

Testimony of
Khalil Shahyd – Senior Policy Advocate, Natural Resources Defense Council
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At: Maryland Hearing on the Repeal of the Clean Power Plan

Attention: EPA Docket ID No. EPA-HQ-OAR-2017-0355

Thank you for the opportunity to testify today. I am submitting the following comments on behalf of Energy Efficiency for All (EEFA). We are a national partnership led by Elevate Energy, the National Housing Trust and the Natural Resources Defense Council working to bring awareness to increase energy efficiency in affordable multifamily housing. We work in 12 states with electric and gas utilities and their regulators to design innovative energy efficiency program designs. We advise state housing finance agencies on best practices in encouraging owner engagement and developing creative finance products. We collaborate with owners, managers, businesses and advocates in order to achieve energy savings in multifamily properties.

Two years ago, EEFA collaborated with many partners in the affordable housing community to work with the U.S. Environmental Protection Agency (EPA) to ensure that the Clean Power Plan met the needs presented by the nation's low-income families living in affordable housing in every state and congressional district. We supported the EPA in the development of the Clean Energy Incentive Program in order to "help ensure that the benefits of the CPP are shared broadly across society and that potential adverse impacts on low-income ratepayers are avoided."¹ EPA staff members understand that there have been "historic economic, logistical, and information barriers" to implementing demand-side energy efficiency programs in low-income communities. These barriers have increased the costs and restricted the availability of such programs. As such, low-income households experience an average energy burden of any demographic (7.2 percent) that is twice as high as the median U.S. energy burden (3.5 percent). Furthermore, low-income households have an energy burden that is three times higher than that of non-low-income households it's THREE times higher.

For these reasons, we strongly oppose attempts to weaken, replace or repeal the Clean Power Plan.

Implementing the Clean Power Plan, through the early adoption and incorporation of the Clean Energy Incentive Program would have delivered numerous benefits to the nation's poorest families, those struggling with rising energy costs that are increasing faster even than the cost of housing in many states.

Many low-income and vulnerable households have few residential options but to rely on poor quality housing that results from residential segregation, long-term neighborhood disinvestment, and deferred maintenance of the housing stock. These homes tend to be energy inefficient, impacting the financial stability of many families due to high utility bills and recurring illnesses from poor indoor air quality.

¹ 80 FR 648311

Struggling families sometimes spend more than 20 percent of their incomes on electricity and heat²—far more than the national average of 2.7 percent³. For these people, a cold winter can bring hard choices: Heat or medicine? Utilities or groceries? Or hidden dangers. “Space heaters involved in 79 percent of fatal home heating fires,” when building heating systems are inadequate⁴. Existing weatherization and low-income bill assistance programs are inadequate to meet the existing need for services, much less the growing need in many states. The Clean Power Plan would provide an incentive to expand programs and a market to generate the resources necessary to deliver.

Failure to implement the Clean Power Plan could mean that these households can expect electric bills that are on average \$17 per month higher in 2030 than they would be if we implement existing policy⁵.

Boosting energy efficiency also means we lower the costs of constructing expensive energy infrastructure like power plants and transmission lines, reducing Americans’ energy related utility costs. Further, everyone’s health improves when we help stabilize the climate and reduce the amount of hazardous mercury, sulfur dioxide and particulate matter spewing out of power plant smokestacks and furnaces.

Further, residential energy efficiency is the largest single measure source of potential carbon reductions in the nation. Every year Weatherization Assistance Programs alone reduce America’s climate pollution by two million metric tons⁶. In total, **residential efficiency can account for as much as 550 million metric tons of CO₂⁷, equivalent emissions reductions annually by 2050** (equal to⁸ the combined electric power emissions of California, Texas, New York, Florida, Illinois, and Virginia in 2016).

In addition to the environmental, health and cost saving benefits of investing in energy efficiency, there are [job](#) and [economic development](#) benefits that provide opportunities for families. **In the state of Maryland, retrofitting Multifamily housing alone would create approximately 30thousand jobs in Maryland’s economy. In the Baltimore metro area alone, more than 15thousand jobs could be created by fully funding efforts to retrofit multifamily housing.**

For every dollar invested in energy efficiency for low-income families, two dollars are put back into the economy through energy savings and increased income from job creation. In fact, energy efficiency already accounts for more than 2.2 million jobs across the nation, which is ten times more than oil and gas drilling, and thirty times more than coal mining.

Energy Efficiency can be more than a lifeline for poor families—it’s a smart investment in energy efficiency that creates local jobs, eliminates the need for expensive new power plants, reduces pollution

² http://energyefficiencyforall.org/sites/default/files/Lifting%20the%20High%20Energy%20Burden_0.pdf

³ <https://www.eia.gov/todayinenergy/detail.php?id=10891>

⁴ <http://www.nfpa.org/news-and-research/news-and-media/press-room/news-releases/2010/space-heaters-involved-in-79-percent-of-fatal-home-heating-fires>

⁵ <http://www.synapse-energy.com/sites/default/files/cutting-electric-bills-cpp-march2016.pdf>

⁶ <https://energy.gov/eere/articles/celebrating-40-years-america-s-weatherization-assistance-program>

⁷ <https://www.nrdc.org/experts/roland-hwang/how-clean-energy-can-get-us-safer-climate-future>

⁸ <https://ghgdata.epa.gov/ghgp/main.do>

and saves money for taxpayers nationwide. The Clean Power Plan and the Clean Energy Incentive Program present an opportunity to make smart decisions about our nation's energy future, to benefit consumers, workers, our public health, and the environment. Through the Clean Power Plan, climate action would present an opportunity to build economies, provide well-paying year round jobs for families, and improve the health of nation's people.

Because of these and other benefits, we strongly urge the EPA not to weaken, repeal or replace the Clean Power Plan.

Thank you,