





Sustainability is the bottom line.

8 August 2023

Electronic Submission

Michael Regan, Administrator
U.S. Environmental Protection Agency (EPA)
Office of the Administrator, Mail Code 1101A
1200 Pennsylvania Ave., NW
Washington, DC 20460

Re: New Source Performance Standards for Greenhouse Gas Emissions from New, Modified, and Reconstructed Electric Utility Generating Units; EPA-HQ-OAR-2023-0072

Dear Administrator Regan,

We are a diverse group of leading U.S. job creators, investors, innovators, manufacturers, and power purchasers. We are located in communities across the country and represent sectors across the economy, with 269,790 employees and approximately \$147.2 billion in annual revenue / \$17,885 billion in AUM.

We would like to thank you and the experts and staff at the U.S. Environmental Protection Agency (EPA) for your leadership in proposing ambitious actions to addressing greenhouse gas (GHG) emissions from fossil fuel-fired power plants under the EPA's strong authority in sections 111(b) and (d) of the Clean Air Act, and for the opportunity to comment on these important rules.

As the costs of the climate crisis and the cost-effectiveness of clean energy have each become increasingly clear, so too has the need for a more rapid transition in the power sector towards affordable, reliable American-made decarbonized energy. The power sector accounts for 25% of U.S. GHG [emissions](#), with power plants representing the second biggest source of GHG emissions nationwide. Reducing GHG emissions will also lower other air pollutants such as particulate matter, sulfur dioxide, and nitrogen oxide. As a result, the proposed rules will result in [\\$85 billion](#) in net climate and health benefits, while preventing 1,300 premature deaths and over 300,000 cases of asthma attacks by 2030..

As the Inflation Reduction Act (IRA) and Infrastructure Investment and Jobs Act (IIJA) provide crucial investments in American innovation, manufacturing, and deployment of cost-reducing clean energy technologies, EPA's proposed standards are another important step in the right direction. Moreover, these standards are achievable and will provide the clarity and certainty that the economy — and that we as major power sector customers and investors — need.

In order to fully leverage the IRA and IIJA's cost-reducing investments and maximize these rules' public health and GHG emissions reductions benefits, we urge the EPA to consider the following recommendations for strengthening its proposal as it works to quickly finalize the most effective standards possible:

- 1) Expand the scope of coverage for affected power plants (and emissions reductions) by lowering capacity and runtime thresholds.
- 2) Fully leverage IRA and IIJA investments that make currently available technologies even more cost-effective by accelerating compliance schedules/deadlines.



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- 3) Ensuring active, accessible community engagement throughout implementation, including utility compliance with carbon capture or hydrogen.

We are committed to reducing our corporate GHG emissions to protect the health of the American people and economy in the face of climate change and its risks to our economy, businesses, supply chains, employees, customers, and communities, and are united in our desire to advance smart public policy that supports our efforts and accelerates the transition to an America-led clean energy future. The historic investments in the IRA have reduced costs for businesses to accelerate meeting their clean energy goals, as well as for states and utilities to comply with these standards. We are already seizing the growing opportunities to transition to affordable, reliable American-made clean energy and maximize savings from energy efficiency. Strong 111(b) and (d) standards will put our goals within reach.

We urge EPA to consider strengthening these standards to the maximum extent feasible and to finalize strong 111(b) and (d) standards by March 2024. This will ensure our ability to achieve our emissions reduction goals and fully leverage the reduced costs and accelerated deployment of clean energy technology from the IRA, IJJA, and other investments in America. These standards will help strengthen our economy and that the United States' global leadership in clean energy leadership is solidified. We look forward to continuing to engage with EPA on this issue and working together to advance these standards and the many benefits they will bring.

Sincerely,

Alterra Mountain Company

Amy's Kitchen

Arapahoe Basin Ski Area

Aspen Skiing Company

Avocado Green Brands

Blue & Green Planet, Ltd

Boyne Resorts

Bridger Bowl Ski Area

Climate Positive Consulting

computers dot mom

Contempl8 T-Shirts LLC

Danone North America

ECOS

Eileen Fisher, Inc.

HASI

Littorai Wines

Michigan Snowsports Industries Association

Miller/Howard Investments, Inc.

National Ski Areas Association

New Belgium Brewing

Progressive Investment Management

Region VI Coalition for Responsible Investment

Scenario International LLC

Sierra Nevada Brewing Co.

Sisters of the Humility of Mary

Ski California

Ski New Hampshire

Soletrac, Inc.

Sustainable Food Policy Alliance

Vail Resorts

Wisp Resort