



P.O. Box 2277, Harrisonburg, VA 22801; 540-433-2451

March 31, 2023

Karen G. Sabasteanski
Department of Environmental Quality

Via email

Re: Repeal CO2 Budget Trading Program as required by Executive Order 9 (Revision A22)

Dear Ms. Sabasteanski:

Virginia Poultry Federation (VPF) supports the Department of Environmental Quality's (DEQ) proposed regulatory action entitled, "Repeal CO2 Budget Trading Program as required by Executive Order 9 (Revision A22)."

VPF is a statewide trade association representing all sectors of the poultry industry in Virginia, including poultry farms, processing plants, feed mills, hatcheries, and rendering facilities. The poultry industry employs more than 15,000 and directly contributes \$5.8 billion to Virginia's economy. Poultry facilities are energy intensive operations, and energy comprises a significant cost to the industry. Environmental stewardship is a top priority for poultry operations, and energy conservation is a significant focus.

In a filing before the State Corporation Commission, Dominion Energy stated that the Regional Greenhouse Gas Initiative (RGGI) will cost ratepayers between \$1 billion and \$1.2 billion over the next four years. These staggering sums are in addition to increased fuel costs that are inflating energy bills and the anticipated costs of Virginia ratepayers to comply with the Virginia Clean Economy Act.

CO2 emissions from power generation facilities in Virginia are already on the decline because of the Virginia Clean Economy Act and other factors unrelated to RGGI. Virginia's participation in RGGI manifests itself as a large tax on the ratepayers and is not closely connected with CO2 emissions reductions in the Commonwealth. While funding for coastal resiliency is important, it should be appropriated by the General Assembly rather than burdensome RGGI taxes on electricity.

Thank you for your consideration of our comments on this matter.

Sincerely,

A handwritten signature in black ink that reads "Hobey Bauhan".

Hobey Bauhan
President