

Pennsylvania DEP Listening Session  
on Section 111(d) Guidelines

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Good afternoon. My name is Michael Welsh and I am here on behalf of International Brotherhood of Electrical Workers. We represent approximately 29,000 jobs in Pennsylvania and another 87,000 jobs in our Third District which includes Delaware, New Jersey, New York and Pennsylvania. The future of our union's jobs and the welfare of our families and communities will be vitally impacted by EPA's decisions on the guidelines for existing source greenhouse gas controls for power plants scheduled to be proposed in June 2014.

Many unions are experiencing unprecedented job losses due to the shutdowns of coal plants that are occurring in response to EPA's mercury rule and lower natural gas prices. The U.S. Department of Energy projects that more than 50,000 megawatts of coal capacity will be shut down over the next few years. Most of these closures will occur at older and smaller coal plants that are not economic to retrofit scrubbers and other controls needed to meet the new mercury standards.

These job losses will accelerate in 2015 and 2016 when the mercury rule takes effect. We, along with other unions involved in the maintenance, fuel supply, and operation of coal plants, will lose tens of thousands of high-paying, high-skilled jobs that will not be made up if more natural gas replaces coal. Many natural gas generating plants are remotely controlled, and have few permanent employees. Fracking jobs are temporary, and most are non-union.

Our primary concern about EPA's existing source "guidelines" for CO2 reductions is finding ways to avoid the loss of jobs at plants that have just invested billions in retrofit controls.

We know that states are supposed to have a lot of discretion in this program, and we do not want to see arbitrary CO2 emission rate targets imposed on states that would force a lot of additional plant closures and job losses. Some environmental groups are urging you to set such targets, which we strongly oppose. According to the US EPA Clean Air Markets Acid Rain Program data base, CO2 emissions from Pennsylvania coal electric generating units are already 28% below 2005 levels. We feel the State should be allowed to have credit for that reduction towards the 2020 goal.

We believe that the Clean Air Act calls for plant-by-plant assessments, by the states, of what amounts of CO2 can reasonably be reduced at existing plants, such as by efficiency improvements. We also must note that CO2 emissions from coal plants are down 23% from 2005 levels, and will be further reduced as more plants are shut down. U.S. coal generation is only 4% of global energy-related CO2 emissions, so even major reductions would not have any meaningful future impact on global climate. India, China and other developing countries are the principal sources of future greenhouse gas emissions growth, and these countries have not agreed to any legally binding limits on their emissions growth; while U.S. emissions are declining and are on track to meet the President's target of a 17% reduction from 2005 levels by 2020.

We are not putting our heads in the sand. We will support reasonable measures to increase energy efficiency at coal generation plants, reducing their CO2 emissions. However, we cannot support arbitrary targets that would force a new wave of plant closures and job losses.

I thank you for this opportunity to come before this committee today.