

BlueGreen Alliance Testimony on EPA's Clean Power Plan

Testimony of Kimberly Glas, Executive Director, BlueGreen Alliance at the Public Hearing on EPA's Clean Power Plan Washington, D.C.

Good morning. I am Kimberly Glas, Executive Director of the BlueGreen Alliance, and I thank you for the opportunity to testify about the EPA's proposed rule to limit carbon pollution from existing power plants.

As you've seen throughout the day, there are strong feelings on all sides of this issue. These voices can and must be heard as states develop plans to implement the final rule.

The BlueGreen Alliance is a national partnership of the country's largest labor unions and most influential environmental organizations—representing nearly 16 million members and supporters—working to turn today's environmental challenges into job creating and economic opportunities.

Our members come from every state in the nation and work in a wide range of occupations, including utility workers, steel and auto manufacturing, building and construction workers, teachers, transit operators, hospital and healthcare employees, and telecommunications workers, to just name a few.

The BlueGreen Alliance was founded in 2006 with the recognition that we can no longer be forced to choose between good jobs and a clean environment; that now, we can and must have both. This drives our belief that climate change can and must be addressed in a way that creates and maintains quality jobs and provides economic opportunity. Proposals to address climate change should also work to ensure that the transition to a low-carbon emission economy fosters an improved quality of life. Specifically, efforts to reduce carbon emissions should go hand in hand with efforts to achieve a net increase in the number and quality of family-supporting jobs where workers can exercise their basic rights. It is our responsibility to ensure that these policies create the conditions for a sustainable economy and environment in order to enrich the lives of individuals, families and communities.

Climate change is one of the greatest challenges of our generation. It is a threat to our environment and to our economy, and it is imperative that we take action to address it.

We support the EPA's authority to limit carbon pollution from power plants. We are pleased that this proposed rule permits each state to craft a compliance plan that is tailored to the specifics of its local and regional economy; that will protect existing jobs while reducing emissions; and that can create opportunities to grow new jobs, encourage investment, and jumpstart new technologies.

This proposal can be a significant step forward, if we all engage to develop and implement it.

There are three points I'd like to emphasize this morning:

First, the proposed rule sets reasonable targets for reducing carbon pollution that the final rule should retain.

Second, the proposal's flexible compliance approach is essential to its success.

Third, community and workforce stability and development should be integral elements of any carbon reduction strategy.

I will say just a few words on each point.

First, the reduction targets are reasonable. The EPA began with the status quo in each state—the mix of energy sources that each state was using in 2012. Then the agency applied the same set of existing emissions reductions tools to each state and calculated how much reduction their use could achieve. The result was an emissions target calculated to fit each state's situation.

Not only were these targets individually designed for each state, but the EPA provided a common-sense, measured timetable for their achievement. The proposal sets an interim reduction goal that each state must meet on average between 2020 and 2029. The state must meet its final target by 2030, and maintain that level thereafter. Thus each state has ten years to see its plan in action and make any needed adjustments before it is responsible for meeting its final reduction goal.

In the aggregate, the proposal will help cut carbon pollution from power plants by 30 percent from 2005 levels. These first-ever proposed limits on existing power plant emissions are a substantial step forward in reducing the carbon pollution that fuels climate change. And they will send a forceful message to other nations around the globe that, when it comes to combatting climate change, the United States leads by example.

Second, the proposal offers maximum flexibility for compliance. Each state can determine for itself which carbon reduction mechanisms make the most sense for its citizens, its workers and its economy. Or states can band together to submit regional implementation plans.

As a result, the proposal will permit each state to focus on ensuring power reliability, fostering community stability, and encouraging economic growth—all while reducing carbon dioxide pollution at a measured and responsible pace.

For example:

- A state with multiple coal plants can encourage improvements in both supply and demand. Technological changes can increase the supply of power produced by each ton of coal. Boosting end-use energy efficiency tools will reduce demand for electricity during peak hours. And manufacturing and installing energy-efficiency tools can create new jobs for workers in factories and on construction sites. According to the American Council for an Energy-Efficient Economy, industrial and end-use energy efficiency investments could create a net gain of 611,000 full-time jobs and increase the U.S. Gross Domestic Product by \$17.2 billion by 2030.
- A state whose power comes principally from gas plants may institute diversification incentives, so that renewables supply more of the state's energy mix.
- A state can authorize carbon capture and storage mechanisms to reduce emissions from existing coal plants. This technology has been used successfully in a Department of Energy-sponsored project in Alabama, which captured more than 150,000 metric tons of carbon dioxide per year from a coal power plant. The Department of Energy is helping to fund construction on the largest carbon capture project in the world—the Petra Nova project in Texas—which is projected to capture 90 percent of the carbon dioxide emissions from one of the plant's generators. The BlueGreen Alliance urges the EPA to include in its final rule language encouraging states to use carbon capture mechanisms as a compliance tool.

- A state can approve a carbon credit exchange, by which a facility that uses renewables or other tools to cut emissions below its target could sell its "surplus emission reductions" to another plant for use in meeting its own reduction goals. Such an exchange can also serve as a financing mechanism for the clean energy or technological upgrades, either within a single state or on a regional basis.
- A state can facilitate a plant's retrofitting for an integrated coal gasification combined cycle, which again would reduce carbon emissions.

Finally, I'd like to address community and economic stability and development. Regardless of any action to address climate change, the United States is in the midst of an energy transition that in some cases can lead to job loss. While we believe that states can craft comprehensive implementation plans that result in net job creation across the country, we must be prepared to provide direct support to workers and communities—extending to ancillary and support sectors as well as the utility sector—if and when a power plant shuts down.

A proper transition means direct support for workers by providing wages, benefits, training, education and the recognition of basic workers' rights. It also means providing a community with resources to redevelop its economy and create high-paying jobs that can match or exceed those that may have been lost. The private sector, including utilities, and all levels of government must work in tandem with communities to make these transitions a success.

We believe that, if well crafted, the Clean Power Plan has the potential to create and sustain quality, family-sustaining jobs across the country. This potential can only be realized by engagement with stakeholders to develop a plan that includes adequately funded programs to meet the needs of workers and their industries as well as the communities and states in which they live.

We at the BlueGreen Alliance applaud the EPA for moving forward on addressing the threat of climate change. And we look forward to working in states to develop well-crafted implementation plans that achieve these goals.

Thank you.



The BlueGreen Alliance unites 15 of our country's largest unions and environmental organizations. Acting together, through nearly 16 million members and supporters, we are a powerful voice for building a cleaner, fairer and more competitive American economy.

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