

**Business Council for Sustainable Energy Comments in Response
to the Environmental Protection Agency's Proposed Recission to the Rule Reconsideration of the
2009 Endangerment Finding and Greenhouse Gas Vehicle Standards
Docket No. EPA-HQ-OAR-2025-0194**

September 22, 2025

The Business Council for Sustainable Energy (BCSE) appreciates the opportunity to provide comments in response to the Environmental Protection Agency's (EPA) Proposed Recission to the Rule Reconsideration of the 2009 Endangerment Finding and Greenhouse Gas Vehicle Standards (Docket No. EPA-HQ-OAR-2025-0194).

The Council has provided comments to EPA on numerous air quality and climate change initiatives since its founding in 1992. With regard to reducing greenhouse gas emissions (GHG), the Council supports market-based, economy-wide approaches that utilize performance-based metrics and that provide flexibility to states and regulated facilities to implement emission reduction limits.

BCSE supports the Trump Administration's to ensure that Americans have access to clean air, while maintaining U.S. energy independence and reducing energy costs for families and businesses.

Practical and effective emission reduction is both technologically and economically feasible, given the availability and cost-effectiveness of the broad portfolio of supply-side and demand-side energy technologies and is urgently necessary to deliver on the Trump Administration's goals of creating the highest quality of life, and build the safest, healthiest, and most vital communities anywhere in the world. Further, expanding this portfolio of energy resources will create U.S. jobs and maintain the U.S. leader in artificial intelligence (AI).

BCSE represents the portfolio of commercially available resources, technologies, and services that are proven to reduce air pollution and GHG emissions in an affordable and reliable manner. Used to their full potential in a regulatory regime, these solutions are key to successful emissions reductions and air quality improvements – while also achieving the energy dominance goals of the Trump Administration.

BCSE has long supported a federal, economy-wide approach to reducing GHG emissions. Sharp declines in U.S. power sector emissions over the past decade have demonstrated that there are many cost-effective technologies readily available to reduce emissions.

According to the *2025 Sustainable Energy in America Factbook*,¹ power sector emissions are 41 percent below 2005 levels. While the Council urges federal legislative action to ensure durable policy for the long-term, it believes that EPA has an obligation to respond to sound science and court mandates, and to provide business certainty to enable energy sector planning and investment which impact assets with a useful life of multiple decades.

In this submission, BCSE provides information on recent power sector trends and general perspectives on proposal. BCSE is a diverse multi-industry coalition. As such, not all members take positions or endorse the recommendations in these comments.

¹ See: www.bcse.org/factbook, Released February 20, 2025.

U.S. Energy Expansion and Load Growth

Energy growth has returned to the US power system. According to the *2025 Sustainable Energy in America Factbook*,² between 2009 and 2024, the compound annual growth rate for electricity sales in the country was 0.6%, or roughly flat. This changed in 2024, with rapidly rising expectations of power demand from new industrial sources and transportation, onshoring of American manufacturing, and a burst of new data centers planned by tech companies in the race for artificial intelligence dominance.

These expectations, coupled with an increasing number of electricity markets facing capacity constraints, have changed the focus of U.S. energy system planning. Regulators, utilities and energy providers alike are looking to bring new sources of power online quickly and are calling on an increasingly diverse mix of energy resources to meet these needs.

Power Sector Emissions Trends

Clean energy and energy efficiency sectors have proven that they can play a strong role in reducing air pollution and reducing GHG emissions, while also supporting economic development and creating jobs. The findings of the *2025 Sustainable Energy in America Factbook*³ show that total U.S. greenhouse gas emissions are 15.8 percent below 2005 levels, reflecting a decline from pre-pandemic levels (2019). Further, U.S. power sector emissions have declined steadily over the past decade, ending 2024 at 41% below their 2005 peak. U.S. energy productivity has increased 29.3% over the past decade, in large part due to investments in energy efficiency. Additionally, clean energy supports over 3 million American jobs. These statistics show that clean energy and energy efficiency are playing a meaningful role in emissions reductions and must be allowed to continue to do so.

The Council encourages EPA to recognize and consider recent market trends that include the falling costs and increased deployment of low and zero-carbon technologies. Regulation should provide clear and sustained market signals that spur emissions reductions through investment in the full portfolio of energy technologies. U.S. states, cities, businesses and households have been making investment decisions based on these trends and seek regulatory certainty, based on clear and durable federal policies.

General Perspectives on the Proposal

The energy sector is making significant investments to meet increased demand and to ensure that American families have a healthy and high quality of life and businesses remain robust. Affordability and reliability are paramount. Energy assets are long-lived assets and are critical to our nation's economic competitiveness and security. Such investments rely on stable and consistent regulatory frameworks to raise capital. Further, regulatory certainty will enable more accurate and efficient planning and will help to shield consumers from increased costs due to unanticipated regulatory changes.

BCSE urges EPA to issue final rules that will afford legal and policy certainty to the energy sector. This will enable the energy sector to continue to invest to meet growing energy demand in an affordable manner. At a time when the U.S. is facing significant load growth, EPA should provide the federal policy landscape that is supportive of business planning, investment, and managing supply chains.

² See: www.bcse.org/factbook, Released February 20, 2025.

³ See: www.bcse.org/factbook, Released February 20, 2025.

Thank you for the opportunity to share BCSE's views on this proposal. Should you wish to discuss these comments further, please contact BCSE President Lisa Jacobson via email at ljacobson@bcse.org.