

Testimony of Bruce Burton before the Environmental Protection Agency regarding the Clean Power Plan

Washington, DC

July 30, 2014

Good morning. My name is Bruce Burton. I am an International Representative with the International Brotherhood of Electrical Workers (IBEW). On behalf of the approximately 750,000 active members and retirees of the IBEW, I thank you for the opportunity to testify. For the following reasons, the IBEW opposes the Clean Power plan as proposed.

EPA reports the Clean Power Plan will lead to the closure of 41 to 49 gigawatts of coal-fired generating capacity by 2020; just six years from now. According to the government's own figures this will result in the loss of 52,000 permanent, direct jobs in the utility, rail, and coal mining sectors. In addition, closing this much coal generation will cost an additional 100,000 indirect jobs.

However, EPA's numbers must be viewed with some suspicion. During the Mercury and Air Toxics Standards rule making process EPA claimed MATS would close only 4.7 gigawatts of coal generation. The IBEW and others told EPA their number was far too rosy and that MATS would close 56 gigawatts of coal. It turned-out we were correct. Experts now confirm that 56 gigawatts of coal generation will be lost by 2016.

Taken together, MATS and the Clean Power Plan will close approximately 40 percent of today's coal fleet. Gone with those plants will be approximately 400,000 American jobs at a time when our nation continues to recover from the worst recession since the Great Depression. Unfortunately, given the IBEW's experience with MATS, these numbers could become far worse.

Closing so much coal so fast threatens the reliability of the nation's electric grid, creating the potential for widespread blackouts and brownouts during periods of peak usage. During the recent Polar Vortex, 90 percent of American Electric Power's coal plants scheduled to close under MATS were used to generate electricity. In addition, PJM, a Regional Transmission Authority (RTO) operating in the mid-central eastern United States, reported came with 700 megawatts of being unable to meet electricity demand. This, during one of the coldest, snowiest, winters on record.

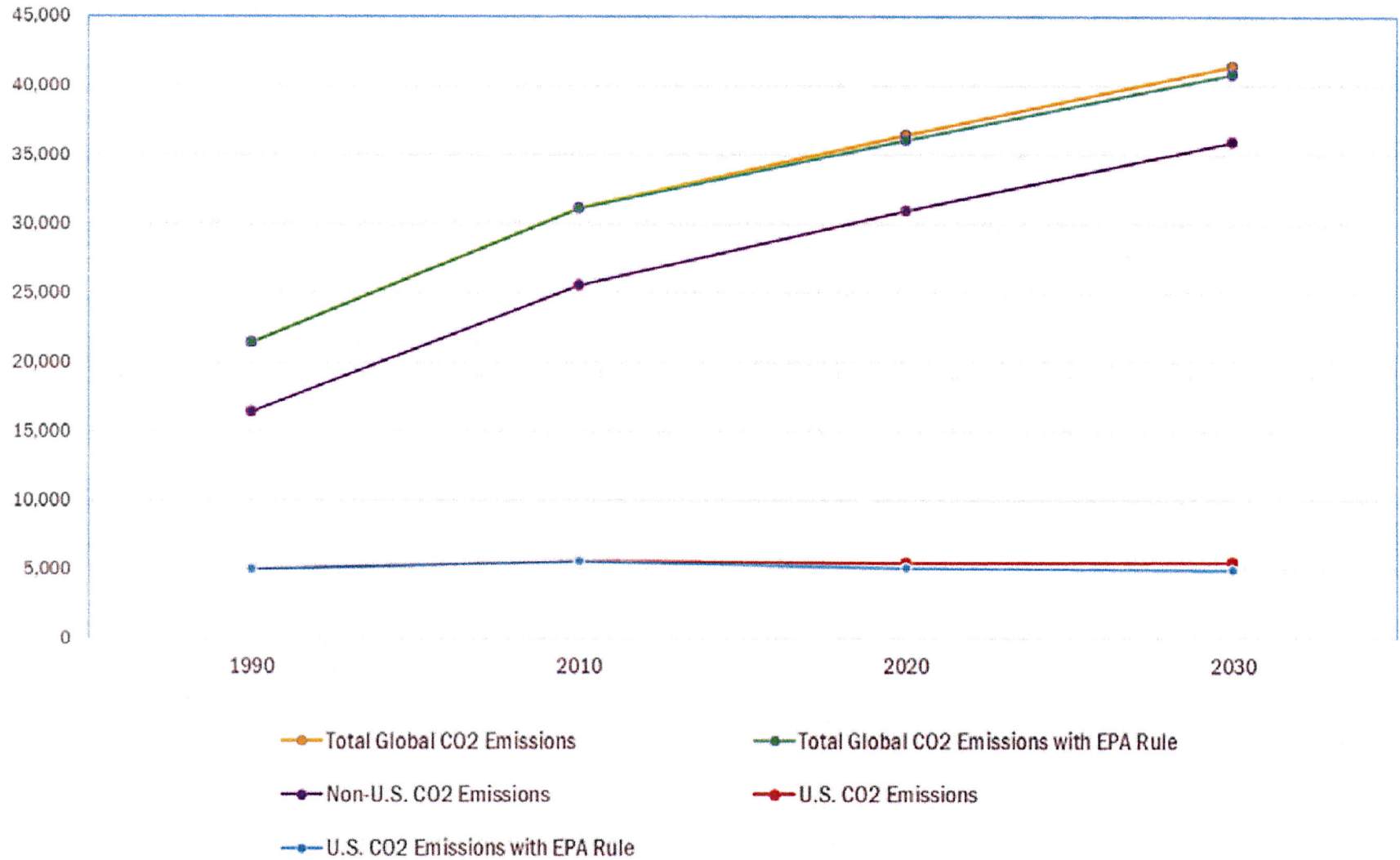
So, for all this pain the Clean Power Plan will certainly cause a large drop in CO2 emissions, correct? The answer is no. In fact, there will be almost no impact on CO2 emissions that contribute to global warming. As the graph included with my testimony illustrates, the problem is not with the United States. U.S. CO2 emissions have been flat since 1990 and are forecast to remain so through the year 2030 – with or without the Clean Power Plan. The problem lies instead with our trading partners. While U.S. emissions have remained flat, CO2

