

Testimony on EPA’s Proposed Rule for “Standards of Performance for Greenhouse Gas Emissions for New Stationary Sources: Electric Utility Generating Units”

Docket Number EPA–HQ–OAR–2011–0660; FRL–9654–7

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Thank you for the opportunity to testify today. My name is Robert Collier and I am here on behalf of Environmental Defense Fund (EDF), a non-partisan environmental organization with more than 750,000 members nationwide and 37,000 members in Illinois. EDF is dedicated to working toward innovative cost-effective solutions to environmental problems, building on a foundation of sound science, economics, and law.

The proposed standards are an important step towards addressing the massive quantities of climate destabilizing pollution emitted from U.S. power plants, one of the largest sources of greenhouse gases (GHG) in the world. By halving the lifetime carbon emissions from new coal-fired power plants relative to a traditional coal plant, these historic clean air standards will provide long overdue and urgently needed protections for our health and climate while strengthening our *Made in the U.S.A.* clean energy economy.

Urgency of action: human health and climate impacts

Climate change presents a clear threat to the U.S. and to the world. The United States Global Change Research Program, started in 1989 as a Presidential initiative under George H.W. Bush, has determined that if carbon pollution is not reduced, it is likely that American communities will experience increasingly severe climate impacts.

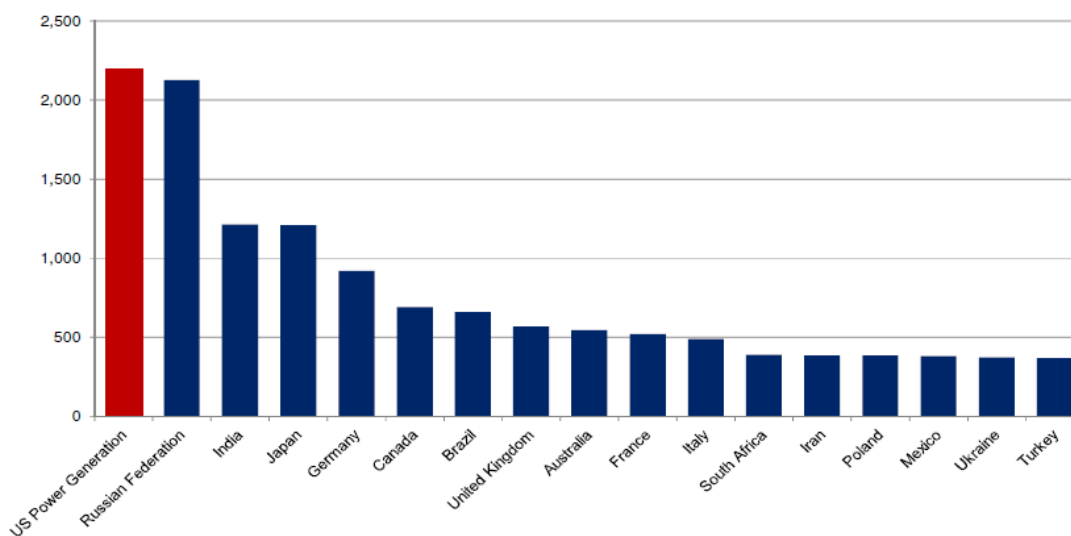
Since the 1980s, Midwesterners have been experiencing intense heat waves more frequently than any other time except the Dust Bowl era.ⁱ Data from the insurance industry reveals that in 2011 Americans saw 12 climate disasters causing at least a billion dollars of damage each, a record number of such events (see appended graphic). Among these disasters were two major floods in the Upper Midwest and the Mississippi River and a blizzard that paralyzed the region and brought Chicago to a standstill.ⁱⁱ Although any particular individual extreme weather event cannot be directly connected to climate change, changes in frequency and intensity can be connected—and these are precisely the type of impacts projected to affect American communities with increasing frequency and severity as climate-destabilizing emissions continue to accumulate in the atmosphere.

Unless our country takes aggressive action to reduce GHG emissions, climate impacts are projected to worsen. Severe heat waves such as the unprecedented 1995 event in Chicago could happen as often as every other year.ⁱⁱⁱ Furthermore, warmer temperatures will also lead to rising levels of dangerous smog pollution, which is known to cause heightened risk of respiratory infections, more asthma attacks, and more premature deaths.

Delay is not an option

In the interest of the health and prosperity of our citizens, ecosystems, and economies, we simply cannot afford additional delay. Each year U.S. power plants discharge over 2.3 billion tons of carbon dioxide pollution, an amount that exceeds total carbon emissions of industrialized nations such as Russia, Japan, and Germany (see graphic below). Since power plant infrastructure is extraordinarily long-lived -- the average retirement age of a coal plant is 50 years -- building just one inefficient, emission-intensive plant today locks us into millions of tons of future climate pollution.

