



December 4, 2015

The Honorable Gina McCarthy
Administrator
United States Environmental Protection Agency
1200 Pennsylvania Avenue, NW
Washington, DC 20460

Re: Environmental Protection Agency's Proposed Rule for Oil and Natural Gas Sector: Emission Standards for New and Modified Sources, 80 Fed. Reg 56,593 (September 18, 2015)

Docket Number: EPA-HQ-OAR-2010-0505 FRL-9929-75-OAR

Dear Administrator McCarthy:

I am writing on behalf of the Business Council for Sustainable Energy regarding the Environmental Protection Agency's proposed rule for emission standards for new and modified sources in the oil and natural gas sectors.

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, publicly-owned utilities, and commercial end-users. Founded in 1992, the Council advocates for policies that expand 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 reliable energy future for America. Of note, as a diverse business coalition, not all members take a position or endorse the views in this letter.

Clean energy technologies, such as natural gas, renewable energy, energy efficiency and greenhouse gas emission offsets, are essential to U.S. environmental objectives under the EPA's Clean Power Plan and the Administration's Climate Action Plan and are essential to U.S. economic growth. Policies must be balanced, optimizing our energy mix and flexible compliance alternatives, in order to achieve these complementary objectives. As new considerations are contemplated as part of the EPA's proposed rule, BCSE encourages the EPA to keep in mind the important role natural gas plays in reducing greenhouse gas emissions and that a cleaner, reliable and more diverse energy system, depends on the ability of energy projects to access readily available natural gas.

Today's energy mix in the United States is radically different from that of a generation ago. The 2015 edition of the *Sustainable Energy in America Factbook* – produced for the Business Council for Sustainable Energy by Bloomberg New Energy Finance – documents this shift and demonstrates how energy efficiency, renewable energy and natural gas are contributing to the country's move towards cleaner energy production and more efficient energy usage. Findings from the 2015 *Factbook* include:

- Natural gas and renewable energy provided over 40 percent of U.S. electricity generation in 2014.
- 93% of new power capacity built in the U.S. since 2000 has come from natural gas and renewable energy; natural gas-fired power plants provided 27% of U.S. electricity in 2014 up from 22% in 2007.

- Natural gas production rose 25% between 2007 and 2014.
- Total energy use fell 2.4% between 2007 and 2014, while the gross domestic product grew by 8%.
- U.S. carbon emissions from the energy sector dropped 9% between 2007 and 2014.

The *Factbook* notes the complimentary relationship between natural gas and renewables, as natural gas-fired electricity generation can quickly ramp up or down to meet changes in demand, and can complement the integration of variable energy resources. This relationship is one way in which generators and grid operators are meeting the electricity needs of the country. For a complete copy of the *Factbook* please visit the Council's [website](#).

As the clean energy trend has taken shape, the U.S. economy has been healthy and the prospects are bright. But stable and balanced policies that recognize the contribution of natural gas, renewables and efficiency are critical for continued growth in the power generation and industrial sectors.

The Business Council for Sustainable Energy looks forward to working with you to develop a final rule that ensures a viable path forward toward a cleaner environment.

Sincerely,



Lisa Jacobson, President
Business Council for Sustainable Energy