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Comments on the Proposed Clean Power Plan

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Thank you for the opportunity to speak in strong support of the draft EPA Clean Power Plan. My name is Dr. Stephen Smith; I am the Executive Director of the Southern Alliance for Clean Energy (cleanenergy.org). Our organization works across the southeast United States to reduce the health and environmental impacts of how we produce and consume energy.

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Trained in the sciences as a Veterinarian, my biology and chemistry background coupled with training in systems theory has enabled me to follow the complex yet rapidly changing global climate science and the increasing apparent impacts of climate disruption. While my training and vocation motivate me to speak in support of the proposed rule, my primary motivation is that I'm a father of three sons and I have two grandsons. It is in my role as a father and grandfather that I worry the most about what kind of a world we will leave for our children.

I have been blessed in my 50 plus years to see and enjoy healthy coral reefs, beautiful beaches, biologically-diverse mountain forests, abundant farms and gardens, never seriously worrying about our food supply. My years of healthy southern living have been made possible by a stable climate with few extremes and the work of the generations before me that understood and accepted science and took actions like the eradication of many vector-borne diseases such as malaria in our region. The commitment of every generation to attempt to leave the world better for the one who follows has made my life rich, comfortable and fulfilling. I fear that my generation is not committed to the same future for our children.

Rejecting science and failing to address and curb global warming pollution, which is leading to climate change and extreme climate disruption, shreds this intergenerational commitment of leaving a better world to our children. Irresponsibly passing on a future of increasingly extreme climate will assure my children and grandchildren a much-diminished life. This is not acceptable to me as a father and grandfather.

Why, when we have the tools to address this problem, would we choose to place our children's future in peril? Having spent much time in my professional career studying the energy sector, I know we have low or no carbon technologies like renewable energy that are cost effective today. We have a deep well of energy efficiency technologies that can dramatically reduce waste and squeeze more

work out of each kilowatt we produce. There is not technological reason why are not solving the climate crisis.

What is blocking our fulfillment of the intergenerational bond of a better world? It is simply those who have a financial interest in their current high carbon pollution investments. These individuals and their companies have a vested interest in **not** addressing this critical issue. They intentionally muddy the water with pseudo-science and obstruct the political and regulatory processes with mouthpieces that have bought into, both figuratively and literally, their misinformation campaign. Today many of these individuals will be speaking here, questioning the scientific consensus, warning of economic calamity while downplaying the risk.

My favorite argument against this rule has been offered by my friends in the utility industry. They complain about how complicated this rule is, “most complicated rule ever issued” I have heard them say. Of course these are the same voices that have repeatedly called for greater flexibility in rulemaking. See, if EPA had issued a simple command and control emission target these voices would cry it was “too proscriptive and not flexible enough;” now given a flexible rule with multiple pathways for compliance, it’s “too complicated.”

Let’s not make this too complicated, the opposition to this rule is here for one reason and one reason only, to protect the interest of industries that emit carbon pollution, or protect their investment in technologies that emit large amounts of carbon, all at our expense. They ignore the innovation, technological advancement and power of a properly configured market to solve this problem, choosing instead to cling to an outdated worldview and business model. Yes, in a free society, they have that right. One right they **do not** have is to allow their poorly conceived business interest to shred the intergenerational compact of all mothers and fathers, myself included, that we will leave the world a better place than the one we inherited for our children and grandchildren.

That is why I ask EPA to move forward with deliberate speed with this long overdue, modest rule to start us on a path to a positive future by addressing carbon pollution.