output in the rest of the world has risen approximately 44 percent since 1990; from 16,000 million metric tons annually to approximately 36,000 million metric tons today. Our nation cannot afford to “go it alone” and expect our actions will have any meaningful climate impact in a world that is using more and more coal and other fossil fuels. Unless other nations act, our efforts in the United States will be for naught.

Given a recent Supreme Court decision regarding the greenhouse gas permitting rule, there is reason to believe the Court will take a skeptical view of an overly-expansive interpretation of EPA’s authority to regulate greenhouse gases. With that in mind the IBEW recommends EPA reduce the significant economic impact of the Clean Power Plan by providing credit to states that have already reduced their CO₂ emissions due to market-driven forces such as increased natural gas use, the retirement of older coal plants, and/or the construction of new nuclear generation. The IBEW also recommends a delay in the implementation of the Clean Power Plan in order to give states and utilities adequate time to implement compliance strategies. Finally, though outside the scope of this rulemaking, addressing global climate change in a meaningful way will require the full cooperation of nations like China and India. Absent their commitment, the Clean Power Plan will have no real benefit.

U.S. and Global Carbon Emissions Projections

(million metric tons)



Source: EPA Carbon Regulation Proposal, pg 547-548, and www.eia.gov/forecasts/leo/table21.cfm

Testimony of Dick Wilson before the Environmental Protection Agency regarding the Clean Power Plan

Washington, DC

July 29, 2014

Good morning. My name is Dick Wilson. I am an International Representative with the International Brotherhood of Electrical Workers (IBEW) and a member of Local Union 753 in Springfield, Missouri. On behalf of the approximately 750,000 active members and retirees of the IBEW, I thank you for the opportunity to testify. For the following reasons, the IBEW opposes the Clean Power plan as proposed.

EPA reports within six years, the Clean Power Plan will lead to the closure of 41 to 49 gigawatts of coal-fired generating capacity by 2020. According to the government's own figures this will result in the loss of 52,000 permanent, direct jobs in the utility, rail, and coal mining sectors. In addition, closing this much coal generation will cost an additional 100,000 indirect jobs. That equals 152,000 good paying, middle class jobs, and jobs that are crucial to our nation's economic recovery.

However coming from the "Show Me" state, I believe the EPA's numbers must be viewed with some suspicion. During the Mercury and Air Toxics Standards rule making process EPA claimed MATS would close only 4.7 gigawatts of coal generation. The IBEW and others told EPA their numbers were off base and out of touch, and that MATS would close 56 gigawatts of coal. As it turned-out we were correct. Experts now confirm that 56 gigawatts of coal generation will be lost by 2016.

Taken together, MATS and the Clean Power Plan will close approximately 40 percent of today's coal fleet. Gone with those plants will be approximately 400,000 American jobs at a time when our nation continues to recover from the worst recession since the Great Depression. Unfortunately, given the IBEW's experience with MATS, these numbers could become far worse.

As a former Business Manager, I have seen firsthand the jobs that are created by coal fired power plants and the importance they play in our small towns and communities across the country. In my hometown of Springfield, Missouri having our own base load power supply, which is owned by the municipal utility has been crucial in helping southwest Missouri weather the Great Recession and fare far better than most communities of its size.

According to one of the proposed plans put forth by the EPA under the Clean Power Plan, the City of Springfield, Missouri and its municipal utility, City Utilities of Springfield, would lose close to one-third of its base load generation. This would force the utility and its rate payers to buy power from another source, outside of the community and a source that is in the

business of making a profit, not providing reliable and economical electricity to the rate payers and citizens of the community.

We ask that the EPA take a common sense approach to the rule making process. We ask that EPA not sacrifice our nation's economy and electric reliability by developing a rule that does not take into account current commercially proven and economically viable technology to reduce CO₂, such as the AEP Turk plant. Along with the steps to reduce CO₂ emissions that have already been taken in states due to market driven conditions such as increased natural gas use, retirements of older coal plants, and/or the construction of new nuclear generation. The IBEW recommends a delay in the implementation of the Clean Power Plan until a common sense approach can be developed to reduce CO₂, an approach that will give states and utilities adequate time to develop and implement compliance strategies. In closing, we understand that it is the EPA's responsibility to determine environmental policy and our nation's role in addressing climate change; however we do not believe that it is the EPA's role to set energy or economic policy as this rule clearly does. We believe that the only way to have a meaningful impact on climate change will be to require the full cooperation of nations like China and India, without their participation and commitment this rule will accomplish no measureable results in the global perspective and will only serve to harm our nation's economy and electric reliability.