

**Statement of Benjamin Longstreth,
Senior Attorney, Climate and Clean Air Program
Natural Resources Defense Council
Public Hearing on EPA Proposed Standards of Performance for Greenhouse
Gas Emissions from New Electric Generating Units
February 6, 2014**

Thank you for providing me the opportunity to speak today in support of EPA's proposed standards to limit carbon pollution from power plants. On behalf of NRDC's 1.4 million members and online activists, I commend EPA for undertaking this important rulemaking.

We have an obligation to protect our children, grandchildren, and their children from the harms of climate change. In recognition of this imperative, President Obama committed to achieve, by 2020, a 17 percent reduction in carbon pollution from 2005 levels. Last summer, in the Climate Action Plan, the President charted a path toward this 17 percent reduction goal. The first and most important element of that Plan is setting standards for the carbon pollution from the power plants that are responsible for forty percent of our carbon pollution.

But in order to reach the 17 percent target, it is critical to not just set standards, but to set standards that achieve significant reductions in the level of pollution emitted from new and, even more importantly, existing power plants.

I am going to address the standards EPA has proposed for natural gas-fired combustion turbines. This is an area of the proposed rule that should be significantly strengthened.

EPA proposes to find that natural gas combined cycle plants are the best system of emission reduction for this subcategory. We support this determination. But EPA then fails to properly determine the appropriate level of carbon pollution that such plants can meet.

EPA proposes that for NGCC units above 250 megawatts, the standard should be 1000 lb CO₂ per MWH. For units below 250 megawatts, EPA proposes 1,100 lb CO₂ per megawatt hour.

In selecting these numbers EPA has proposed emission levels that just about every NGCC unit in each size class can meet. This is not adequate. Once EPA determined that NGCC is the best system of emission reduction, EPA must still – as it has for other rules – determine the proper level at which to set the standard based on the range of performance by NGCC plants. EPA's practice in other rules has been to examine the performance of sources using the identified system of emission reduction and set the standard based on what the best plants – typically near the eightieth percentile – can achieve.

For NGCC plants, there is a significant range in performance. In our comments on the April 2012 proposed rule, we presented our analysis of the emission levels of NGCC plants. This showed that there are many 250 megawatt or larger plants that achieve a net emissions rate below 825 and a good number that are below 800. Based on that analysis, we recommended that, for the category of larger plants, EPA adopt a standard in the range of 825 to 850 lbs CO₂/MW. We are in the process of reviewing the data again but thus far we have seen no evidence warranting a weaker standard. There is no reason for EPA to set a standard of 1,000 lbs Co₂/MW when so many plants can achieve substantially better results.

We are also evaluating the data for smaller NGCC plants and believe that EPA's proposed 1,100 pound standard is similarly too lenient.

I would also like to address the question of whether EPA's standards are based on net electrical output – the amount of electricity delivered to the grid – or gross electrical production by the plant. We believe it is important that EPA set the standard based on the net electrical output of each plant, meaning the amount of pollution per kilowatt of electricity delivered to the grid. EPA has proposed standards based on the gross electricity produced by the plant. This approach masks the fact that some plants consume significant quantities of electricity on-site. But what we are all interested in is the amount of useful electricity produced and, in order to allow for an accurate comparison of different plants, EPA needs to base its standard on the net electrical output.

I want to reiterate that EPA should be applauded for issuing this proposal and for the important discussions it has undertaken regarding standards for existing power plants. But we do urge EPA, as it moves forward, to make sure that it sets standards for the gas-fired combustion turbine subcategory at the level that will achieve the largest carbon pollution reductions possible.

Thank you.