Testimony EPA's Proposed Rule "Carbon Pollution Emission Guidelines for Existing Stationary Sources: Electric Utility Generating Units" Docket Number EPA-HQ-OAR-2013-0602

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My name is Greg Andeck, and I am from North Carolina. Thank you for the opportunity to testify today.

I am representing Environmental Defense Fund. EDF is a national organization with 800,000 members. EDF links science, economics, law and private-sector partnerships to solve our most serious environmental challenges.

The proposed Clean Power Plan is a critical step to reduce climate pollution emitted from U.S. power plants, one of the largest sources of greenhouse gases in the world. EDF strongly supports the proposed Clean Power Plan.

The recent Risky Business report documented substantial economic costs from climate change that will affect the Southeast: damage and loss of coastal infrastructure and property; extreme heat impacts; and shifting patterns in agriculture.

The Southeast is the region expected to be the most affected by increasing temperatures. Extremely hot days -95° F or above - could cause a decrease in labor productivity by 3.2% in the construction, mining, utilities, transportation, and agricultural sectors. Extreme heat also is projected to cause 11,000 to 36,000 more deaths each year.

Another report – the National Climate Assessment – found that climate change, just in Georgia alone, could reduce corn yields by 15% and reduce wheat yields by 20% by 2020, only six years away. Recall that the drought in 2007 cost Georgia's economy \$339 million in crop losses.

Fortunately, we know how to reduce carbon pollution from power plants. Update the existing fleet. Rely more on lower-polluting generation, such as wind and solar. Increase energy efficiency. The benefits: healthier families, more jobs, and economic development across the Southeast.

North Carolina, home to the country's largest electric utility, illustrates how states could benefit from the flexibility proposed in the Clean Power Plan. The plan would allow North Carolina to get credit for steps it already has taken to grow clean energy and invest in energy efficiency. Here are some examples:

- North Carolina has an energy efficiency policy that allows utilities to earn a fair return when they make energy efficiency investments rather than build new, traditional power plants.
- North Carolina has a Renewable Portfolio Standard that requires investor owned utilities to increase their mix of clean energy and energy efficiency resources to 12.5% by 2021. The RPS will help the state comply with the emission reduction targets cost-effectively while cutting emissions of carbon pollution and other pollutants harmful to public health.
- North Carolina proves the clean energy economy benefits our citizens. North Carolina's solar industry is now ranked 4th in the country in installed solar capacity, thanks to policies that make it easier for investors to finance projects.
- North Carolina has more than 1,000 clean energy and energy efficiency companies that can help the state meet the Clean Power Plan.

North Carolina demonstrates how a state can move to a clean energy economy in a thoughtful, measured and cost-effective manner. Other Southeast states can adopt similar policies and programs to reduce carbon emissions while balancing regional economic needs.

Now we need the Clean Power Plan to help our entire country transition quickly and costeffectively to a clean energy economy.

Thank you again for the opportunity to testify. EDF will be submitting additional technical comments on the rule.