



November 21, 2014

Air and Radiation Docket and Information Center
U.S. Environmental Protection Agency
Mail Code: 2822T
1200 Pennsylvania Ave., NW
Washington DC, 20460

**Re: Carbon Emission Guidelines for Existing Stationary Sources:
Electric Utility Generating Units;
Docket ID No. EPA-HQ-OAR-2013-0602;**

The Ohio Manufacturers' Association (OMA) is hereby providing its written comments to U.S. EPA's "Carbon Pollution Emission Guidelines for Existing Stationary Sources: Electric Utility Generating Unit." OMA is dedicated to protecting and growing manufacturing in Ohio, and for more than 100 years, has supported reasonable, necessary, and transparent environmental regulations promoting the health and well-being of Ohio's citizens.

The OMA, as a trade organization representing over 1,400 manufacturers throughout Ohio, appreciates the opportunity to weigh in on the approach set forth by U.S. EPA in its proposed Carbon Pollution Emission Guidelines for Existing Stationary Sources: Electric Utility Generating Units, also known as the Clean Power Plan ("CPP"). Access to abundant, affordable, and reliable energy is helping to spur a manufacturing renaissance in Ohio and powering an economic rebound in Ohio. In order to continue its manufacturing growth Ohio's manufacturers need policies that support the continued provision of affordable electricity.

U.S. EPA should abandon the current CPP plan, which appears impractical and based on flawed interpretations of the Clean Air Act. Instead the OMA and its members encourage U.S. EPA to reconsider its current plan and outline a more reasonable path forward that supports Ohio jobs and its economy by allowing all energy sources to play a role in America's energy future.

Consumers of energy, whether large manufacturers or an individual households, benefit most from an all-of-the-above energy strategy. Diversity of energy supply is not only critical in keeping energy costs reasonable, it is essential in ensuring steady and reliable streams of energy to power factories and heat homes. If regulations like CPP force energy options off the table, energy prices will become more volatile, costs will increase, reliability will be threatened and ultimately U.S. firms will be less competitive.

By moving forward with the CPP, U.S. EPA by its own estimates would raise electricity prices between 6% and 7% in 2020 and up to 12% in some locations. An independent analysis shows that the impacts on energy prices could be substantially higher. An analysis by NERA Economic Consulting indicated that average U.S. electricity prices would increase by 12% per year and the total costs of the rule could be between \$366 billion to \$479 billion over a 15 year timeframe.¹

There is a direct correlation between the cost of energy and manufacturing output. A study conducted by Cleveland State University found that an increase in the industrial electricity price of 1% kilowatt-hour is likely, in 99% of cases, to decrease average manufacturing productivity on average, by \$2,527 of annual gross state product per employee. The research indicates that a 1% increase in industrial electricity prices drops manufacturing productivity by 0.13%.² Thus, electricity prices increased by the CPP will have a significant effect on the gross state product of Ohio.

The OMA is concerned that the CPP expands the EPA's 40-year mandate as the preeminent regulator of the environment to become the nation's regulator of energy. The proposed rule dictates not only what types of fuel should be used to generate our nation's electricity, but how and in what quantities end-users should consume it.

The OMA urges the U.S. EPA to reconsider its proposal and proceed with a more reasonable, legal and technically sound plan.

¹ NERA Economic Consulting, Potential Energy Impacts of the EPA Proposed Clean Power Plan, October 2014. Available at: http://www.americaspower.org/sites/default/files/NERA_CPP%20Report_Final_Oct%202014.pdf

² Cleveland State University, Moving Ohio Manufacturing Forward: Competitive Electricity Pricing, October 2014 at ii. Available at: http://www.ohiomfg.com/wp-content/uploads/2014_11_20_CSU_Moving-Ohio-Mnf-Forward_2013.pdf