

Public Listening Session on 111(d) Carbon Pollution Standards For Existing
Power Plants
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Testimony of David McCabe
On behalf of The Clean Air Task Force

My name is David McCabe and I am a Senior Atmospheric Scientist with the Clean Air Task Force. The Clean Air Task Force is an environmental organization focused on catalyzing the development and global deployment of low carbon energy technologies through research, public advocacy leadership, and partnerships with the private sector.

CATF thanks the U.S. Environmental Protection Agency for continuing the process of addressing greenhouse gas emissions from electric generating units and we welcome this opportunity to engage in a dialogue regarding Clean Air Act section 111(d) carbon pollution standards for existing power plants.

Fossil fuel-fired power plants are the country's largest stationary source of greenhouse gases. In 2011, fossil fuel combustion by the existing electric power sector accounted for nearly 40 percent of all of our energy-related carbon dioxide emissions. Deep reductions of these emissions are vital to mitigating the harmful effects of climate change.

Under Clean Air Act section 111(d), EPA is authorized, and indeed charged with, directing the development of emissions standards reflecting the best system of carbon dioxide emission reduction for existing power plants. Substantial reductions in these emissions are necessary to protect public health and the environment, as well as President Obama's commitment to reduce all U.S. greenhouse gas emissions by 17 percent below 2005 levels by 2020. The Agency has considerable authority to do this job right -- to ensure that existing sources of carbon pollution do their share to achieve these needed reductions.

CATF's work has revealed various technically and economically feasible systems of emissions reduction for the power sector that will achieve the

deep reductions of carbon pollution needed from this industry to meet the President's climate goals. However, critics, including witnesses at these public listening sessions, have claimed that a rule on existing power plants must necessarily be exorbitantly expensive for electric ratepayers and ruinous to the economy.

CATF has undertaken a series of analyses to test those claims and found them completely unfounded. With technical help from The NorthBridge Group, CATF has examined ways to achieve meaningful carbon reductions from existing power plants at minimal cost. The reductions can be achieved simply through optimizing the dispatch of existing fossil fuel power plants to rely less on inefficient coal units and more on cleaner, more efficient natural gas units. Our analysis found that such a response to existing source standards could reduce power sector carbon pollution by more than 25 percent from 2005 levels by 2020, while protecting electric ratepayers from increases in their monthly bills.

The Task Force looks forward to sharing these findings in the coming months and to working closely with the Agency as it develops performance standards that significantly reduce carbon pollution from existing power plants.

Thank you.