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U.S. Environmental Protection Agency
EPA Docket Center
Mail Code 28221T, 1200
Pennsylvania Avenue NW
Washington, DC 20460.

Docket ID No. EPA–HQ–OAR–2023–0072
New Source Performance Standards for Greenhouse Gas Emissions From New, Modified, and Reconstructed Fossil Fuel-Fired Electric Generating Units; Emission Guidelines for Greenhouse Gas Emissions From Existing Fossil Fuel-Fired Electric Generating Units; and Repeal of the Affordable Clean Energy Rule

On behalf of our more than 47,000 members, the Georgia Chamber of Commerce (Chamber) writes to express its concerns regarding the Environmental Protection Agency's (EPA) proposed Clean Air Act emission limits and guidelines for carbon dioxide from fossil fuel-fired power plants. While the Chamber supports the underlying objective of addressing climate change and reducing greenhouse gas emissions, the Chamber is concerned that the current proposals could have significant impacts on the Georgia business community and the state's overall economic growth. The proposed rule should be revised to enable Georgia's energy sector to provide cleaner energy while remaining vibrant.

Georgia has been identified by *Area Development* magazine as the number one state for business for nine consecutive years. The Chamber is Georgia's largest business advocacy organization, representing the interests of a diverse cross-section of industry and commerce across Georgia. Its primary purposes are to ensure that Georgia remains economically competitive, to develop innovative solutions to the challenges we face today, and to maintain a commitment to a high quality of life for all of Georgia's citizens through responsible economic development.

Many of the Chamber's members are involved in businesses and industries that will be directly or indirectly affected by the EPA's proposed rules. For example, the Chamber's membership includes entities involved in the construction and development, mining, housing, agriculture, manufacturing and counties, cities, and local government sectors, each of whom are critical to the vibrancy and competitiveness of Georgia's economy. As energy consumers, they will all be impacted by the proposed rule.

Energy is a critical business input. For many of Georgia's businesses and industries who compete in the global economy, energy represents a major input cost that determine both viability and profitability. Georgia's wide diversity of energy generation, including carbon-free nuclear and solar facilities, provides a competitive advantage for many Georgia industries, in large part because of the abundant and diverse supplies of affordable energy resources that are collectively keeping energy costs reasonable and supply reliable.

The proposed rule could hinder business and create economic burdens, without providing sufficient flexibility for industries to transition towards cleaner energy solutions. The Chamber's most pressing concerns include:

- Affordability and Energy Costs: The proposed rule's stringent emission reduction targets may necessitate costly upgrades and retrofitting for existing fossil fuel-fired power plants or require significant infrastructure changes over a short duration. The financial burden of these changes would be passed on to businesses and consumers, resulting in higher energy costs. For industries operating on thin profit margins, this could lead to decreased competitiveness and potential job losses.
- Reliability Concerns: A hasty transition to technology, which is not yet ready for large-scale commercial deployment, does not allow for the needed infrastructure build out and raises concerns about the reliability of the energy supply. Unreliable energy could disrupt operations for critical industries and impede their ability to serve customers effectively. Further, unreliable energy could prevent economic growth throughout the state and impede the continued development of clean technology.
- Innovation Concerns: The proposed rule could inhibit an orderly and innovative energy transition. By setting timelines that do not accurately reflect the state of technology and lead times for siting, permitting, and constructing new infrastructure, the proposed rule is likely to force investments in energy resources that are not optimally suited for meeting current and future energy demand. Suboptimal energy decisions today mean a less reliable and less efficient energy system in the future.
- Implementation Concerns: The proposed rule improperly restricts state flexibility in setting performance standards for existing fossil fuel-fired power plants and imposes timelines for developing state plans that are too short. The flexibility is important because states are in a better position than the federal government to assess the impact of regulations on its citizens. Further, the proposed rule's timelines are far too short to allow for the necessary level of analysis and public involvement to develop sound state plans tailored to each state's unique circumstances.
- Impact to Economic Growth: The proposed rule could have significant impacts on Georgia's economic development and business growth. The increased costs, decreased energy reliability, decreased flexibility in meeting energy demand, and overall stress placed on energy infrastructure likely caused by the proposed rule could all restrict the continued business development throughout the state.

Here in Georgia, we are proud to be the home of several major automotive plants. Companies are building electric vehicles of the future right here in America, but these regulations put that progress at risk. To come into compliance with new standards, companies will be forced to make significant compliance-focused investments that divert funds from investing in innovation and could lead to companies taking their manufacturing offshore, to countries with environmental standards lower than those imposed here in America.

We are committed to long-term solutions that benefit our environment, economy, and communities. The EPA's proposed rules run the risk of bringing innovation and economic development to a standstill. Rather than imposing unrealistic timelines or requiring technology not yet available for commercial deployment, EPA should be focusing on proven technology and available alternative resources, acknowledging the distinct energy needs of different geographical regions, and incentivizing research and development of advanced clean energy technologies to facilitate a smoother transition from fossil fuels, while fostering growth and competitiveness within the industry.

The Georgia Chamber of Commerce strongly recommends that the Environmental Protection Agency revise the proposed rules to ensure a balanced and orderly approach towards emission reductions while preserving the economic prosperity of the Georgia business community.

Should you need more information or have any questions, please contact our office.

Sincerely,



Chris Clark President and CEO
Georgia Chamber of Commerce