Congress of the United States Washington, DC 20515

February 3, 2015

The Honorable Gina McCarthy Administrator Environmental Protection Agency 1200 Pennsylvania Avenue, N.W. Washington, DC 20460

Dear Administrator McCarthy:

We write to express our concerns regarding the proposed "Clean Power Plan" for the Clean Air Act section 111(d) announced by the Environmental Protection Agency on June 2, 2014 and the proposed goal of Washington State reducing carbon emissions by 72 percent, which would be the largest reduction goal issued to any state in the country.

Not only is this proposal an unprecedented attempt by the EPA to change the way our State will generate and consume electricity, the proposed rule also ignores Washington State's current status as one of the lowest carbon emitters in the country. As such, our State will be forced to employ energy sources that are far less reliable and much more costly at the expense of our largest, most abundant energy resource – hydropower.

Hydropower is our nation's most reliable, affordable, and renewable energy source. In fact, last year, hydropower was the single largest source of renewable electricity. Additionally, in Washington – a state that gets over 75 percent of its power from this clean and renewable energy source – we have experienced first-hand hydropower's tremendous benefits. Hydropower, and the affordable rates that come with it, encouraged high tech companies like Google and Yahoo to relocate their servers to our state and have also contributed to the creation of manufacturing facilities such as Moses Lake's BMW carbon fiber plant. Yet, in EPA's proposed rule, hydropower is effectively ignored and as such, Washington State is disproportionately affected by EPA's proposed rule.

In the rule, the EPA used a 2012 baseline to develop emissions targets in order to create a 30 percent carbon reduction goal. The problem with using an arbitrary year as a baseline, instead of using the average of multiple years, is that in 2012, Washington State had an abnormally high hydropower year which resulted in a very low carbon emissions year.

Not only is the State's hydropower production being ignored, but other factors, such as the stringent forced shutdown timeline of the Centralia Coal Plant, make the EPA rule un-functional. The State already has a plan currently in place to fully shut down the Centralia Coal Plant, the State's only coal plant, by 2025. However the EPA's proposed rule forces the shut down by 2020. With the 2025 shutdown already in place, this leaves a five year gap in which the quick shutdown would lead to a reduced energy supply. This means that new energy sources would

have to be created in order to account for this shortened capacity – this is simply not realistic to do in the short amount of time.

Washington State has a positive emissions story to tell. The State emits less than 7 million metric tons of carbon (by the EPA's own estimates), making it the ninth lowest emitter in the nation. In fact, according the U.S. Energy Information Administration, in 2012 the State emitted only 132 pounds per megawatt of carbon dioxide, the lowest out of any state in the country. Yet, under the proposed regulation, the EPA treats Washington State as the nation's top carbon offender. The rule does not give early renewable energy champions credit for already reducing carbon emissions. Thus, because Washington has already reduced emissions, it will be much more difficult to reduce emissions even further.

While the details of this proposed rule are still being evaluated by all stakeholders, as written, the proposed rule is unworkable for not only Washington State but for the entire country. This will lead to an increased cost of manufacturing, price of goods, and ultimately lead to businesses leaving the State, resulting in job losses. As such, we urge you to reconsider the proposed rule and look to innovative solutions that Washington State is already employing through the use of hydropower to promote lower electricity costs, meet power demands, and promote overall consumer well-being.

Sincerely,

Dave Reichert

Member of Congress

Cathy McMorris Rodgers

Member of Congress

Dan Newhouse

Member of Congress

Jaime Herrera Beutler

Member of Congress

CC: The Honorable Jay Inslee Governor, State of Washington