Testimony
EPA's Proposed Rule
"Standards of Performance for Greenhouse Gas Emissions for New Stationary Sources: Electric Utility Generating Units"
Docket Number EPA–HQ–OAR–2011–0660

Presented by Mandy Warner
Climate & Air Policy Specialist
Environmental Defense Fund

May 24, 2012 Public Hearing
Washington, D.C.

My name is Mandy Warner and I am with Environmental Defense Fund (EDF), a non-partisan environmental organization with more than 750,000 members nationwide. EDF is dedicated to working towards innovative, cost-effective solutions to environmental problems, building on a foundation of rigorous science, economics, and law.

Thank you for the opportunity to testify today. 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 traditional coal plants, 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.

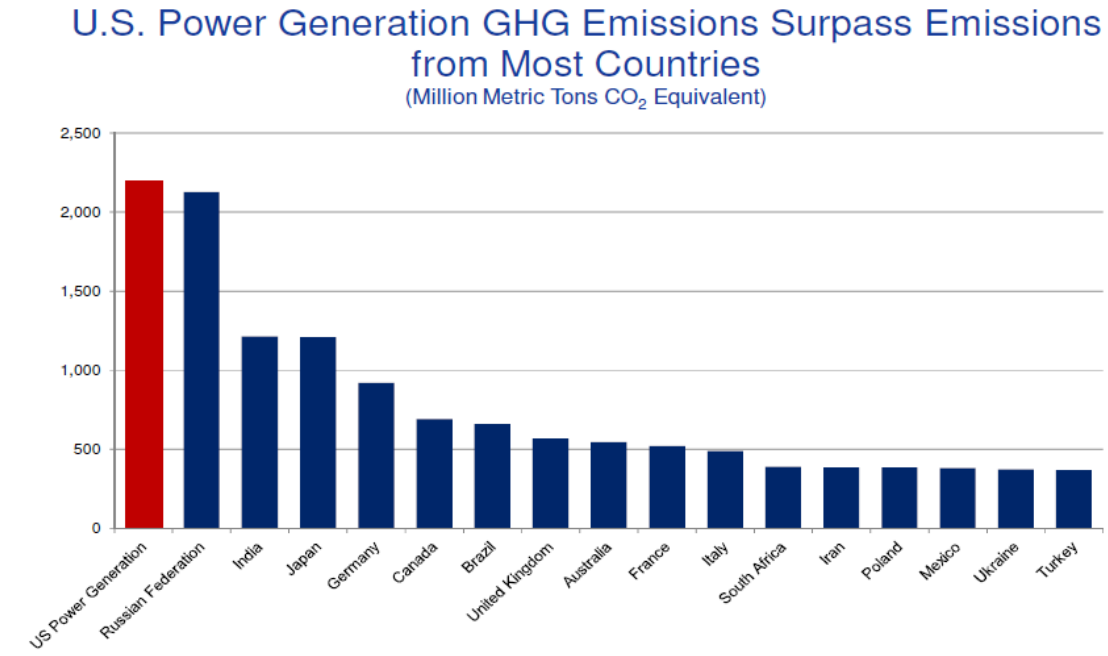
Background
Climate change presents a clear and present danger now to the U.S. and to the world. The National Oceanic and Atmospheric Administration recently announced that the U.S. completed the single warmest 12-month period on record.[i] Over the May 2011 to April 2012 period all of the Mid-Atlantic states experienced record warm or much above normal temperatures.[ii]

Left unchecked, climate change will have severe impacts on Americans' health, our environment, and our economy. The U.S. Global Change Research Program has determined that if carbon pollution is not reduced, it is likely that American communities will experience increasingly severe climate impacts, including: rising levels of dangerous smog in cities—which will lead to an increased risk of respiratory infections, more asthma attacks, and more premature deaths; increased risk of illness and death due to extreme heat; more intense hurricanes and storm surges; increased frequency and severity of flooding; increases in insect pests and in the prevalence of diseases transmitted by food, water, and insects; reduced precipitation and runoff

in the arid West; reduced crop yields and livestock productivity; and more wildfires and increasingly frequent and severe droughts in some regions.[iii]

Greenhouse Gas Burden from the U.S. Power Sector

U.S. power plants fueled by coal and gas are the single largest source of carbon pollution in our nation and one of the largest emitters of climate-destabilizing pollution in the world. The U.S. power sector is responsible for approximately 40% of all carbon pollution in the U.S and emits more GHGs than Russia, India, Japan, or Germany.[iv] Building just one inefficient, emission-intensive plant today locks us into millions of tons of future climate pollution—or the expensive after-the-fact shuttering of built infrastructure that releases harmful pollution. We cannot effectively address climate-destabilizing emissions without addressing the pollution emitted by the power sector.



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).

Innovative Approaches

Fortunately, our nation has the innovative solutions and the know-how to meet this pressing challenge while strengthening our economy. Numerous states across the U.S. are already limiting carbon pollution from new coal plants, like Minnesota, Montana, and New York. Ten leaders of state environmental agencies also recently wrote to EPA expressing their support for the standard, including Connecticut, Delaware, Maryland, Massachusetts, Rhode Island, Vermont, and the District of Columbia.[v] Furthermore, over two dozen states have policies in place to harness the economic and environmental benefits of cleaner energy. Twenty-four states have standards in place that will drive investment in energy efficiency, saving American homes and businesses money while reducing emissions. Many other states have developed policies to support innovation in clean, sustainable energy and to make their economies more efficient.

Despite rhetoric from some in the fossil fuel and utility industry that EPA's common-sense proposal will eliminate new coal-fired power plant construction, the fact is that market forces are already driving utilities to develop cleaner technologies. A recent World Resources Institute analysis explains that "market forces [such] as lower natural gas prices, declining growth in electricity demand, rising coal prices, and increased cost-competitiveness of renewables" are strongly influencing business decisions.[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 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."

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 and the time has come when we can no longer afford to build new, uncontrolled coal plants that discharge vast volumes of GHG pollution for fifty years or more, recklessly imperiling our health, our environment and our prosperity. EPA's proposed limits on GHG pollution from fossil fuel power plants are essential to address climate change, to unleash America's clean energy solutions and to ensure a steady flow of cost-effective and cleaner electricity to power our economy and protect the health and well-being of Americans, now and in the future.

EDF will also be submitting further technical comments on the proposed rule. Thank you again for the opportunity to testify. I am happy to answer any questions you may have.

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[i] National Oceanic and Atmospheric Administration, http://www.ncdc.noaa.gov/sotc/national/2012/4, (accessed May 14, 2012).

[ii] National Oceanic and Atmospheric Administration, http://www.ncdc.noaa.gov/temp-and-precip/maps.php?ts=12&year=2012&month=4&imgs[]=Statewidetrank&submitted=Submit, (accessed May 14, 2012).

[iii] U.S. Global Change Research Program, http://www.globalchange.gov/.

[iv] 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).

[v] Letter to Administrator Lisa Jackson, *Re: Standards of Performance for Greenhouse Gas Emissions for New Stationary Sources: Electric Utility Generating Units*, May 9, 2012.

[vi] World Resources Institute, Fact Sheet, "U.S. ELECTRICITY MARKETS INCREASINGLY FAVOR ALTERNATIVES TO COAL."