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## ACSF Supports EPA's Clean Power Plan, Calls For Greater Reliance on Fuel Switching and Renewable Power

In comments filed today with the Environmental Protection Agency (EPA), the American Clean Skies Foundation (ACSF) supported the agency's proposed Carbon Pollution Emission Guidelines for Existing Stationary Sources, also known as the Clean Power Plan.

ACSF said that EPA's proposal to systematically reduce harmful greenhouse gas (GHG) emissions from existing power plants by at least 30% from 2005 levels was urgently needed and provides a workable set of guidelines for states to follow in developing more detailed pollution reduction measures. However, ACSF's comments urge EPA to more thoroughly consider the ability of natural gas–fired facilities to achieve significant emission reductions at existing power plant locations. For example, ACSF noted that over 20 GW of new highly efficient natural gas combined-cycle (NGCC) plants and over 12 GW of coal-to-gas boiler conversions have already been completed or announced. (Site-by-site details are provided in exhibits to the comments.)

ACSF stressed that greater reliance on gas-fired power under the Clean Power Plan would place a greater responsibility on natural gas producers and pipeline operators to mitigate fugitive emissions of methane across the supply chain so that the full fuel cycle GHG reductions from fuel switching (e.g. gas-for-coal) are as large as possible.

ACSF's comments also asked EPA to consider additional means of promoting renewable electricity. Flexible market-based approaches to supplying renewable power, such as green tariffs, shared renewable programs, and direct access measures, could provide states with important options for meeting emission reduction goals while reducing the GHG reduction burden on fossil fuel power plants.

Gregory C. Staple, the CEO of the American Clean Skies Foundation, said: "The EPA could strengthen its Clean Power Plan and accelerate emission reductions by more fully considering the ability of generators to re-power sites with natural gas-fired facilities without impairing grid reliability. We think the EPA also should encourage more market-driven programs to leverage the scope for renewable power to drive down harmful emissions."

ACSF's comments to EPA are available here: http://bit.ly/1ttCFBW

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Established in 2007, the American Clean Skies Foundation is a 501(c)(3) not-for-profit organization that seeks to advance the country's energy security and promote a cleaner, low-carbon environment through expanded use of natural gas, renewables and efficiency.