

The Honorable Michael Regan, EPA Administrator  
U.S. Environmental Protection Agency  
1200 Pennsylvania Avenue NW  
Washington, DC 20460

April 18, 2023

**Re: EPA must accelerate its efforts to cut climate pollution from the power sector**

Dear Administrator Regan,

As local organizations committed to ensuring Pennsylvania addresses climate change and equitably slashes climate pollution across its economy, we write to urge the EPA to accelerate its efforts to decarbonize the nation's power sector. These efforts must include robust carbon pollution standards for new and existing power plants.

The power sector remains the second largest source of climate pollution in the U.S., emitting [1.55 billion metric tons](#) of carbon dioxide (CO<sub>2</sub>) in 2021—approximately 32 percent of U.S. CO<sub>2</sub> emissions. Pennsylvania's power sector is the third-dirtiest in the country, emitting [nearly 80 million metric tons](#) of CO<sub>2</sub> in 2021, the state's highest total since 2016. Cleaning up the power sector also enables decarbonization of other sectors of the economy and is therefore the linchpin to a just, inclusive, and thriving clean energy transition.

Cutting power sector pollution would also create massive benefits for public health. Reducing deadly air pollutants like soot, smog, and mercury, can prevent [hundreds of thousands of premature deaths](#) nationwide. Air pollution from the power sector is also a key driver of environmental injustice. Eliminating this pollution can help reduce the [disproportionate health impact](#) of pollution that low-income and communities of color have borne for decades.

The U.S. took an important step on clean energy in 2022, when Congress and President Biden enacted the Inflation Reduction Act (IRA). However, according to [new modeling](#), the administration must take further action to meet its clean energy goals this decade. The IRA's investments are projected to increase carbon-free electricity in the U.S. from approximately 40 percent in 2022 to 66 percent clean power by 2030. This falls short of the 80 percent intermediate target that's consistent with President Biden's [campaign promise](#) of 100 percent clean electricity by 2035.

Moreover, the IRA is estimated to help cut economy-wide greenhouse gas (GHG) pollution to 40 percent below 2005 levels by 2030—an important step but still short of America's 50–52 percent commitment under the Paris Agreement. The power sector represents the largest near-term opportunity to reduce emissions in line with this goal.

To close the gaps between U.S. climate and clean power targets and our current trajectory, and to further advance President Biden's critical climate and environmental justice commitments, we urge EPA to take decisive action to cut pollution and advance clean electricity in the power sector over the next two years, including:

- **Set ambitious carbon pollution standards** for new and existing power plants under sections 111(b) and 111(d) of the Clean Air Act. By pairing the IRA with strong EPA carbon standards for power plants, the Biden administration could cut power sector carbon pollution to [77 percent below 2005 levels and achieve a 76 percent clean electrical grid](#) by the end of this decade.
- **Set other EPA pollution standards** that reduce conventional air and water pollutants and improve public health. EPA has long-standing legal authority to regulate sources of air, water, and other pollution under key environmental laws, including the Clean Air Act, the Clean Water Act, and the Resource Conservation and Recovery Act. EPA should act quickly to execute an agenda that harmonizes many of the regulations in a [multi-pollutant strategy](#) to decrease pollution from the power sector.
- **Implement the Inflation Reduction Act effectively, efficiently, and equitably.** IRA climate and clean energy provisions can bring down power sector carbon emissions to [66 percent below 2005 levels by 2030](#). But these reductions will only be realized if EPA implements the programs effectively and efficiently, with timely federal guidance on tax credits and grant programs and the distribution of funds in a way that maximizes carbon reductions and equitable economic opportunity.

### **Further and faster**

We urge bold, decisive action because, unfortunately, EPA is [falling behind schedule](#) on seven out of ten critical rules. Without further concerted effort, the agency risks leaving this crucial business undone at the end of President Biden's first term. Issuing final rules in the months before the 2024 election also leaves them open to possible repeal by the [Congressional Review Act](#), meaning EPA could not issue any rule "substantially the same" without new legislation. We urge EPA to move more expeditiously in power sector pollution rulemaking, accelerating the road to clean power and ensuring critical regulations are not left vulnerable to the Congressional Review Act.

**For more detailed recommendations, see [Evergreen Action's comprehensive roadmap to achieving 100% clean power by 2035](#).**

Thank you in advance for your consideration of our recommendations. We look forward to continuing to work with your agency and the Biden administration on advancing bold climate action at all levels of government.

Sincerely,

Clean Air Council  
 Evergreen Action  
 PA Jewish Earth Alliance  
 FracTracker Alliance  
 Project Coffeehouse  
 Fitzwater 2000  
 Conservation Voters of PA  
 Keystone Energy Efficiency Alliance  
 Protect PT  
 Mobilify Southwestern Pennsylvania  
 Breathe Project  
 PennEnvironment

Philadelphia Solar Energy Association  
 Physicians for Social Responsibility PA  
 Climate Reality Project  
 Audubon Mid-Atlantic  
 Chestnut Hill United Church  
 Pennsylvania Interfaith Power & Light  
 PennFuture  
 Working for Justice Ministry - St. Paul's  
 United Methodist Church  
 Center for Coalfield Justice  
 NRDC

