

# *The 60 Plus Association*

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**Kill the Death Tax. Protect Social Security. Energy Security.**

*James L. Martin*  
Chairman

*Amy N. Frederick*  
President

*Rep. Roger Zion (R-IN, 1967-75)*  
Honorary Chairman

*Pat Boone*  
National Spokesman

Submitted via Regulations.Gov

May 9, 2014

Docket ID EPA-HQ-OAR-2013-0495

Administrator Gina McCarthy  
U.S. EPA, Mail Code 2822T  
1200 Pennsylvania Avenue NW  
Washington, DC 20460

Dear Administrator McCarthy:

60 Plus respectfully submits comments on the re-proposed National Standards of Performance for Greenhouse Gas Emissions from New Stationary Sources: Electric Utility Generating Units published January 8, 2014 (79 FR 1430).

60 Plus represents 7.2 million senior citizens.

As we learned this past winter, the United States electrical energy infrastructure was stretched to the brink...and the projected shuttering of additional coal plants as a result of EPA regulations is going to make things even worse. Of special concern to me, and the seniors I represent, is the continued and artificially high price of electricity most Americans are still paying. Any increase in the price of electricity or natural gas is harmful to the seniors. Seniors on fixed or diminishing incomes especially pay a disproportionate share of their modest income for utilities, and I believe our nation ought to take every reasonable step within its power to enhance our supply of safe and secure energy. This approach includes preserving and growing the contribution of coal-based electricity... the surest and most reliable way to deflate electricity prices. As you know, Madame Administrator, during times of brutal cold and heat, tragedies abound of people dying in their homes, unable to pay their utility bill. These Americans are nearly always the elderly. Surely you can understand that promoting, not destroying, projects that create an abundance of reliable electric generating capacity for our nation is critical to America's seniors.

We strongly oppose the rule for several reasons:

1. The existing EPA rules are already driving up the costs of natural gas and electricity prices. The new rule will add more unacceptable costs.

An article on April 29, 2014 provided a bleak picture of our future under EPA regulations:

<http://dailycaller.com/2014/04/29/epa-regulations-set-to-increase-natural-gas-prices-by-150-percent/>

Excerpt:

*Environmental Protection Agency policies resulting in the shutdown of coal-fired power plants will contribute to a 150 percent price hike for natural gas, accompanied by a 7 percent rise in electricity prices, according to government data.*

*The U.S. Energy Information Administration (EIA) projects that the accelerating rate of coal plant retirements will cause natural gas prices to rise from \$3.44 per million British thermal units (Btu) in 2012 to \$5.91 per million Btu in 2025. This would boost retail electricity rates for households and businesses from 9.8 cents per kilowatt-hour to 10.5 cents per kilowatt-hour — a 7 percent price jump by 2025.*

*Gas and power prices are driven even higher by 2040 as more coal plants are shuttered. Natural gas prices will increase 150 percent over 2012 levels and retail power prices will rise 22 percent over 2012 levels as more coal plants are retired.*

As you know, there is a real cost in lives when the cost of energy rises. EPA has used the calculation of one life lost for every \$10M in lost disposable income.

2. The requirement for new Electric Generating Units (EGUs) to use carbon capture and sequestration (CCS) is not a viable technology and threatens to further erode the economic viability and reliability of our electrical grid.

The 2014 National Climate Assessment on the status of carbon capture technology released by the U.S Global Change Research Program on May 6, 2014 stated:

“Although the potential opportunities [for CCS] are large, many uncertainties remain, including cost, demonstration at scale, environmental impacts, and what constitutes a safe, long-term geologic repository for sequestering carbon dioxide.”

Without an economic commercially available technology, no new coal plants will be built to replace the shuttered plants or to expand capacity.

3. The science justification for the new rule is flawed.

On March 19, 2014, the Senate Committee on Environment and Public Works Minority issued the report:

[“EPA’s Playbook Unveiled: A Story of Fraud, Deceit, and Secret Science”](#)

This report documents the extremely disturbing 20 year saga of the use of severely flawed particulate matter (PM) and ozone science. This is the same science that was crucial in the 2009 Endangerment Finding and the 2010 / 2013 Social Cost of Carbon. This science has been used to justify this rule

The House Science, Space and Technology Committee conducted a thorough two year investigation of the use of secret science by EPA that resulted in an August 2013 subpoena of you.

<http://science.house.gov/press-release/smith-subpoenas-epa-s-secret-science>

Excerpt:

**Chairman Smith:** “In September 2011, the EPA’s then-Assistant Administrator Gina McCarthy committed to make the data sets available to the Committee. Even though Ms. McCarthy now leads the agency, she has yet to provide the promised data to the Committee.

*“This subpoena could have been avoided. Unfortunately, we’ve been put in this position by an agency that willfully disregards congressional requests and makes its rules using undisclosed data. After two years of failing to respond, it’s clear that the EPA is not going to give the American people what they deserve—the truth about regulations.*

*“The EPA should not base its regulations on secret data. By denying the Committee’s request, the agency prevents Congress from fulfilling its oversight responsibilities and denies the American people the ability to verify EPA’s claims. The EPA’s lack of cooperation contributes to the suspicion that the data sets do not support the agency’s actions. The American people deserve all of the facts and have a right to know whether the EPA is using good science.”*

In your March 2014 response, you admitted that EPA does not have the data.

<http://science.house.gov/sites/republicans.science.house.gov/files/documents/EPA%20letter%20to%20Smith%20March%207%202014%20%282%29.pdf>

How can EPA continue to hide behind secret science for new regulations like the current proposal? The answer is clear; you must withdraw the current proposal and now re-propose every regulation or finding that used the secret science.

4. The application of the new standard will establish an unacceptable precedent for existing EGUs.

Thank you,



James L. Martin  
Chairman  
60 Plus Association

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*The 60 Plus Association is a 20-year-old nonpartisan organization working for death tax repeal, saving Social Security and Medicare, affordable prescription drugs, lowering energy costs and other issues featuring a limited government, less taxes approach as well as a strict adherence to the Constitution. 60 Plus calls on support from over 7 million citizen activists. 60 Plus publishes a newsletter, SENIOR VOICE, and a Scorecard, bestowing awards on lawmakers of both parties who vote “pro-senior.” 60 Plus has been called “an increasingly influential senior citizen’s group” and the acknowledged alternative to AARP.*