U.S. Power Generation GHG Emissions Surpass Emissions from Most Countries (Million Metric Tons CO₂ Equivalent)



Source: UNFCCC - Sixth compilation and synthesis of initial national communications from parties not included in Annex I to the Convention, and National Greenhouse Gas Inventory Data for the period 1990 - 2009 (reflecting Annex I countries).

Midwestern states and the City of Chicago have led the way

During the past several years, states across the nation have adopted GHG emission standards for new fossil fuel fired power plants that have laid the groundwork for a strong national standard. Right here in the Midwest, communities are working together to lower carbon pollution and slow the serious impacts of a changing climate. For example, in 2007 Minnesota enacted the Next Generation Energy Act, which requires increases in power sector greenhouse gas emissions from any new large coal-fired power plants built in Minnesota or the import of electricity from such a facility located out-of-state to be offset by equivalent emission reductions.

The City of Chicago is taking immediate action both to mitigate additional impacts and adapt to changes already underway. With the Climate Action Plan launched in 2008, the City set on a path to reexamine the existing fleet of coal-fired power plants throughout the state, promote energy efficiency and renewable sources of energy, and adapt to climate changes already set in motion by reducing ozone-forming air pollution, managing the heat-island effect, and preparing the city for more intense heat waves.^{iv,v}

Shifting market dynamics are influencing utility sector business decisions

These standards are aligned with market forces that are already driving utilities to develop cleaner technologies. An April 2012 World Resources Institute report explains that “lower natural gas prices, declining growth in electricity demand, rising coal prices, and increased cost-competitiveness of renewables” are shaping business decisions in the utility sector.^{vi}

Leaders within the utility industry recognize the importance and achievability of EPA’s proposed standards. For instance, Ralph Izzo, CEO of Public Service Enterprise Group, issued the following statement immediately after EPA released the proposal:

“The Agency’s action establishes a logical and modest standard for new electric power plants and provides the industry with much needed regulatory certainty. The EPA provides a framework for the industry to confront this problem in a cost effective manner.”^{vii}

Diverse voices of support

In addition to the scores of citizens testifying today, over 1.2 million Americans have spoken out by submitting written comments in support of EPA’s historic proposed health protections. Groups that represent millions of Americans from all walks of life have also released strong supportive statements:

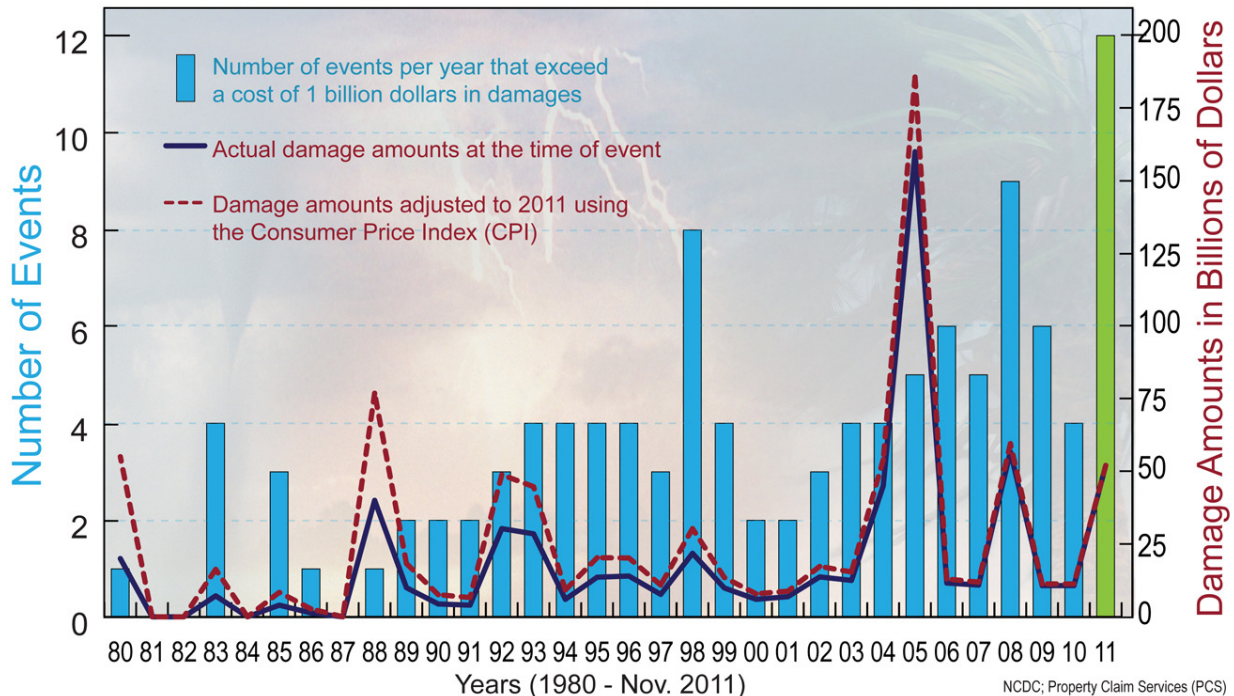
- *“**Catholics United** welcomes the EPA’s greenhouse gas rule...Care for creation is a central moral concern for many people of faith.”^{viii}*
- **BlueGreen Alliance:** *“Today’s rule ensures that new power plants will be built cleaner and more efficient, creating jobs and reducing greenhouse gas emissions and ensuring that the nation is competitive in the 21st century economy.”^{ix}*
- *“As the **nation’s largest online Latino advocacy group, Presente** is very pleased that EPA has announced these new standards to protect our health by limiting carbon pollution that causes global warming...This is a critical issue for Latino communities who will feel the impacts of climate change closely and directly whether from worsening smog, harsher summers, or worsening drought.”^x*
- *“**The American Public Health Association** welcomes a new standard for new power plants released today by the U.S. Environmental Protection Agency that will strengthen the Clean Air Act, reduce carbon pollution and protect public health.”^{xi}*

