American Council for an Energy-Efficient Economy
529 14th Street, N. W., Suite 600 Washington, D.C. 20045 202.507.4000 202.429.2248 www.aceee.org

February 26, 2018

Scott Pruitt
Administrator
U.S. Environmental Protection Agency
1200 Pennsylvania Avenue NW
Washington, DC 20460
VIA EMAIL to: a-and-r-Docket@epa.gov

Ed. note: click on attachment descriptions to download attachments.

Re: Docket ID Number EPA–HQ–OAR–2017–0545

Comments on State Guidelines for Greenhouse Gas Emissions from Existing Electric Utility Generating Units

Administrator Pruitt,

The American Council for an Energy-Efficient Economy (ACEEE) is a nonprofit 501(c)(3) research organization that acts as a catalyst to advance energy efficiency (EE) policies, programs, technologies, investments, and behaviors. We believe that the United States can harness the full potential of energy efficiency to achieve greater economic prosperity, energy security, and environmental protection for all of its people.

We are writing in response to the opportunity to comment on state guidelines for greenhouse gas emissions from existing electric utility generating units (Docket ID Number EPA–HQ–OAR–2017–0545). In any future rulemaking, we urge you to consider the most abundant and affordable resource states have to reduce greenhouse gas emissions from the power sector: end-use energy efficiency. We have attached to this letter and submitted as part of our formal comments several resources that provide analysis and recommendations for using energy efficiency as a strategy to reduce carbon dioxide pollution from power plants.

Attachment 1: ***Change Is in the Air: How States Can Harness Energy Efficiency to Strengthen the Economy and Reduce Pollution***
This study evaluates the implications of using end-use energy efficiency to reduce greenhouse gas emissions from the power sector. It quantifies the energy, economic, and pollution-reduction impacts of selected energy-saving policies on a state-by-state basis. We evaluate four of the most common and effective energy efficiency policy options available to a state:

- Implement an energy efficiency savings target
- Enact national model building codes
- Construct combined heat and power systems
- Adopt efficiency standards for products/equipment

Attachment 2: ***Saving Energy, Saving Lives: The Health Impacts of Avoiding Power Plant Pollution with Energy Efficiency***
This report estimates the health and environmental benefits that would come from a nationwide 15% reduction in annual electric consumption. We present results for the nation, states, and 50 largest US cities. We describe how these results might be achieved and how efficiency programs and policies can be designed to maximize public health benefits.

Attachment 3: ***The Role of Building Energy Codes in the Clean Power Plan***
In this paper we determine whether building energy codes should be considered in setting standards of performance under 111(d). We look at what it means for a control measure to be part of the "best" system of emission reduction (BSER) and whether it has been "adequately demonstrated."

Attachment 4: ***Energy Efficiency and Greenhouse Gas Limits for Existing Power Plants: Learning from EPA Precedent***
This analysis examines several previously adopted EPA programs to show the potential inclusion of end-use energy efficiency as a 111(d) compliance option. It identifies key issues regarding the role of end-use energy efficiency under Section 111(d) to delineate Clean Air Act rules and regulations.

Attachment 5: ***Trailblazing Without the Smog: Incorporating Energy Efficiency into Greenhouse Gas Limits for Existing Power Plants***
This report recommends how to design a 111(d) rulemaking to optimize the role of end-use efficiency in achieving meaningful greenhouse gas reductions from the power sector.

Attachment 6: ***Energy Efficiency Lowers the Cost of Clean Power Plan Compliance***
This fact sheet looks at three studies that find including energy efficiency in state plans to reduce greenhouse gases will lower costs to ratepayers. One study finds that an energy efficiency scenario reduced electric bills by 17%. Another shows that using energy efficiency for compliance with Clean Power Plan targets will, in most states, cut bills at least $10 per month.

Attachment 7: ***How Much Does Energy Efficiency Cost?***
This fact sheet summarizes the results of studies by Lawrence Berkeley National Laboratory, ACEEE, and the Environmental Protection Agency (EPA) on the cost of energy efficiency programs. Findings show that energy efficiency is consistently the lowest cost option for meeting electric demand. One of the studies finds that the costs of energy efficiency have been level in recent years.

This set of analyses demonstrates that energy efficiency is an abundant resource that states can use to affordably reduce carbon dioxide pollution from the electric generating sector. We welcome any questions you may have and invite further discussion on ways that a future rulemaking might be designed to help states take advantage of one of their greatest opportunities to strengthen the economy, create jobs, and reduce pollution.

Respectfully submitted,

Sara Hayes
Program Manager, Health and Environment
American Council for an Energy-Efficient Economy