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## Comments on the Proposed Clean Power Plan

I would like to begin by commending EPA for publishing this draft rule to responsibly and achievably limit carbon pollution. Keeping the rule at least as strong as it is now, in its final version, is essential to saving places and people I hold dear.

The first time I heard about the greenhouse effect and global warming was in my 9<sup>th</sup> grade earth science class. We learned about it just as we learned about the hole in the ozone layer and acid rain. Since America had joined with the world to tackle these problems, I expected we'd do the same for carbon dioxide. I didn't appreciate the vast political challenges at the time.

Yet the faith I was raised in calls me to participate in making the world I live in a better place, so I've tried to do my part. I've lived in the shadow of mountaintop removal in West Virginia, working to bring renewable energy to the coalfields. I've talked to thousands of coastal Louisianans about the storm surge protection they're losing, as seas rise and marshes are cut away by oil and gas companies. Today, I'm an organizer with the Southern Alliance for Clean Energy, working to reduce our dependence on coal for electricity, and increase opportunities for smart energy choices like efficiency, solar and wind, mainly in Georgia and Alabama. Now, I understand the political challenges a little better.

I work on clean energy because it's the intersection of environmental justice and economic justice – wealth creation that can benefit everyone. It is essential to the most vulnerable among us – those who cannot relocate, for example, as their inland communities become high-rent beachfront real estate in Miami, or those who need help to fix up old leaky homes so they're not paying to air condition the back yard, who then suffer even more as heat waves increase. These are often the people who have the least say in how energy decisions are made.

I am here today to urge EPA to not let utility companies convince you or anyone else that consumers will necessarily pay more to meet carbon emission limits. If customers pay more, it will likely be because utilities like Georgia Power and Alabama Power and their friendly regulators choose to prioritize profits over cost-saving benefits to billpayers. Some utilities, like TVA, are

moving in the right direction, while others may need stronger guidance from EPA.

I'd like to tell a story about one utility, Alabama Power, as an example. Between this year and 2018, Alabama Power will spend over a billion dollars to keep its old coal plants running, on top of a couple billion they've already spent.<sup>1</sup> The company earns a roughly 13.5% guaranteed profit – about 40% higher than the industry average of around 10% profit margin. Basically, the more they spend, the more they make, so it's no wonder when it comes to future energy resources, they choose an expensive approach! Unfortunately, Alabama does not require a transparent comparison of the costs of energy generation choices, so there is virtually no check on this profit incentive. The lack of balance between profit and prudence is what really hurts ratepayers.

Would rates be lower for Alabama Power customers if the company followed the lead of many southeastern peers and let some coal capacity go, investing instead in cleaner sources, particularly energy efficiency programs? I believe the answer is yes, and EPA's own research confirms that prioritizing energy efficiency and renewables in efforts to comply with the Clean Power Plan will in fact lower rates over time. We also know that energy efficiency lowers BILLS – and that is better for consumers, no question.

The potential to create a comparison process that fairly values energy efficiency and renewables as generation resources is one of the many benefits of this rule. But given the profit incentive of the status quo, we can expect utilities to protest, and the elected officials to whom they contribute, to remain in lock step.

So when you feel pressure to back off, please remember why you chose to work in Environmental Protection, and stay strong for the solutions we need to protect our planet AND the people. Help these utilities see the tremendous power you've given them to use creative, clean solutions. Give this country the strong final carbon pollution rule we've needed since I was a kid.

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<sup>1</sup> According to documents presented by Alabama Power to the Alabama Public Service commission on Dec 10, 2013. For more, see <http://blog.cleanenergy.org/2013/12/12/alabama-power-distracts-from-real-issues-at-informal-hearing/>