

**Testimony of Kevin Steinberger, Climate and Clean Energy Policy Analyst,  
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**New York City People's Hearing on the Repeal of the Clean Power Plan**

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As Prepared for Delivery

Good afternoon. My name is Kevin Steinberger and I am a policy analyst with the Natural Resources Defense Council in our New York office. I study the health, climate, and economic impacts of clean energy policies.

I would like to thank Attorney General Schneiderman, Mayor De Blasio, and others for the opportunity to provide testimony on the EPA's proposed repeal of the Clean Power Plan.

Since 1970, NRDC's lawyers, scientists, and other environmental specialists have worked to protect the world's natural resources, public health, and the environment. Our top institutional priority is curbing climate changing emissions and building a clean energy future, and we have been deeply engaged on the Clean Power Plan as well climate and clean energy advocacy at the state and regional levels, including here in New York.

I am here today with my colleagues Bruce Ho, Khalil Shahyd, and Vijay Limaye to oppose the repeal of the Clean Power Plan, on behalf of NRDC's 3 million members and online activists, which include over 180,000 New Yorkers.

My testimony will focus on clean energy and climate progress across the country, and how the benefits of the Clean Power Plan far outweighed its modest costs.

The clean energy economy is strong and growing. Renewables are increasingly becoming the lowest-cost option in many regions of the country, and reached a combined 7 percent of the generation mix in 2016.<sup>1,2</sup>

In 2016, U.S. carbon emissions from power plants fell to their lowest levels since 1988.<sup>3</sup> And official data will likely show that emissions were even lower in 2017: carbon pollution from power plants was 4 percent lower in the first 9 months of 2017 than over the same time period in 2016.<sup>4</sup> Carbon emissions from the power sector have been falling rapidly over the past decade, due to:

- Strong renewables growth;
- Flat electricity demand and increased investments in energy efficiency;
- Strengthened public health protections;
- And low natural gas prices.

The Clean Power Plan reinforces and builds on these market trends by embracing the kind of flexible strategies that the industry already employs. The CPP would gradually phase in the emissions limits between 2022 and 2030, and was projected to result in emissions cuts of roughly 32 percent below 2005 levels by 2030, which translates to 19 percent below 2012 levels, which is the baseline year EPA used to set the targets.<sup>5</sup> Since 2012, power sector carbon emissions have already fallen more than 10 percent. In other words, the power sector has already achieved more than 55 percent of the cuts required by 2030 in just the past four years.

In spite of this amazing progress, EPA Administrator Scott Pruitt uses misleading accounting to try to make it look like the Clean Power Plan is now more expensive. The reality is that study after study has shown that the rule has actually gotten cheaper because of these changes taking place in the electricity market. The remaining cuts to meet the Clean Power Plan's 2030 goals can be achieved at low cost while maintaining reliability and a diverse electricity supply mix.<sup>6</sup>

Despite Pruitt's attempts to mislead the public, the Clean Power Plan, coupled with strong investments in energy efficiency, would help accelerate clean energy growth and bolster the economy.

A recent report from the business group Environmental Entrepreneurs found that repealing the Clean Power Plan would deny Americans the opportunity to create 560,000 jobs and to add \$52 billion in economic value.<sup>7</sup> That's in addition to the more than 3 million clean energy jobs in the U.S. already.<sup>8</sup>

The Trump Administration and Scott Pruitt have also continued their war on science in an effort to dismiss the overwhelming benefits of the rule.

When it issued the Clean Power Plan, EPA concluded that the Plan would produce tremendous climate and public health benefits that far outweigh its costs. In 2030, the net benefits – after accounting for costs – were expected to reach \$26 to \$45 billion.<sup>9</sup>

But in this proposal, Scott Pruitt effectively engages in outright climate denial by deflating the benefits of climate action. After his comments denying man-made climate change, it should come as no surprise that Pruitt has instructed his Agency to hide the full costs of climate change from the public.

Administrator Pruitt also tries to downplay the magnitude of public health benefits that the Clean Power Plan would have. In a radical revision that goes against the best available science, Pruitt's EPA attempts to sow confusion about the benefits of reducing air pollution. However, the reality is clear: the Clean Power Plan would cut emissions, protect public health, and result in tremendous economic and societal benefits.

The goals of the Clean Power Plan are readily achievable, at even lower cost than EPA initially projected when it finalized the rule. Despite its best efforts, the EPA cannot escape the conclusion that the CPP has significant climate and public health benefits that far outweigh the modest costs, and the rule should not be repealed.

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

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## References

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- <sup>2</sup> Energy Information Administration, *Frequently Asked Questions: What is U.S. electricity generation by energy source*, <https://www.eia.gov/tools/faqs/faq.php?id=427&t=3>.
- <sup>3</sup> U.S. Energy Information Administration, December 2017 *Monthly Energy Review*, Table 12.6 Carbon Dioxide Emissions from Energy Consumption: Electric Power Sector, <https://www.eia.gov/totalenergy/data/monthly/> (underlying spreadsheet).
- <sup>4</sup> *Id.*
- <sup>5</sup> Environmental Protection Agency, “Regulatory Impact Analysis for the Clean Power Plan Final Rule,” August 2015, <https://19january2017snapshot.epa.gov/sites/production/files/2015-08/documents/cpp-final-rule-ria.pdf>.
- <sup>6</sup> M.J. Bradley and Associates, “EPA’s Clean Power Plan: Summary of IPM Modeling With ITC/PTC Extension,” June 2016, [http://www.mjbradley.com/sites/default/files/MJBA\\_CPP\\_IPM\\_Report\\_III\\_2016-06-01\\_final\\_0.pdf](http://www.mjbradley.com/sites/default/files/MJBA_CPP_IPM_Report_III_2016-06-01_final_0.pdf).
- <sup>7</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>8</sup> Environmental Entrepreneurs, “3 Million Clean Energy Jobs in America,” February 2017, [https://www.e2.org/wp-content/uploads/2017/02/E2\\_CleanEnergyJobs\\_National.pdf](https://www.e2.org/wp-content/uploads/2017/02/E2_CleanEnergyJobs_National.pdf).
- <sup>9</sup> Environmental Protection Agency, “Regulatory Impact Analysis for the Clean Power Plan Final Rule,” August 2015, <https://19january2017snapshot.epa.gov/sites/production/files/2015-08/documents/cpp-final-rule-ria.pdf>.