulation in homes, upgrade lighting in schools, and install new equipment in manufacturing facilities and help residents and businesses save money on their utility bills. Our customers are grateful for buildings and homes that are more comfortable, healthier, and less expensive to maintain thanks to private sector market forces and the adoption and implementation of energy efficiency programs such as Act 129.

## **Pennsylvania Needs to Catch up with Other States on Energy Efficiency Jobs Creation**

Joining the Regional Greenhouse Gas Initiative (“RGGI”) will help the Commonwealth catch up with neighboring states in the creation of energy efficiency jobs. BPA believes that the Commonwealth can do much better on job creation in the energy efficiency market sector. BPA has seen that adopting RGGI is a valuable and proven tool that will get results. For example, participating RGGI states have invested over half their proceeds into energy efficiency, generating over \$4 billion in economic benefits. In those RGGI states where a significant portion of RGGI proceeds have been directed toward energy efficiency programs, job creation increases and additional private sector investments have driven new economic growth in this critical and emerging energy efficiency market sector.

In 2019, and again, in a newly released [2020 Energy Efficiency Jobs in America Report](#), ***Pennsylvania ranked 41<sup>st</sup> in per capita employment*** among states in energy efficiency (See State Rankings on pages 4-5 of this letter). Pennsylvania’s per capita employment rate in energy efficiency jobs is *approximately one half of the per capita employment rate in neighboring Maryland*. Indiana and Ohio are also far ahead of Pennsylvania on the per capita job creation rates in the energy efficiency industry, one of the fastest growing energy sectors in the nation. Adopting RGGI will help the Commonwealth catch up in its job creation potential with other states in this critical market sector. A recently released fact sheet and analysis of energy efficiency jobs and trends in the Commonwealth is available in the new [2020 Energy Efficiency Jobs in America Report](#).

## **Energy Efficiency Programs Can Create Many More Jobs in the Commonwealth**

BPA has seen in states across the country that properly designed and implemented energy efficiency programs to be the lowest cost, most predictable and most immediate method to manage energy demand, create local jobs, provide opportunities for small business energy efficiency entrepreneurs while also providing health and comfort benefits to consumers and lower utility bills. By adopting the CO2 Budget Trading Program, Pennsylvania will be able to devote additional resources to economic development and energy efficiency programs that will provide critical post-COVID economic stimulus benefits to Pennsylvania.

BPA works with many states that have already moved forward and adopted innovative best practice policies that have created thousands of energy efficiency jobs and attracted significant private sector investments in this rapidly expanding industry. Joining RGGI is just one of these proven, best practice approaches to economic development. BPA stands ready to assist the Commonwealth in implementing other proven strategies to enhance job creation and private sector investments in energy efficiency.

### **Pennsylvania Can Keep Electricity Rates Low and Invest in Job Training for the Future**

Participating RGGI states have invested over half their proceeds into energy efficiency, generating over \$4 billion in economic benefits. In addition to job creation benefits, other RGGI states have also been able to keep electric bills for customers low. Electricity wholesale prices dropped by 5.7% in RGGI states, even as the rest of the country saw increases of 8.6%.

Several of the RGGI states have also invested wisely in job training programs for new energy efficiency jobs. RGGI auction proceeds can fund training centers that provide the necessary coursework for new energy workers to succeed at energy efficiency careers. BPA believes that workforce development and training programs supported with RGGI based investments could play a critical role in moving the energy efficiency industry forward in the Commonwealth.

### **Conclusion**

BPA appreciates this opportunity to provide comments on the adoption of the CO2 Budget Trading Program Regulation. Moving forward expeditiously with the CO2 Budget Trading Program Regulation and joining RGGI will provide Pennsylvania's economy with a shot in the arm at a time when the Commonwealth's economy urgently needs to recover its footing.

Please feel free to contact BPA via my email listed below should you have any questions about the research and policy information provided in these comments.

Respectfully Submitted,



J. Joseph Cullen  
Director of Policy and State Outreach  
Building Performance Association, Suite #340  
1187 Thorn Run Road Extension  
Moon Township, PA 15108  
[JCullen@building-performance.org](mailto:JCullen@building-performance.org)  
[www.building-performance.org](http://www.building-performance.org)

## 2020 U.S. Energy Efficiency Jobs Per Capita By State

State	Gross EE Jobs	Population	EE Jobs Per Capita	Per Capita Rank	Gross Jobs Rank
DC	12,982	705,749	0.0184	1	37
VT	11,032	623,989	0.0177	2	41
WY	7,568	578,759	0.0131	3	46
DE	12,543	973,764	0.0129	4	38
MA	88,231	6,892,503	0.0128	5	6
RI	13,028	1,059,361	0.0123	6	36
MD	71,337	6,045,680	0.0118	7	12
WI	63,569	5,822,434	0.0109	8	14
OR	42,935	4,217,737	0.0102	9	20
UT	32,483	3,205,958	0.0101	10	25
CT	36,000	3,565,287	0.0101	11	24
VA	80,181	8,535,519	0.0094	12	10
NH	11,913	1,359,711	0.0088	13	40
SD	7,628	884,659	0.0086	14	45
MI	85,323	9,986,857	0.0085	15	8
WA	64,930	7,614,893	0.0085	16	13
NC	88,001	10,488,084	0.0084	17	7
MN	47,114	5,639,632	0.0084	18	18
MT	8,838	1,068,778	0.0083	19	44
IN	55,663	6,732,219	0.0083	20	16
<u>CA</u>	323,529	39,512,223	0.0082	21	1
TN	53,916	6,829,174	0.0079	22	17
ND	5,581	762,062	0.0073	23	50
NE	13,949	1,934,408	0.0072	24	35
<u>IL</u>	91,024	12,671,821	0.0072	25	5
OH	83,165	11,689,100	0.0071	26	9
MO	42,537	6,137,428	0.0069	27	21

## 2020 U.S. Energy Efficiency Jobs Per Capita By State

State	Gross EE Jobs	Population	EE Jobs Per Capita	Per Capita Rank	Gross Jobs Rank
IA	21,165	3,155,070	0.0067	28	30
ME	8,879	1,344,212	0.0066	29	43
NY	126,739	19,453,561	0.0065	30	3
AL	31,546	4,903,185	0.0064	31	26
AK	4,701	731,545	0.0064	32	51
CO	36,092	5,758,736	0.0063	33	23
AZ	44,782	7,278,717	0.0062	34	19
KS	17,848	2,913,314	0.0061	35	31
SC	30,794	5,148,714	0.0060	36	27
GA	62,924	10,617,423	0.0059	37	15
KY	26,221	4,467,673	0.0059	38	28
TX	169,398	28,995,881	0.0058	39	2
FL	123,560	21,477,737	0.0058	40	4
<b>PA</b>	<b>71,443</b>	<b>12,801,989</b>	<b>0.0056</b>	<b>41</b>	<b>11</b>
MS	15,668	2,976,149	0.0053	42	32
AR	15,492	3,017,804	0.0051	43	33
ID	9,035	1,787,065	0.0051	44	42
LA	23,261	4,648,794	0.0050	45	29
HI	6,083	1,415,872	0.0043	46	49
NJ	37,982	8,882,190	0.0043	47	22
WV	7,144	1,792,147	0.0040	48	47
NV	11,988	3,080,156	0.0039	49	39
OK	15,046	3,956,971	0.0038	50	34
NM	6,099	2,096,829	0.0029	51	48

Sources: *Energy Efficiency Jobs in America* published November 2020. Population numbers are US Census estimations for 2019.