

Talking Points for Pennsylvania Department of Environmental
Protection Listening Session
on Greenhouse Gas Guidelines for Existing
Coal-Fired Power Plants

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Good afternoon. I am Ed Yankovich and I am speaking on behalf of the United Mine Workers of America. We represent approximately 6000 direct jobs in the tri-state region of Pennsylvania, Southeastern Ohio and Northern West Virginia.

There is no more important regulation in EPA's pipeline than this one. EPA's guidelines for existing source greenhouse gas controls for power plants are scheduled to be proposed in June 2014. The welfare of our families - and the communities supported by our jobs, and the tax base for local schools and other vital services created by existing power plants - are all at stake.

- We already are experiencing job losses due to the shutdowns of coal plants in response to EPA's new mercury rule and the lower price of natural gas. It is widely recognized that 50,000 megawatts of coal capacity - or more - will be shut down. This will represent the largest job loss in the history of the Clean Air Act.
- These job losses will escalate in the next few years due to compliance with the mercury rule. Unions involved in the coal supply and transportation, maintenance, and operation of coal plants will lose thousands of high-skilled jobs. These jobs will not be replaced if the utility industry is required to substitute more natural gas for coal. Natural gas generating plants have very few permanent employees.
- EPA's guidelines for existing sources will come in the heels of its September 20th proposal on new source greenhouse gas limits. EPA's September 20th proposal for new source CO2 standards mandates CCS and will prevent the construction of any new coal plants. EPA's data show that it raises the cost of electricity from a

new supercritical plant by 36% to 81%, depending on whether it uses partial or full CCS. Costs for plants that have access to enhanced oil recovery markets for CO₂ sales are 17% to 42% higher than EPA's base case. In our view, only large-scale government funding programs can lead to the deployment of CCS technologies at new or existing power plants.

- States have a lot of discretion in the existing source program, and we cannot support arbitrary CO₂ emission rate guidelines that would force additional plant closures and job losses.
- We believe it is essential that EPA's existing source guidelines provide for states to avoid the loss of jobs at plants that have invested in controls to meet the new mercury rules. The way to do that is to provide for unit-specific assessments of efficiency improvements and similar initiatives that can reduce emissions.
- Section 111(d) of the Clean Air Act calls for this kind of "inside the fence" assessment, by the states, of what amounts of CO₂ can be reduced at existing plants. It specifically allows states to take into account the remaining useful life of the source.
- We encourage EPA to provide guidelines that will support reasonable measures to increase energy efficiency at coal generation plants. However, we cannot accept arbitrary and unachievable emission reduction goals that would bring on another round of plant closures. We seriously doubt that electric reliability could be maintained under these circumstances.
- The U.S. coal-based electric generation system has over 300,000 megawatts of capacity, and represents 3% of global greenhouse gas emissions. Since 2005, CO₂ emissions from the coal fleet have declined by 23%, in excess of President Obama's 17% reduction target for 2020. In short, we already have done our fair share.

Thank you.