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Southern Alliance for Clean Energy Comments on Proposed Repeal of Greenhouse Gas Emissions Standards for Fossil Fuel-Fired Electric Generating Units

To whom it may concern,

Thank you for the opportunity to comment on the Environmental Protection Agency's proposal to repeal greenhouse gas emissions standards for power plants.

The Southern Alliance for Clean Energy (SACE) is a nonprofit organization that has promoted responsible energy choices to ensure clean, safe, and healthy communities throughout the Southeast United States for the past 40 years.

We strongly oppose the EPA's proposal because it degrades the environment, harms people's health and wellbeing, and imposes massive costs on all Americans and people around the world that far outweigh any possible savings from lower compliance costs.

Repeal Would Kill Hundreds of Americans Per Year

EPA estimates that the proposed repeal will kill hundreds of Americans per year due to increased exposure to fine particulate matter (PM_{2.5}) and ozone pollution from power plant smokestacks. EPA calculated how many people in 2028, 2030, 2035, 2040, and 2045 would die prematurely from this exposure due to the environmental protections being repealed, and found that from 2028 to 2045 (with the exception of 2040), hundreds of premature deaths would be caused annually by repealing the environmental protections.¹

Repeal Will Saddle Americans With Billions of Dollars Per Year In Health Costs

¹ U.S. Environmental Protection Agency (June 2025). Regulatory Impact Analysis (RIA) for the Proposed Repeal of Greenhouse Gas Emissions Standards for Fossil Fuel-Fired Electric Generating Units, Table 4-1.

The proposed repeal saddles Americans with billions of dollars' worth of costs each year for health care and premature deaths caused by people's exposure to the toxic pollution that will be caused by repealing the standards.² Altogether, these health costs imposed on American households amount to \$76-130 billion over the 2026-2047 period.³

Repeal Is A Job Killer

EPA's analysis demonstrates that the repeal proposal will kill hundreds of thousands--if not millions--of job-years for construction workers in the energy sector due to the cancellation of all the clean energy projects that won't be built.⁴ The loss of construction job-years is only very slightly offset by a gain in non-construction job-years (i.e., recurring operating, maintenance, and fuel extraction jobs).⁵

Repeal Increases Electric Bills

EPA's own analysis finds that repealing the standards would raise electricity prices until the 2030s, contrary to what EPA argues to justify repealing the rules and contrary to President Trump's campaign promise to cut electricity bills in half in 12-18 months if elected. While EPA's analysis finds there to be \$10-19 billion in cost savings over a period of two decades, from 2026-2047, from energy companies not having to comply with the rules (an amount that is a small fraction of the costs imposed on the public by repeal), the savings only start to appear in the 2030s,⁶ even while the billions of dollars of health costs⁷ and tens of thousands of job losses⁸ start to rack up immediately. As with any modeling, the farther out in time the modeling goes, the more speculative it is. That means the near-term increase in costs that results from repeal is far more certain than the potential for a decrease in costs farther out in time.

Repeal Is An Outrageously Bad Deal

Comparing the increased health costs imposed on Americans as a whole against energy companies' financial savings from not having to comply with the pollution limits reveals that the costs vastly outweigh the benefits. EPA's analysis shows that over the 20-year period of 2026-2047, the

² RIA Table 4-3

³ RIA Table 4-4

⁴ RIA Table 5-4

⁵ RIA Table 5-5

⁶ RIA Table 3-7

⁷ RIA Table 4-3

⁸ RIA Table 5-4

health costs imposed on Americans by repealing the standards, amounting to \$76-\$130 billion, outweigh the compliance cost benefits of \$9.6-\$19 billion by \$67-\$110 billion. In other words, the costs that EPA proposes to impose on the public by repealing the pollution rules outweigh the benefits by 7-8 times.⁹

This analysis actually understates how bad of a value the repeal proposal is for the American public because of the instructions from President Trump to stop considering the value of climate benefits in analyses like this. EPA says in its analysis that due to President Trump's "Unleashing American Energy" executive order, "the EPA did not monetize benefits associated with CO2 emissions changes." However, before EPA was instructed to put its head in the sand, previous EPA analysis released last year demonstrated that the power plant climate pollution limits would provide \$160-470 billion in climate benefits globally over 20 years.¹⁰

Conclusion

The proposal to repeal power plant greenhouse gas emission standards can't be justified by weighing the costs and benefits. The proposal degrades the environment and shifts costs from energy companies onto everyday Americans in the form of higher health costs and lower quality of life.

It appears that the proposal is absurd except when seen in light of the Trump administration political appointees' agenda to give free reign to corporate polluters to harm people's health and the environment with impunity by sabotaging the EPA and its willingness and abilities to carry out its sole mission: to protect people and the environment.

We urge you to stop this reckless proposal.

Sincerely,

Chris Carnevale
Climate Advocacy Director
Southern Alliance for Clean Energy

⁹ RIA Table 6-2

¹⁰ U.S. Environmental Protection Agency (April 2024). Regulatory Impact Analysis for the 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, Table 4-3