

March 10, 2014

EPA Docket Center
U.S. Environmental Protection Agency
Mail Code 2822T
1200 Pennsylvania Avenue NW
Washington, DC 20460

RE: Docket ID No. EPA-HQ-OAR-2013-0495, “Standards of Performance for Greenhouse Gas Emissions from New Stationary Sources: Electric Utility Generating Units”

Dear Administrator McCarthy:

As the Executive Committee of the Energy Producing States Coalition (EPSC), we appreciate the opportunity to provide comments on the Environmental Protection Agency (EPA) proposed rule on “Standards of Performance for Greenhouse Gas Emissions from New Stationary Sources for Electric Utility Generating Units.”

EPSC opposes the expansion of EPA authority to regulate greenhouse gas (GHG) emissions. EPSC members support clean air and environmental protection for the benefit of all Americans today and tomorrow. Furthermore, we strongly support a diversified energy mix that evolves with an “all-of- the-above” energy strategy. This proposed rule promotes an “all-but-one” approach that restricts the future use of coal to generate affordable electricity. By limiting the further utilization of coal-fired electricity, the proposed rule could cause economic harm to the families and businesses in our districts.

EPA’s emission guidelines must be based on emissions standards that can be cost-effectively achieved while maintaining our current energy mix. Under the proposed rule, CO₂ emissions would be limited to 1,100 pounds per megawatt hour (lbs/MWH) for new coal-fired power plants. In order to meet this standard, a system of carbon capture and sequestration (CCS) must be installed for coal facilities. Currently, the average emissions rate for the existing coal fleet is about 2,200 lbs/MWH. As demonstrated by the new American Electric Power Turk Plant in Arkansas, newer, ultra-supercritical pulverized coal plants can achieve CO₂ emission rates that are 30 percent lower than average for the existing fleet. However, these advanced coal-fired facilities would not currently be able to comply with the proposed standard. CCS remains the only viable way to operate a new coal plant under the proposed standard.

Given that CCS remains technically and economically infeasible on a large scale, the likelihood that industry will construct any new coal-fired power plants remains highly uncertain for the foreseeable future. The Edison Electric Institute estimated that 63 gigawatts of coal-fired power will be retired between 2010 and 2022 due to regulatory, market and other factors. This represented 18.5 percent of America’s generating capacity in 2010. EPA’s forthcoming proposed

rule on GHG standards for existing power plants may accelerate these closures and require additional plants to close prematurely. Without the ability to construct economically new coal plants to account for the closure of existing plants, the proposed rule will have a long-term impact on our energy mix.

The United States utilizes a variety of fuels to generate electricity – coal, natural gas, nuclear, hydropower, wind, solar, biomass and other renewables. By relying on a diversity of fuels, as well as energy efficiency, American consumers and the U.S. economy are less susceptible to price shocks and market disruptions. Our current energy mix has allowed utilities to supply affordable, baseload electricity to customers, mostly through coal-fired and nuclear facilities, while also advancing lower carbon electricity through renewables and natural gas. Any precipitous move away from this balanced mix could have serious repercussions for the affordability and reliability of our electricity.

In closing, EPSC strongly urges the EPA to abandon the rule and instead work with states to determine a more economically feasible means of reducing carbon emissions without eliminating or limiting one energy source. Coal remains a critical part of our energy mix. With abundant supplies of domestic coal, this resource has also played a pivotal role in reducing our reliance on overseas energy. Regulations need to be balanced based upon environmental benefit and economic impact as well as clear scientific evidence, not theory and unproven science.

We appreciate the consideration of these comments, and we look forward to continuing to comment on EPA actions regarding GHG emissions.

Sincerely,



Representative Roger Barrus
Utah Legislature
Chairman, EPSC



Speaker Thomas Lubneau
Wyoming Legislature
Immediate Past Chairman, EPSC



Senator Cathy Giessel
Alaska Legislature
Chairman-Elect, EPSC