

UNITED STATES CLIMATE ALLIANCE

The Honorable Michael S. Regan, Administrator
U.S. Environmental Protection Agency
1200 Pennsylvania Avenue, NW
Washington, DC 20004

June 6, 2022

Docket ID No. EPA-HQ-OAR-2022-0289

Dear Administrator Regan,

I write as the Executive Director of the U.S. Climate Alliance (Alliance) – a bipartisan coalition of governors committed to climate action that together represent approximately 60 percent of the U.S. economy and 55 percent of the U.S. population – in response to the U.S. Environmental Protection Agency’s (EPA) *Reducing Climate Pollution from New Gas-Fired Turbines* draft whitepaper. The Alliance would like to thank the EPA for providing this resource and inviting dialogue on how these mitigation technologies can support a range of state and federal programs and efforts to reduce emissions from the electricity sector.

The Alliance, which includes 24 member states, is committed to doing its part by reducing collective net greenhouse gas (GHG) emissions at least 26-28 percent by 2025 and 50-52 percent by 2030, both below 2005 levels, and collectively achieving overall net-zero GHG emissions as soon as practicable, and no later than 2050. These targets build on the 15 percent collective reduction in GHG emissions below 2005 levels members achieved between 2005 and 2019. Notably, 81 percent of these economy-wide reductions came from the electricity sector. In 2019, Alliance members’ electricity generation mix accounted for 50 percent less coal and 50 percent more zero-carbon sources than non-Alliance states.

This progress is intentional and reflects the policy pathways and programs Alliance members have developed to decarbonize the electricity grid. In fact, fourteen members have economy-wide net-zero emissions goals, twenty-one have renewable and clean energy standards for electricity, and eighteen have 100 percent zero-carbon or carbon-neutral electricity targets through statute or executive order. Accelerating policies to reduce GHG pollution and promote clean energy deployment is critical to attaining our collective goals and ensuring a clean, affordable, and reliable grid. Additionally, the decarbonization of transportation, buildings, and industry is heavily reliant on rapid emissions reductions in the electricity sector to support increased electrification. This energy transition must also improve public health, prioritize equitable outcomes, drive economic growth and employment, and help secure energy independence with clean technologies.

Despite progress within the electricity sector, the U.S. still has a long way to go. The Energy Information Administration’s (EIA) 2022 Annual Energy Outlook, forecasts that fossil-fuel powered generation in the U.S. will only decrease from 60 to 44 percent by 2050 in the reference case. New gas-fired generation over that same period is forecasted at 39 percent of new capacity.¹ Achieving net-zero carbon emissions from the electricity sector consistent with the U.S. Nationally Determined Contribution² and the National Long-term Strategy³ requires sustained state-federal cooperation to ensure the transition of existing polluting power plants, reduce risk of future stranded assets, and expedite the growth of clean energy to meet demand.

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The EPA has an obligation to regulate carbon dioxide as a GHG pollutant that endangers public health and welfare. While the whitepaper does not expressly establish policy, it describes a variety of control measures that could be successfully constructed and operated at gas-fired electric generating units to comply with state and federal programs. Alliance members support the issuance of federal regulations that provide long-term regulatory certainty for industry while establishing a stringent federal floor, rooted in the advances in emission control technologies. The nation needs holistic approaches to regulating carbon dioxide emissions including the development of a New Source Performance Standard for gas-fired electric generating units and regulations to further address emissions from existing power plants. Such regulations are critical to states' ability to achieve their GHG targets, while supporting transitioning industries and protecting electricity customers.

We ask for your continued engagement and partnership with states to ensure the country can achieve a decarbonization pathway consistent with the science and the cooperative federalism approach at the heart of the Clean Air Act. Whenever possible, we encourage flexible compliance pathways aligned with the implementation of existing enforceable state decarbonization policies. States would also benefit from the EPA's technical assistance on evaluating costs and benefits associated with technologies in the whitepaper. EPA should seek to align implementation timelines for any new federal rules to streamline planning and compliance. Lastly, Alliance members support mitigation strategies that prioritize co-benefits, especially for those communities that are disproportionately impacted by local pollutants and other environmental factors.

Thank you again for the opportunity to comment and for the Administration's partnership with states to confront the climate crisis.

Sincerely,



Casey Katims
Executive Director
U.S. Climate Alliance

¹ U.S. Energy Information Administration. Annual Energy Outlook 2022: Narrative, March 2022.

https://www.eia.gov/outlooks/aeo/pdf/AEO2022_Narrative.pdf

² U.S. Department of State. United States' Nationally Determined Contribution, April 21, 2021.

<https://www4.unfccc.int/sites/ndcstaging/PublishedDocuments/United%20States%20of%20America%20First/United%20States%20NDC%20April%2021%202021%20Final.pdf>

³ U.S. Department of State & U.S. Executive Office of the President. The Long-Term Strategy of the United States: Pathways to Net-Zero Greenhouse Gas Emissions by 2050, November 2021. <https://www.whitehouse.gov/wp-content/uploads/2021/10/US-Long-Term-Strategy.pdf>