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**WESTERN RESOURCE ADVOCATES’ STATEMENT TO EPA ON THE CLEAN POWER PLAN, DELIVERED JULY 29, 2014**

**Key Western States Are Close to Achieving EPA’s Carbon Reduction Goals**

“My name is Stacy Tellinghuisen. I work on energy/water issues for Western Resource Advocates, a conservation organization working to protect the West’s air, water, and landscapes, and the communities that depend on them.

If you take away one key point from my testimony today it is this:

- Western Resource Advocates has analyzed Colorado, New Mexico and Nevada’s current energy policies and finds that these three states will be very close to achieving EPA’s proposed 2030 targets. In fact, in Colorado and New Mexico, policies already in place will accomplish over 80% of what EPA’s standard requires. In Nevada, the state and main utility will have to do little if anything else to meet EPA’s proposed requirements.

Earlier this year, the U.S. released the fourth National Climate Assessment. In the Southwest, the litany of current and future impacts described in the assessment include earlier snowmelt, hotter summers, more frequent and intense droughts, increased wildfires, along with secondary impacts on human health and environmental resilience. One of the report’s key conclusions was “The Southwest is already experiencing the impacts of climate change.” For those of us living in the region, that conclusion rings true.

For these reasons, EPA’s proposed Clean Power Plan is of critical importance. Western Resource Advocates believes EPA’s proposed standards for greenhouse gas emissions from existing power plants are essential for protecting our natural resources and our health, and our Western way of life. The regulations are thoughtful, fair and rigorous, and consistent with the specific requirements of Section 111(d) of the Clean Air Act. We appreciate the work that EPA has put into developing these important regulations. While we expect to submit more specific and technical written comments to EPA at a later time, Western Resource Advocates believes the regulatory framework EPA has established is very workable, and that the regulations are on solid technical and legal footing. Moreover, we believe the regulations are doable and come at a critical time. Given the pressing nature of climate change, we urge you to maintain your proposed adoption and implementation schedule.

To further explain my opening point: In the West, many states and utilities have already been taking the initiative to advance clean energy, improve energy efficiency, and transition the most carbon-intensive power plants to cleaner sources of energy. Key stakeholders – including our utilities, state agencies, health and environmental advocates – have worked together to pursue creative, workable solutions. Those solutions have helped us meet other clean air requirements to reduce mercury, air toxics, and

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regional haze. Those solutions protect our communities' air quality and health, and have protected electricity customers from untenable rate increases. For example,

- In Colorado, the Clean Air Clean Jobs Act is allowing our state to economically transition to cleaner energy and a stronger economy;
- In Nevada, SB 123 is similarly transitioning that State from conventional coal-fired power plants to renewable energy;
- And in New Mexico, recent plans to advance the retirement of a portion of San Juan Generating Station and replace it with cleaner energy sources have similarly moved that state towards a much lower carbon footprint.

And the five Southwestern states of Arizona, Colorado, Nevada, New Mexico, and Utah all have energy efficiency programs in place to further reduce the environmental impacts of our energy needs.

These policies have put western states well on their way to meeting EPA's proposed standards. In fact, Western Resource Advocates assessed the likely emissions trajectory of three southwestern states: Colorado, Nevada, and New Mexico. These three states have taken a proactive approach to addressing environmental issues and greenhouse gas emissions, and those efforts have served them well.

Our analysis finds that, if Colorado and New Mexico simply follow through on what they are planning to do anyway under current policies, both states will accomplish over 80% of what EPA's standard requires. In Nevada, we found that by implementing current policies as already planned, the state will need to take few if any additional actions to meet EPA's standard.

**So again – if you only take one point away from my testimony today it is this:**

Western states – particularly Colorado, New Mexico, and Nevada – have proactively addressed this issue, and are well prepared to meet EPA's standard on the reasonable timeframe EPA has proposed.

While there is more to do over time in Colorado and New Mexico, as well as several of the other states in the region, our history shows that western stakeholders can and will come together to find workable, low cost and practical solutions that protect our communities, our economies, our jobs and our environment. We very much appreciate EPA's willingness to provide states with significant flexibility to comply with these regulations, in ways that make local sense.

Most importantly, EPA's proposed regulations are a vital step toward managing our greenhouse gas emissions. Reducing emissions is critical to protecting our communities, as well as the rivers, farmland, forests, and landscapes that define the West. Thank you for your important work on this issue."