

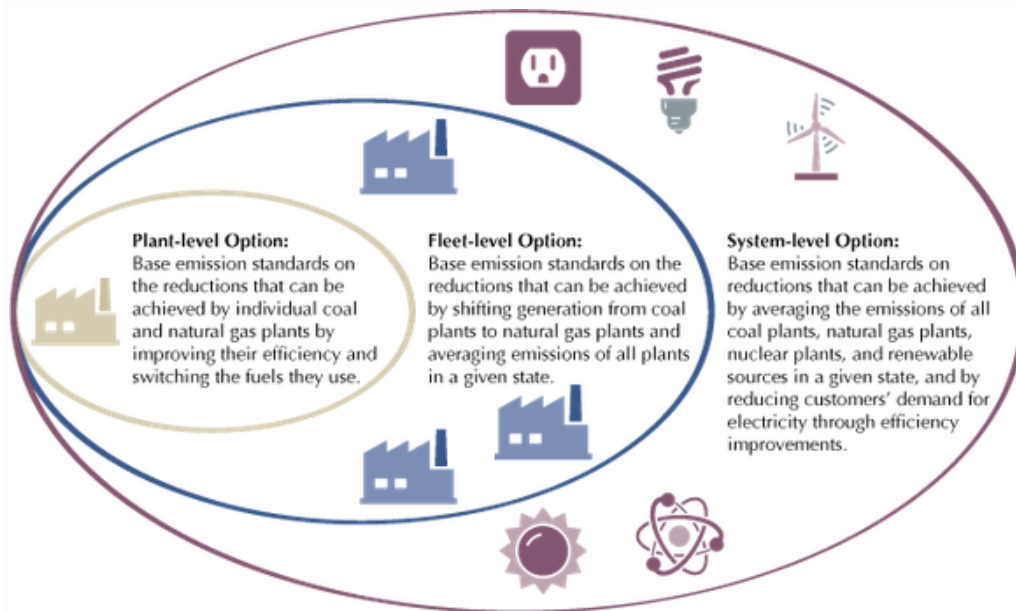
EPA's Clean Power Plan - Primer

The following article is taken largely from a [blog](#) by Dr. Stephen A. Smith, Executive Director for the [Southern Alliance for Clean Energy](#).

On June 2, the U.S. Environmental Protection Agency (EPA) released their [Clean Power Plan](#) proposal, which focuses on regulating carbon pollution from existing electric power plants under [Section 111\(d\) of the Clean Air Act](#). This proposed rule is both historic and long overdue, and is currently under evaluation with a public comment period that will last 120 days. For a quick overview of the rule, you can access EPA's fact sheets on the Clean Power Plan [here](#).



The new rule is built around Section 111 of the Clean Air Act, which uses Best System of Emission Reduction (BSER). When determining the BSER, EPA considers cost of emission reduction, technical feasibility as well as other factors. EPA had the choice of setting BSER on a plant-level basis (individual coal plants/units), a fleet-level basis (across a state's entire coal plant fleet) or a system-level basis (across all of a state's energy resources, including energy efficiency resources).



The Clean Power Plan establishes BSER as a system-level approach. Using this BSER methodology, EPA has determined four building blocks for how states can reduce their emissions system wide:

1. Increase efficiency of existing coal-fired plants
2. Increase utilization of natural gas
3. Increase utilization of renewables and nuclear
4. Increase the amount of energy efficiency

To be clear, states do not need to use each of these building blocks to comply with the Clean Power Plan. Instead, EPA has used these four building blocks as the BSER for reducing carbon pollution from existing coal-fired power plants. These four building blocks can be mixed and matched in different ways, which gives states lots of flexibility for how they want to comply with the rule as they develop their unique [State Implementation Plans](#) (SIPs). These categories were also used to determine each states' target reduction. Some states will be required to reduce emissions by as much as 50%, some states as little as 17%. These reductions are largely tied to the year 2012 baseline.

Below are the 2012 emission rates as well as the proposed EPA state emission rate goals for our Southeast states:

State	2012 emission rate (lbs/MWh)	EPA Final State Goal (lbs/MWh)	% below 2012 (Final Goal)
AL	1,444	1,059	27%
FL	1,200	740	38%
GA	1,500	834	44%
KY	2,158	1,763	18%
MS	1,130	692	39%
NC	1,646	992	40%
TN	1,903	1,163	39%
SC	1,587	772	51%
LA*	1,446	883	39%
VA*	1,297	810	38%

SACE is actively reviewing the 645 pages of the proposed rule and the supplemental support documents, and over the course of the coming months we will be providing additional info in the form of blogs, webinars, and materials for our supporters and members to better understand this important rule. SACE's initial analysis suggests that while the rule is technically sound, the goals set in the Southeast for energy efficiency and renewables are too weak. SACE will be providing detailed comments to EPA on how to strengthen these elements and we will be communicating with state governments about why we believe these will be the most economic tools for states in our region to become compliant with the rule.

For additional information on the Clean Power Plan, see the [archived webinar](#) hosted by SACE's Southeast Energy Research Attorney, Angela Garrone. This webinar provides an introduction to the proposed 111(d) regulations, explains what this means for utilities and regulators in the Southeast, and how you and your organization can be involved in the rule-making process.