

BCSE Comments for EPA Public Hearing on Carbon Dioxide Limit from New Power Plants

Thank you for the opportunity to participate in this public hearing on the Environmental Protection Agency's carbon dioxide emissions limit for new power plants. My name is Zoe Berkery and I am a Policy Associate with the Business Council for Sustainable Energy.

The Business Council for Sustainable Energy is a coalition of companies and trade associations from the energy efficiency, natural gas and renewable energy sectors, and also includes independent electric power producers, investor-owned utilities, public power, commercial end-users and environmental and energy market service providers.

Founded in 1992, the Council advocates for policies at the state, national and international levels that increase the use of commercially-available clean energy technologies, products and services. The coalition's diverse business membership is united around the revitalization of the economy and the creation of a secure and sustainable energy future for America.

BCSE applauds the EPA's release of revised standards for carbon emissions from new sources under section 111(b) of the Clean Air Act. Clean energy technologies in the energy efficiency, renewable energy and natural gas sectors offer commercially-available options to reduce emissions.

Clarity from EPA on standards for power plant emissions will help inform investment decisions in the power sector. EPA's carbon standards will send signals to the market to utilize a broad portfolio of clean energy technologies and will lead to job creation in these sectors.

BCSE believes it is important to note the revised carbon rules for new power plants continue to utilize output-based standards, which is critical to spur investment in energy efficiency and clean generation in the power sector. The Council strongly supports output-based standards and commends EPA for adopting this approach in the revised new source carbon rule.

In addition, a look back at the last five years shows that clean energy sources are contributing to reductions in US greenhouse gas emissions. Energy efficiency, renewable energy and natural gas are mainly responsible for the nearly 10 percent decline in U.S. greenhouse gas emissions since 2005, taking the country more than halfway to President Obama's goal of achieving a 17 percent reduction in emissions by 2020.

As such, in regards to EPA's pending rule on the regulation of carbon from existing sources BCSE recommends that energy efficiency (including combined heat and power, waste heat to power, and utilization of waste heat recovery), the full set of renewable energy options, as well as natural gas and propane be made eligible as compliance options under the EPA guidelines for limiting carbon dioxide (CO₂) emissions from existing power plants.

Not only will the use of these technologies help to reduce emissions and serve as cost-effective compliance options, they will also help grow the economy, create jobs and strengthen our energy system through its diversification.

Thank you so much for your time.