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 (CO₂) in 2021—approximately 32 percent of U.S. CO₂ emissions. Pennsylvania’s power sector is the third-dirtiest in the country, emitting nearly 80 million metric tons of CO₂ 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