



Testimony
EPA's Proposed Rule
"Carbon Pollution Emission Guidelines for Existing Stationary Sources: Electric Utility Generating Units," Docket Number EPA-HQ-OAR-2013-0602

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My name is Graham McCahan and I am an attorney with Environmental Defense Fund (EDF), a non-partisan environmental organization with more than 750,000 members nationwide. For over 25 years, EDF has worked in Colorado and across the Rocky Mountain West to protect human health and the environment from deleterious airborne contaminants.

Thank you for the opportunity to testify today. The proposed Clean Power Plan is a crucial step in the President's Climate Action Plan that will help address the massive quantities of climate destabilizing pollution emitted from U.S. power plants—one of the largest sources of greenhouse gases in the world. EDF strongly supports the proposed Clean Power Plan and urges EPA to strengthen the final standards so that reductions are deeper and achieved more quickly.

Climate Impacts and Risks

The impacts we are seeing now and will experience in the future have substantial economic, human health, and social costs. The *Risky Business* report, a recently completed independent assessment of the economic risks of climate change in the United States, found that climate impacts will generate substantial economic costs due to the damage to and loss of coastal infrastructure and property; the extreme heat impacts on labor productivity, health, and energy systems; and disruption of agricultural production.¹

The stakes are high in Colorado as hotter temperatures, reduced winter snowpacks, and more frequent droughts are expected to decrease Colorado River streamflows.² These changes are

¹ Risky Business Project, *RISKY BUSINESS: The Economic Risks of Climate Change in the United States*, 2014.

² 2014 National Climate Assessment, U.S. Global Change Research Program, available at <http://nca2014.globalchange.gov/report/regions/southwest>.

projected to result in decreased surface water supplies, which will impact the allocation of water resources to major uses, such as agriculture, drinking water, and ecosystem flows.³ Our treasured Rocky Mountain ecosystems are especially susceptible to climate change impacts, and high elevations have already experienced temperature increases at rates three times the global average.⁴ Continued warming threatens critical wildlife habitats and exacerbates the impacts of invasive species and pests, such as the mountain pine beetle.⁵ Increased warming, drought, and insect outbreaks have increased wildfires and impacts to people and ecosystems throughout the West.⁶ Projected temperature increases will increase the threats and costs to public health in our region's cities.⁷

Solutions

Fortunately, the solutions we need to achieve significant reductions of carbon pollution from the power sector are at hand. Colorado has a long history of bi-partisan solutions that have provided a strong foundation for meeting EPA's proposed standards. Under Colorado's bi-partisan Clean Air Clean Jobs Act, bi-partisan renewable energy standards, and bi-partisan energy efficiency policies, Xcel Energy will cut its carbon emissions by 31% from 2005 levels by 2020 by investing in renewable power and energy efficiency and shifting utilization away from high emitting plants. As it has integrated increasing renewables into its generation mix, Xcel's retail electricity rates have never gone above the national average.

The shift to cleaner and safer energy provides public health and other benefits for our communities and families: helping to lift the brown cloud along the Front Range, cutting through the summer smog, and protecting the grand vistas of Colorado's crown jewel—Rocky Mountain National Park.

Strong carbon pollution standards are consistent with a strong clean energy economy in Colorado—from Logan County wind turbines providing revenue and economic security to farmers, to cost savings for Colorado's families from our leading energy efficiency policies. The Clean Power Plan will encourage investors, inventors, and entrepreneurs to find new ways to cut pollution, and give industry flexibility to find the most efficient path to a clean future.

And we know that a transition to clean energy is not only possible, it's affordable. Solar and wind resources are cheaper than ever before. In 2012, rooftop solar panels cost approximately

³ *Ibid.*

⁴ EPA, "Climate Impacts in the Southwest," <http://www.epa.gov/climatechange/impacts-adaptation/southwest.html> (last visited July 28, 2014).

⁵ *Ibid.*

⁶ 2014 National Climate Assessment, U.S. Global Change Research Program, available at <http://nca2014.globalchange.gov/report/regions/southwest>.

⁷ *Ibid.*

one percent of what they did 35 years ago,⁸ and the cost of solar panels fell by 60 percent from 2011 to 2013.⁹ This past May, Xcel Energy announced that it is now acquiring renewable energy at prices that out-compete fossil fuels.¹⁰

By contrast, the costs of inaction are high, with a heavy burden of a changing climate falling on Coloradans. There is strong public support for ensuring that the single largest source of dangerous carbon pollution in our nation is finally subject to enforceable limits, with 64 percent of Americans believing the government should limit greenhouse gas emissions from existing power plants to address climate change and improve public health.¹¹

Conclusion

It is long past time we put national limits on the amount of climate-destabilizing carbon pollution emitted by power plants. Colorado's experience successfully reducing carbon pollution through bi-partisan efforts demonstrates we can transition quickly and cost-effectively to a clean energy economy. Indeed, these standards will not only reduce pollution here at home, but they can help ensure that America will be prosperous in the global economy, exporting clean energy solutions to the rest of the world. Furthermore, these standards enjoy broad support including from health and medical associations, environmental groups, the faith community, businesses, labor, Moms Clean Air Force, and more. Thank you again for the opportunity to testify in support of the Clean Power Plan.

⁸ U.S. Dep't of Energy, *Revolution Now: The Future Arrives for Four Clean Energy Technologies*, at 4 (Sept. 2013), available at <http://energy.gov/sites/prod/files/2013/09/f2/Revolution%20Now%20-%20The%20Future%20Arrives%20for%20Four%20Clean%20Energy%20Technologies.pdf>.

⁹ Ian Clover, *US Solar Power Costs Fall 60% in Just 18 Months*, *pv magazine* (Sept. 20, 2013), http://www.pv-magazine.com/news/details/beitrag/us-solar-power-costs-fall-60-in-just-18-months_100012797/#axzz2qgONDEBG.

¹⁰ See http://www.xcelenergy.com/About_Us/Energy_News/News_Releases/Xcel_Energy_surpasses_national_carbon_emissions_reduction_goal

¹¹ Yale Project on Climate Change Communication, "Americans support CO2 limits on coal-fired power plants," <http://environment.yale.edu/climate-communication/article/americans-support-co2-limits-on-coal-fired-power-plants/> (last visited July 28, 2014).