

**Testimony of Amanda Levin, Energy and Climate Analyst, Natural Resources Defense Council**

**At the Maryland Office of the Attorney General and the Maryland General Assembly  
Public Hearing on the Trump Administration's Proposed Repeal of the Clean Power Plan**

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As Prepared for Delivery

Good afternoon. My name is Amanda Levin and I am a policy analyst with the Natural Resources Defense Council. I would like to thank the Attorney General's office and the Maryland General Assembly for the opportunity to provide testimony. I am here with three of my colleagues on behalf of NRDC's more than 3 million members and online activists, to oppose the repeal of the Clean Power Plan. Repealing this rule would harm Americans' health and prosperity and worsen climate change.

Recent data underscore that the Clean Power Plan – or CPP - can be achieved easily and at lower cost than EPA estimated back in 2015.

Carbon emissions from the power sector have fallen rapidly over the past decade, due to low natural gas prices, growth in renewable energy, and strengthened public health protections, among other things. In 2016, carbon pollution from power plants fell to the lowest levels *since 1988* in the U.S.<sup>i</sup> And emissions will likely be even lower in 2017. During the first 9 months of 2017, carbon pollution from power plants was 4 percent lower than during the same period in 2016.<sup>ii</sup>

Renewable power, like wind and solar, has grown more than six-fold in the past decade.<sup>iii</sup> Just last month, the U.S. Energy Information Administration estimated that renewables would provide almost 16 percent of the country's power in 2017 – up from just 12 percent in 2015.<sup>iv</sup> This growth in clean energy has been driven by falling costs and state policies. Since 2010, the costs of wind and solar have fallen by 70 and 80 percent, respectively.<sup>v</sup> Wind and solar are now the cheapest sources of new power in the U.S.<sup>vi</sup> And some utilities are buying new renewable plants – with energy storage – for less than just operating existing coal and gas plants.<sup>vii</sup>

States have also accelerated renewable development: 29 states, including Maryland, and DC have binding renewable energy targets.<sup>viii</sup> Maryland increased its target to 25 percent by 2020 last year.<sup>ix</sup>

The CPP builds on these market forces by embracing these flexible strategies already employed by the power sector to reduce harmful pollution. It would gradually phase in emission limits between 2022 and 2030, reducing emissions by 19 percent from 2012 levels. Maryland has already reduced power-related carbon pollution by 10 percent since 2012. And as part of the Regional Greenhouse Gas Initiative, the state will continue to reduce emissions through 2030. Nationwide, power sector carbon emissions have also fallen by 10 percent – achieving more than 55 percent of the cuts required by 2030 in just the past four years.

In its repeal proposal, EPA used misleading accounting to try to make it look like the CPP is more expensive than estimated back in 2015, but study after study has shown that the rule has actually gotten cheaper.<sup>x</sup> The other half of cuts remaining to meet these 2030 goals can be achieved at low cost while maintaining a diverse and reliable electric grid.

The CPP would also be an agent of economic growth. A report from the business group Environmental Entrepreneurs found that the CPP would create 560,000 jobs and add \$52 billion in new economic growth.<sup>xi</sup> That's on top of the 3 million clean energy jobs already in the U.S..<sup>xii</sup>

Maryland is a great example of the economic power of investments in clean energy: according to the Department of Energy, the state has over 75,000 clean energy workers – more than twelve times the number of fossil fuel workers in the state.<sup>xiii</sup> And the state's recent extension of its energy efficiency program - emPOWER Maryland - is expected to save residents around \$1.5 billion on utility bills, add \$3.75 billion to the state's economy, and create 68,000 new jobs over the next decade.<sup>xiv</sup>

In addition to making inaccurate claims about the economic impacts, EPA has attacked the underlying science of this rule to dismiss its overwhelming benefits.

When it issued the CPP in 2015, EPA found the rule produced tremendous climate and public health benefits that far outweighed its costs. In 2030, the net benefits of the CPP were projected to range from \$26 to \$45 billion, based on the best available peer-reviewed science.

In its repeal proposal, EPA used questionable methods to severely deflate the benefits of climate action and downplay the magnitude of public health benefits from this rule. However, the reality is clear: the Clean Power Plan would cut pollution, protect public health, and support new economic opportunities across the country. This rule should not be repealed.

Thank you again for the opportunity to testify on this important matter.

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<sup>i</sup> U.S. Energy Information Administration (EIA), "Carbon Dioxide Emissions from Energy Consumption: Electric Power Sector", *Monthly Energy Review*, [https://www.eia.gov/totalenergy/data/monthly/pdf/sec12\\_9.pdf](https://www.eia.gov/totalenergy/data/monthly/pdf/sec12_9.pdf).

<sup>ii</sup> Ibid.

<sup>iii</sup> U.S. EIA, "Table 1.1. Net Generation by Energy Source: Total (All Sectors), 2007-October 2017", *Electric Power Monthly*, [https://www.eia.gov/electricity/monthly/epm\\_table\\_grapher.php?t=epmt\\_1\\_01](https://www.eia.gov/electricity/monthly/epm_table_grapher.php?t=epmt_1_01).

<sup>iv</sup> U.S. EIA, *Short-Term Energy Outlook*, December 12, 2017, <https://www.eia.gov/outlooks/steo/>.

<sup>v</sup> Lazard, *Lazard's Levelized Cost of Energy Analysis 2017 (LCOE Version 11.0)*, November 2017, <https://www.lazard.com/perspective/levelized-cost-of-energy-2017/> and *Lazard's Levelized Cost of Energy Analysis 2010 (LCOE Version 4.0)*, June 2010, <http://www.puc.pa.gov/pdocs/1173215.pdf>.

<sup>vi</sup> Ibid.

<sup>vii</sup> Xcel Colorado (PSCo), 2017 All Source Solicitation 30-Day Report (Public Version), December 28, 2017. Median bids for wind and solar with storage were \$21.00 and \$36.00 per MWh, respectively. The average operating cost of fossil plants in 2016 was \$36.08/MWh. See U.S. EIA, "Table 8.4. Average Power Plant Operating Expenses for Major U.S. Investor-Owned Electric Utilities, 2006 through 2016", *Electric Power Annual*.

<sup>viii</sup> Barbose, Galen, "U.S. Renewables Portfolio Standards: 2017 Annual Status Report", *Lawrence Berkeley National Lab*, July 2017, <https://emp.lbl.gov/sites/default/files/2017-annual-rps-summary-report.pdf>.

<sup>ix</sup> Database of State Incentives for Renewables & Efficiency (DSIRE), "Renewable Energy Portfolio Standard: Maryland", Last updated September 2017, <http://programs.dsireusa.org/system/program/detail/1085>.

<sup>x</sup> For example, see <http://www.mjbradley.com/news-events/mjba-releases-updated-analysis-clean-power-plan>

<sup>xi</sup> Environmental Entrepreneurs, "Opportunity Lost: How Rolling Back the Clean Power Plan Hurts America's Economy", June 2017, <https://www.e2.org/wp-content/uploads/2017/06/FINAL-CPP-jobs-report-6.21.17.pdf>.

<sup>xii</sup> Department of Energy, "2017 U.S. Energy and Employment Report", January 2017, <https://energy.gov/downloads/2017-us-energy-and-employment-report>.

<sup>xiii</sup> Ibid. See state charts section.

<sup>xiv</sup> American Council for an Energy Efficient Economy, "EmPOWER Maryland Will Create 68,000 New Jobs and Boost GDP in Maryland", March 2017, <http://aceee.org/press/2017/03/empower-maryland-will-create-68000>.