February 3, 2014

The United States Senate  
Committee on Energy and Natural Resources  
SD-304 Dirksen Senate Office Building  
Washington, DC 20510-6150  

Re: Request for hearings on coal plant retirements

Dear Chairman Wyden and Ranking Member Murkowski:

During promulgation of the Environmental Protection Agency’s (EPAs) Mercury and Air Toxic Standards (MATS) rule, our unions consistently raised concerns regarding the short timeframe available for compliance and the devastating effects on jobs, especially good-paying middle-class employment in the coal-fired electricity generation sector. During the rulemaking process our unions stated for the record that MATS and its short compliance timeline would result in the closing of 56 Gigawatts of coal-fired generation and the loss of approximately 250,000 jobs. Despite assurances by EPA to the contrary, our prediction is now coming to pass.

As the deadline for compliance with MATS approaches, we are increasingly concerned with the effect of a short compliance timeline as hundreds of coal generating units retire and are permanently removed from service. Our concerns are compounded by the reduction in utility revenues from existing generation, increased reliance on demand response, and from unregulated distributed generation. These reduced revenues may increase the number of coal - and possibly nuclear - plant retirements as available income will not justify maintaining and/or retrofitting the remaining plants. Needless to say, the more plants that retire, the more jobs will be lost. In addition, as these plants retire, sufficient generation assets to meet demand become questionable, as witnessed by the astronomical electric price spikes during the recent polar vortex.

With these concerns in mind, we respectfully request the Senate Energy and Natural Resources Committee to hold a hearing on the effects of MATS on the regional transmission organization (RTO) markets and their preparedness for generation retirements in the 2015-2017 timeframe. A hearing would be timely and beneficial. Please contact Jim Hunter, Director IBEW Utility Department, at (202) 728-6065 or via email at hunter@ibew.org if you or your staff would like to discuss these matters further.
Thank you for considering our request and we hope to hear from you soon.

Sincerely,

Newton B. Jones  
International President  
International Brotherhood of Boilermakers, Iron Ship Builders, Blacksmiths, Forgers and Helpers  

Edwin D. Hill  
International President  
International Brotherhood of Electrical Workers  

Robert A. Scardelletti  
International President  
Transportation Communications Union  

Cecil E. Roberts, Jr.  
International President  
United Mine Workers of America  

John Previsich  
President  
SMART Transportation Division  

D. Michael Langford  
International President  
Utility Workers Union of America