



Formal Comments Submitted to:

**U.S. Environmental Protection Agency
Listening Session: November 7, 2013**

RE: Proposal to Limit Carbon Emissions from Existing Coal-Fired Power Plants

My name is Felice Stadler and I'm the senior director of National Wildlife Federation's climate and energy program.

For over 75 years we have been advocating for solutions to our nation's largest conservation challenges. And for the past decade, National Wildlife Federation (with its 4 million members and supporters, and 47 states affiliates) has been on the front lines of documenting the profound impact of climate change on our natural resources, and the people and wildlife that depend on them. We have been on the cusp of turning the tide on the climate crisis, being stalwart advocates for a future that embraces clean energy to power our homes and cars, and where wildlife and our lands are protected from carbon-intensive energy sources. To be successful in addressing the climate crisis, however, we have a long road ahead.

Climate science underscores the urgency of tackling the major sources of climate disrupting pollution. So we applaud the Administration for their plan and schedule to curb carbon pollution from the nation's largest source: coal fired power plants.

We know that this rule will face great scrutiny and likely political interference along the way. So we urge you to remain steadfast, and put forth a proposal by next June that gets us on the right path with this rulemaking.

We have heard that the EPA is contemplating issuing "guidance" in June. But in order to ensure that we have a good framework from which to work, we urge EPA to issue more than just guidance, for that implies a level of vaguery that could result in delaying the rule process, which as we know is on a tight timeframe.

NWF has developed 4 principles that we ask EPA to consider as staff prepare to write the rule:

First: In order to be successful in meeting our international commitment of a 17% carbon reduction target by 2020, we need to set standards that will cut emissions from existing coal-fired power plants by at least 35% from 2005 levels. We know that achieving this level of reduction is possible if the EPA pushes compliance strategies that tap readily-available solutions.

Two: The rule should provide specific incentives to allow states to meet the standard through state renewable energy and energy efficiency programs, rather than incentivizing expansion of other fossil fuels like natural gas that have greenhouse gas implications. There is real concern that this rule will be structured in such a way that will lead to a rush to gas, so it's critical to head this off.

Many states already are investing in renewable energy programs, and this rule can do much to continue this important trend. Just this week, a new study led by PJM confirms that wind energy is drastically decreasing both the price of electricity and emissions of harmful pollutants. Carbon emissions are going down, and the lights are staying on. This is a success story that EPA's rule can enhance.

We also know that energy efficiency is one of the most cost effective means of reducing carbon emissions, saving the consumer anywhere from 10-30% on their monthly energy bill. Keeping electricity affordable for the millions of low and fixed income customers who spend a disproportionate share of their income on electricity costs needs to be a priority of this Administration.

Three: Work closely with states to determine the feasibility of states tapping into regional greenhouse gas reduction programs, to drive down overall carbon emissions from the coal-powered utility fleet. Two regional programs are already in place, so there's no need to reinvent the wheel.

Fourth: With any rule that will work to strike a balance between on-site controls and flexible compliance measures, having consistent monitoring, reporting, and enforcement mechanisms will be critical. Carbon reductions need to be quantifiable and verifiable so that each state can be held accountable.

We thank you for this opportunity today, and look forward to working closely with the Administration over the coming year to put forth a strong defensible carbon rule.

Contact:

Felice Stadler
National Wildlife Federation
202-797-6692; stadler@nwf.org