New clean air standards are a critical step in the right direction

Under EPA’s standards the nation’s energy needs can be met through a diverse, efficient mix of power sources, including renewable energy, efficient natural gas power plants, combined heat and power, and improvements in the efficiency of our energy use. The standards also provide a pathway for the development of carbon capture and sequestration for coal plants. The New Source Performance Standards for carbon pollution will provide power companies with regulatory certainty for prudent, long-term investments in cleaner, homegrown energy that puts Americans to work. The technology we need is available today. Working together, America can build the energy generation infrastructure we need to protect our health and strengthen our economy.



Billion Dollar Weather/Climate Disasters 1980 - November 2011 NOAA/NESDIS/NCDC



Source: NOAA, http://www.noaanews.noaa.gov/stories2011/20111207_novusstats.html

ⁱ U.S. Global Change Research Program, Global Climate Change Impacts in the United States, Regional Climate Impacts: Midwest (2009), available at <http://www.globalchange.gov/images/cir/pdf/midwest.pdf>.

ⁱⁱ Press release, Insurance Information Institute, "Private-Sector Insurers To Pay More Than \$32 Billion In Claims From Natural Disasters In 2011," December 30, 2011, available at http://www.iii.org/press_releases/private-sector-insurers-to-pay-more-than-32-billion-in-claims-from-natural-disasters-in-2011-.html.

ⁱⁱⁱ U.S. Global Change Research Program, Global Climate Change Impacts in the United States, Regional Climate Impacts: Midwest (2009), available at <http://www.globalchange.gov/images/cir/pdf/midwest.pdf>.

^{iv} Chicago Climate Action Plan, Clean & Renewable Energy Sources, available at <http://www.chicagoclimateaction.org/filebin/pdf/finalreport/CleanRenewableEnergy.pdf>.

^v Chicago Climate Action Plan, Adaptation, available at <http://www.chicagoclimateaction.org/filebin/pdf/finalreport/Adaptation.pdf>.

^{vi} James Bradbury, World Resources Institute, "U.S. Electricity Markets Increasingly Favor Alternatives to Coal," April 2012, available at http://pdf.wri.org/factsheets/factsheet_us_electricity_markets_favor_alternatives_to_coal.pdf.

^{vii} Press release, Public Service Enterprise Group, "Statement by PSEG Chairman and CEO Ralph Izzo on the EPA's Proposed Carbon Pollution Standards," March 27, 2012, available at <http://pseg.com/info/media/newsreleases/2012/2012-03-27.jsp>.

^{viii} Press release, Catholics United, "Catholics United Applauds Greenhouse Gas Health Standard," March 27, 2012, available at <http://www.catholics-united.org/content/press-release-catholics-united-applauds-greenhouse-gas-health-standards>.

^{ix} Press release, BlueGreen Alliance, “BlueGreen Alliance Applauds New Clean Air Protections,” March 28, 2012, *available at* <http://www.bluegreenalliance.org/news/latest/bga-applauds-new-clean-air-protections>.

^x Press release, Voces Verdes, “Latinos Can ‘Breathe Easier’ Thanks to EPA’s Proposed Carbon Pollution Standard,” March 27, 2012, *available at* http://www.vocesverdes.org/FINAL_FINAL_VOCES_3-26-12_Carbon_Rule_Release.pdf.

^{xi} Press release, American Public Health Association, “American Public Health Association cheers new clean air standard for power plants,” March 27, 2012, *available at* <http://www.apha.org/about/news/pressreleases/2012/epa+greenhouse+gas+rules.htm>.