



NERC's Flawed Assessment of the Clean Power Plan

America Can Protect Public Health from Pollution, Strengthen Our Economy and Ensure a Steady Flow of Affordable Electricity

The U.S. Environmental Protection Agency (EPA) will soon finalize the Clean Power Plan – a common sense plan to cut carbon pollution from power plants.

The Clean Power Plan will:

- Affordably and reliably cut carbon pollution by 30 percent compared to 2005 levels
- Will do so by giving states the tools and flexibilities they need

America has already made significant progress towards the long-term goals of the Clean Power Plan. **We have reduced emissions 15 percent below 2005 levels already.**

However, in an April, 2015 assessment, the North American Electric Reliability Corporation (NERC), reached conclusions that starkly contrast from this progress. **Critical assumptions used in the NERC Assessment inaccurately assume energy efficiency, solar energy, and wind energy installations far below the growth patterns seen over the past several years and the estimates used by industry experts:**

- NERC assumes that only 12 to 20 gigawatts of new solar generation will be integrated into the grid by 2030. **Recent industry analysis suggests that our nation will build 20 gigawatts of solar in the next two years alone.**
- NERC assumes that less than 2 gigawatts of new wind power will be built each year through 2030. **Recent reports suggest the U.S. will build 18 gigawatts of wind from 2015 to 2016 alone.**
- NERC assumes that our nation will only build 11 to 12 gigawatts of total new capacity each year. **The grid has added roughly 30 gigawatts of new generation each year since 2000.**

NERC has offered inaccurate assessments before:

- In 2011, NERC predicted reliability concerns from the Mercury and Air Toxics Standards, Cross State Air Pollution Rule, Clean Water Act Cooling Water Intake Structures rule, and Coal Combustion Residuals rule. **EPA noted at the time that NERC's analysis was flawed, and NERC's predictions have not manifested in practice.**
- In 2007, NERC predicted reliability concerns in several regions in the U.S., based in part on proposed environmental protections. Power generators in turn used NERC's analysis

in opposition to the Regional Greenhouse Gas Initiative. ***NERC's predictions again did not occur, even as greenhouse gas emissions fell nearly 50 percent below the region-wide emissions cap.***

- In 2000, NERC predicted that EPA's nitrogen oxide emissions rule for eastern power plants, known as the NOx SIP Call, would create reliability concerns. ***Yet again, NERC's predictions did not occur after the rule was implemented.***

NERC has repeatedly produced analyses indicating that public health and environmental safeguards will come at the expense of electric reliability -- **and these analyses have consistently been contradicted by reality.**

Clean air standards have never caused a reliability event in the more than four decades that EPA has been administering the Clean Air Act.

The proposed Clean Power Plan provides tremendous compliance flexibility for states and power companies.

This extraordinary flexibility, our nation's time-tested history of well-designed and effectively implemented clean air protections, and the extensive tools grid operators have to ensure a steady flow of electricity all make it clear that **the Clean Power Plan will be compatible with a reliable electric grid.**

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