

## Public Comments on EPA GHG Standards for New and Existing Power Plants

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Hi, I'm Dan Bakal, Senior Program Director of Climate and Energy at Ceres. Ceres is a nonprofit organization working with businesses and investors to solve the world's greatest sustainability challenges. First, we would thank the EPA for its proposed updates to the GHG Standards for Fossil Fuel Power Plants. The climate crisis continues to unfold before us and necessitates a significant transition of the power sector toward clean energy. These standards for new and existing power plants are an important step in the right direction. In order to maximize public health benefits and meaningfully curb greenhouse gas (GHG) emissions, we urge the EPA to move forward with these standards quickly and consider strengthening them in three key areas: (1) expanding affected power plants, (2) accelerating compliance schedules, and (3) upholding environmental justice by ensuring community input throughout their implementation.

Ceres works with leading companies across several industry sectors who are united to advance effective climate policy and spur the transition to a just and inclusive clean energy economy. Most of the companies we engage with have already committed to reducing their corporate GHG emissions to protect the health of the American public and safeguard the nation's economic well-being in the face of climate change.

Companies across a multitude of sectors are making commitments to reduce their emissions and promote a sustainable path forward for people and the economy, and they need strong policies to support their efforts. Ceres feels strongly that the EPA's proposed standards are achievable and will provide clarity that the electric power sector needs.

The power sector makes up [25% of U.S. carbon emissions](#), with power plants being the [second biggest source](#) of GHG emissions nationwide. Reducing these greenhouse gas emissions will also lower other air pollutants such as [particulate matter](#), sulfur dioxide, and nitrogen oxide. As such, the proposed standards will result in [\\$85 billion](#) in net climate and health benefits, and [prevent 1,300 premature deaths](#) and over 300,000 cases of asthma attacks by 2030. These standards, once finalized, can greatly improve the quality of people's lives. We believe there are additional opportunities to increase these benefits further.

As it stands, the proposed standards address [only the largest baseload plants](#) with a 300MW capacity limit that run for over 50% of the year. We urge the EPA to consider thresholds as low as 100MW, which would cover 78% of 2035 gas generation as compared to 23% under the 300MW capacity limit according to the [EPA's own analysis](#). Lowering the proposed capacity factor limit from 50 to 40% would also significantly increase coverage from 29% to 84% of 2022 emissions from gas plants respectively.

The currently proposed deadlines for compliance with these rules are 2030, 2035, or later. New gas plants would not be required to make significant reductions to carbon pollution until 2035. This deadline does not take full advantage of currently available technologies that new plants are in the best position to adopt before coming online. We would like to encourage the EPA to consider earlier deadlines for new gas plants. Full compliance for existing coal plants would not be required until 2035, and we encourage the EPA to consider earlier compliance timelines.

Finally, to truly protect and improve public health, the EPA must actively seek out and incorporate community input in every step of the implementation process. Communities that will be affected by these

rules must have the opportunity to engage and provide feedback in how power plants should comply—especially if utilities or states wish to use carbon capture or hydrogen to meet these standards.

The historic investments in the Inflation Reduction Act (IRA) have reduced costs for businesses to accelerate their ability to meet their clean energy and clean transportation goals. Companies are already seizing the opportunities to transition to affordable American-made clean energy, maximize savings from energy efficiency, and grow their electric vehicle fleets.

We urge the EPA to consider strengthening the standards to the maximum extent feasible to ensure that we are able to achieve our emission reduction goals. These standards will help strengthen our economy and ensure that the United States remains a global leader in clean energy. We look forward to engaging with the EPA on this issue and working together to advance these standards.