

CATHY McMORRIS RODGERS
5TH DISTRICT, WASHINGTON

REPUBLICAN CONFERENCE
CHAIR

DEPUTY WHIP

COMMITTEE:
ENERGY AND COMMERCE
SUBCOMMITTEE ON HEALTH

Congress of the United States

House of Representatives

June 19, 2014

COUNTIES:
ASOTIN
COLUMBIA
FERRY
GARFIELD
LINCOLN
PEND OREILLE
SPOKANE
STEVENS
WALLA WALLA
WHITMAN

The Honorable Gina McCarthy
Administrator
U.S. Environmental Protection Agency
1200 Pennsylvania Avenue NW
Washington, DC 20460

Dear Administrator McCarthy:

I write to express my concern regarding the Environmental Protection Agency (EPA)'s recent release of proposed carbon emission regulations titled "Emission Guidelines for Existing Stationary Sources: Electric Utility Generating Units on existing power plants" and the specific state goal of reducing carbon emissions by 72 percent, the largest reduction asked of any state in the county. The proposed rule not only ignores Washington State's current status as one of the lowest carbon emitters in the country, but it also forces the state to employ energy sources that are far less reliable and much more costly at the expense of our largest, most abundant energy resource - hydropower. To that end, I respectfully request that you reevaluate the approach currently taken by EPA and the impact that the proposed goal will have on Washington State.

Washington State has a positive emissions story to tell. Coal makes up less than 3.5 percent of Washington State's total electric utility generating capacity, with the only commercial coal-fired power plant in the State already being phased out by 2025. The state already emits less than 7 million metric tons of carbon (by the EPA's own estimates), making it the ninth lowest emitter in the nation. Yet, under the proposed regulation, the EPA treats Washington State as the nation's top carbon offender. Moreover, the EPA is forcing Washington State to make changes in such a way that currently discounts the state's primary source of power, hydropower, which already makes Washington State among the cleanest and greenest in the nation.

A review of EPA's methodology underscores the Administration's real motive. First, the EPA imposes a six percent reduction rate on all states' 2012 coal-fired carbon emissions. In a state in which there will not be one single coal-fired power plant by 2025 and already emits less than 7 million metric tons of carbon - diverting resources to achieve a six percent reduction is inexplicable not to mention cost prohibitive. The EPA also requires states to make "dispatch" changes, which includes moving power needs to low emission sources such as natural gas combined cycle (NGCC). The rule presumes that states will utilize NGCC plants 70 percent of the time, thereby replacing higher emitting carbon sources. Again, with one of the lowest emissions rates already in place, it is unclear why the EPA is forcing Washington State to divert scarce resources to an energy source that contributes to approximately five percent of our electricity needs. Third, the EPA assumes and encourages the use of low and/or zero emitting power sources but specifically excludes hydropower. To estimate the potential power generated

203 CANNON HOUSE OFFICE BUILDING
WASHINGTON, DC 20515
(202) 225-2006
FAX: (202) 225-3392

10 NORTH POST STREET, SUITE 625
SPOKANE, WA 99201
(509) 353-2374
FAX: (202) 225-3392

555 SOUTH MAIN
COLVILLE, WA 99114
(509) 684-3481
FAX: (202) 225-3392

29 SOUTH PALOUSE STREET
WALLA WALLA, WA 99362
(509) 529-9358
FAX: (202) 225-3392

www.mcmorrisrodgers.house.gov
www.mcmorrisrodgers.house.gov/facebook

by renewable energy sources, the EPA grouped states into six regions, took the average renewable energy standard and potential growth in electricity, and applied those findings to individual states. Yet, the EPA specifically excluded hydropower, 70 percent of Washington State's energy portfolio, from its regional calculations. Finally, the EPA looked to demand side reduction, which Washington State already addresses in a number of ways.

The EPA talks a great deal about state flexibility. Yet, the facts suggest otherwise. If the regulation is finalized in its current form, EPA would have Washington State meet its electricity needs through resources that make up less than 30 percent of its entire energy portfolio – intermittent and costly energy resources at best. As a result, the only real losers under this proposed regulation will be the residents of Washington State who will most certainly be facing job losses and higher electricity bills. Washington State is already making significant strides to address carbon emissions and to protect the health and well being of residents.

I urge you to reconsider the proposed regulation and look to the 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,

A handwritten signature in black ink that reads "Cathy McMorris Rodgers". The signature is written in a cursive, flowing style with a long horizontal line extending to the right.

Cathy McMorris Rodgers
Member of Congress