

November 28, 2017

Administrator Scott Pruitt
U.S. Environmental Protection Agency
1200 Pennsylvania Ave., NW
Washington, D.C. 20460

Re: Request for Public Hearings on Proposed Repeal of Clean Power Plan
Docket ID No. EPA-HQ-OAR-2017-0355

Dear Administrator Pruitt:

The Georgetown Climate Center is a non-partisan non-profit organization that works with states to advance policies to address climate change and to share lessons from the states with federal policymakers.¹ On behalf of the states we support, we are writing to request that the Environmental Protection Agency hold at least one public hearing in Washington, DC, on the agency's proposed repeal of the Clean Power Plan, 82 Fed. Reg. 48,035 (Oct. 16, 2017).

EPA has currently scheduled a public hearing in Charleston, West Virginia, on Nov. 28 and 29, 2017. When announcing this public hearing, you stated that, "the EPA is headed to the heart of coal country to hear from those most impacted by the CPP and get their comments on the proposed Repeal Rule."² While energy producers in WV are one community that stands to be affected by the Clean Power Plan, the impacts of climate change and the actions needed to address it affect us all. From more frequent and destructive hurricanes along the Gulf and Atlantic Coasts, to drought and wildfires in the West, to more severe flooding in many regions, communities across the country are already experiencing the effects of climate change. In addition, the standards laid out in the CPP for reducing emissions, and the obligation to develop plans to implement the regulation apply to all states with power generation, and affect electricity consumed by everyone in the country.

In developing the Clean Power Plan, EPA held four two-day public hearings: in Pittsburgh, PA; Denver, CO; Atlanta, GA; and Washington, DC. This followed previous "listening sessions" and unprecedented public outreach and engagement by EPA. Furthermore, in October 2017, you promised that "any replacement rule will be done carefully, properly, and with humility, by listening to all those affected by the rule."³ In keeping with this promise, EPA should invite the same level of input on its proposal to

¹ Georgetown Climate Center, "Working with Stakeholders to Inform Federal Standards to Reduce Carbon Pollution," <http://www.georgetownclimate.org/clean-energy/working-with-stakeholders-to-inform-federal-standards-to-reduce-carbon-pollution.html>

² U.S. Environmental Protection Agency, "EPA Announces Public Hearing on Proposed Repeal of Clean Power Plan" (November 2, 2017), <https://www.epa.gov/newsreleases/epa-announces-public-hearing-proposed-repeal-clean-power-plan>

³ U.S. Environmental Protection Agency, "EPA Takes Another Step to Advance President Trump's America First Strategy, Proposes Repeal of 'Clean Power Plan'" (October 10, 2017), <https://www.epa.gov/newsreleases/epa-takes-another-step-advance-president-trumps-america-first-strategy-proposes-repeal>.

repeal the CPP that it solicited in developing the policy. The states we work with provided extensive comments to EPA in crafting the CPP, and they have important expertise on the ways that this rule would affect state energy systems and residents. Several states individually requested public hearings on the proposed repeal to be held in their states. EPA should recognize the value of their perspectives and provide another forum for them to participate.

EPA has previously argued that it is more efficient to hold hearings in Washington, DC, because of the location of EPA's headquarters and proximity to other interested stakeholders. At minimum, we respectfully request that EPA hold a hearing in Washington, DC, a location more easily accessible to more people in the country, to enable a broader set of stakeholders to participate in this important conversation.

In addition to the requested hearing in Washington, DC, we urge EPA to consider conducting additional hearings in other regions, to provide as much geographic diversity in venues as possible. There are many stakeholders—including clean energy producers, energy technology manufacturers, energy-consuming industries, residential consumers, and communities located near energy generation sources—with other interests that merit your consideration. Charleston, WV, is not an easy place for many of these stakeholders to reach, but their input should be considered in a proposal to repeal a significant federal rule of national scale and impact.

Thank you very much for your consideration.

Sincerely,

A handwritten signature in cursive script that reads "Vicki Arroyo".

Vicki Arroyo
Executive Director
Georgetown Climate Center