



November 1, 2016

Environmental Protection Agency
EPA Docket Center (EPA/DC), Mail Code 28221T
Attention Docket ID No. EPA-HQ-OAR-2016-0033
1200 Pennsylvania Avenue, NW
Washington, DC 20460

Dear Administrator McCarthy,

Citizens for Pennsylvania's Future (PennFuture) is a nonprofit environmental advocacy organization that advances policies to protect Pennsylvanians. We appreciate the opportunity to provide comments in support of the Clean Energy Incentive Program (CEIP).

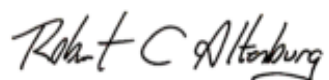
Low-income communities face disproportionate burdens from pollution and added risks from climate change. While these communities often have the most to gain, it is particularly challenging to increase the adoption of energy efficiency and renewable energy measures when limited resources are already strained. Because the CEIP is the only section of the Clean Power Plan targeted to address low-income communities, we support an **increase in the share of matching credits reserved for low-income communities.**

While an ideal program would narrowly target benefits to the communities most in need, we have concerns that an overly complex process of determining eligibility will limit the overall effectiveness of the program. This is particularly true in the case of the working poor who may not qualify for other programs. **While there must be a set of core standards, we support giving states some flexibility to tailor the qualification criteria to their specific needs.**

Although we support the goals of the CEIP, we recognize that providing additional credits to any state could increase pollution and move us further from our overall climate goals. For that reason, the use of the CEIP should be narrowly tailored to immediate needs such as those faced by low-income communities, and the need to spur early action and investment in renewable energy. **If a State decides to forgo participation in the CEIP, or does not allocate some or all**

of the available CEIP credits, we support retiring those credits rather than reallocating them until they result in pollution.

Once again, we appreciate the opportunity to voice these concerns as we comment in support of the CEIP.

A handwritten signature in black ink that reads "Robert C. Altenburg". The signature is written in a cursive style with a prominent "R" and "A".

Robert Altenburg

Director, PennFuture Energy Center