November 2, 2026

U.S. Environmental Protection Agency
EPA Docket Center
Docket ID No. EPA-HQ-OAR-2025-0124,
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Southern Alliance for Clean Energy Comments on Rescission of the Greenhouse Gas Findings for Fossil Fuel-Fired Power Plants and Repeal of Regulations for Power Plant Greenhouse Gas Emissions Under Clean Air Act Section 111

To whom it may concern,

Thank you for the opportunity to comment on the Environmental Protection Agency's proposal to roll back greenhouse gas emissions standards and findings 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.

The Environmental Protection Agency (EPA) has literally one job: to protect Americans' health and environment. Americans of all stripes depend on the EPA to help ensure that we have clean air to breathe and clean water to drink so that we can stay healthy and thrive.

Power plants burning coal and gas are one of the largest sources of air pollution, including criteria pollutants, mercury and air toxics, and greenhouse gas (GHG) emissions. U.S. power plants' role in air pollution is difficult to overstate since they collectively comprise one of the largest sources of climate pollution in the world. Together, they emit more carbon dioxide

pollution than the entire national economies of nearly every country in the world, according to research by the Institute for Policy Integrity.[1]

Carbon dioxide and other greenhouse gas emissions at the scale our economy is producing them are dangerous, a fact well established in the scientific record. The authoritative 2023 National Climate Assessment states, "The increase in greenhouse gases is warming the planet and driving other observed climate trends, including increases in the frequency and severity of many types of extreme weather events [...] The impacts of climate change increase with warming, and warming is virtually certain to continue if emissions of carbon dioxide do not reach net zero (very high confidence). Rapidly reducing emissions would very likely limit future warming (very high confidence) and the associated increases in many risks (high confidence)."[2]

The summer of 2026 was the hottest summer on record across the contiguous 48 states. Kids sports got canceled, outdoor workers faced dangerous heat, and our electricity bills soared as our AC worked overtime to keep up. As hot as it was this year, it is just a preview of what could come with future climate warming. With temperatures on the rise because of pollution from burning coal, oil, and gas, tens of thousands of Americans may die from heat illness each summer by the end of the century if greenhouse gas emissions aren't dramatically reduced.[3]

EPA's mission to protect Americans' clean air is taking on even more importance as the massive surge in electric demand from artificial intelligence data centers prompts coal plants to run past planned retirement dates, a building spree of gas burning power plants, and the use of tens of thousands of onsite combustion generators.[4] This fossil-powered load growth is taking one of the world's largest sources of greenhouse gas emissions and supercharging it.

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[1] Peter H. Howard and Jason A. Schwartz, Institute for Policy Integrity at New York University School of Law (May 2025). "The Scale of Significance: Power Plants–The U.S. Power Sector's Annual Climate Pollution Causes Thousands of Deaths and Massive Economic Damage." https://policyintegrity.org/files/publications/Power_Sector_GHG_Contribution_Issue_Brief_vF.pdf

[2] Marvel, K., W. Su, R. Delgado, S. Aarons, A. Chatterjee, M.E. Garcia, Z. Hausfather, K. Hayhoe, D.A. Hence, E.B. Jewett, A. Robel, D. Singh, A. Tripati, and R.S. Vose, U.S. Global Change Research Program (2023). "Fifth National Climate Assessment." Chapter 2 https://nca5.climate.us/chapter/2

[3] Meredith Bailey, University of Washington School of Public Health (July 29, 2020). "A warming climate may lead to dramatic increase in US deaths due to heat exposure, study shows." https://sph.washington.edu/news-events/news/warming-climate-may-lead-dramatic-increase-us-deaths-due-heat-exposure-study-shows

[4] As of the date of this letter, Cleanview reports 18,127 behind-the-meter turbines, engines and fuel cells for fuel cells under development and operating across the nation. https://cleanview.co/products/behind-the-meter-tracker

The current growth in electricity demand, largely due to data centers, is resulting in the fastest growth of electricity usage since the 1960s, according to research by Grid Strategies.[5] Their 2025 analysis reported that nationwide electricity usage is projected to increase by 32% between 2025 and 2030, while certain areas with clusters of data center development are facing much higher growth rates like 67% in Georgia Power's service territory. The construction wave of new fuel-burning power plants combined with behind-the-meter diesel and gas generators is building a pollution bomb that will be hitting residents in the coming years.

Against this backdrop of power plants being a large and growing source of greenhouse gas emissions, and those emissions posing serious risks to people's health, it's almost incomprehensible that the EPA would make its current proposal to strip your own agency's ability to limit power plant pollution that causes climate change. The EPA's attempted justifications of arguing that greenhouse gas emissions from power plants aren't in fact air pollution that endangers public health or welfare, and that eliminating climate pollution from power plants wouldn't make any real difference, is totally contradicted by reality.

We at SACE submitted comments last year to EPA on the proposal to repeal greenhouse gas emissions standards for fossil fuel-fired electric generating units (Docket ID No. EPA-HQ-OAR-2025-0124), and in our letter we outlined how eliminating power plant GHG standards would kill hundreds of Americans per year, saddle the public with billions of dollars in health costs each year, eliminate jobs, and increase everyone's electric bills.[6] Those concerns still stand, and the current proposal only doubles down on those risks and seeks to put up a legal barrier for future administrations who may try to fix these mistakes.

EPA's proposal is also not supported by the American people. Americans across the political spectrum are strongly supportive of more and stronger federal limits on air pollution. According to recent polling by the AP-NORC Center for Public Affairs Research, seven Americans support the federal government enforcing strict clean air and water regulations for every one person who is opposed.[7] When pollsters asked people the opposite–if the federal government should roll back environmental regulations–two people were opposed for every one person in favor.

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[5] John D. Wilson, Sophie Meyer, Zach Zimmerman, and Rob Gramlich, Grid Strategies (November 2025). "Power Demand Forecasts Revised Up for Third Year Running, Led by Data Centers." https://gridstrategiesllc.com/wp-content/uploads/Grid-Strategies-National-Load-Growth-Report-2025.pdf

[6] Chris Carnevale, Southern Alliance for Clean Energy (August 7, 2025). Docket ID No. EPA-HQ-OAR-2025-0124, Comment ID EPA-HQ-OAR-2025-0124-1164, "Southern Alliance for Clean Energy Comments on Proposed Repeal of Greenhouse Gas Emissions Standards for Fossil Fuel-Fired Electric Generating Units." https://www.regulations.gov/comment/EPA-HQ-OAR-2025-0124-1164

[7] AP-NORC (September 16, 2026). "Americans are increasingly concerned about the environmental consequences of AI." https://apnorc.org/projects/americans-are-increasingly-concerned-about-the-environmental-consequences-of-ai/

EPA is failing in its job to protect public health and the environment, and it appears that this move by EPA is simply the continuation of a deregulatory agenda to prioritize corporate polluters' profits over the American people's health and wellbeing.

We urge you to abandon this reckless proposal.

Sincerely,

Chris Carnevale
Climate Advocacy Director
Southern Alliance for Clean Energy