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June 6, 2024

The Honorable Shelley Moore Capito  
Ranking Member  
Committee on Environment & Public Works  
U.S. Senate  
Washington, DC 20510

***Re: S.J. Res. 92, Congressional Review Act, Resolution of Disapproval on EPA's Clean Power Plan 2.0***

Dear Ranking Member Capito:

One hundred percent of IECA's membership are manufacturing companies who require reliable and affordable electric generation to compete globally, reshore jobs, increase investments, and jobs. EPA's Clean Power Plan 2.0 is inconsistent with reliability and affordability, at least until cleaner dispatchable electric power alternatives become commercial over the next decade or more. The manufacturing sector consumes 25 percent of U.S. electricity, employs 13 million people, or about 11 percent of the work force, and contributes \$2.8 trillion to the GDP.

Electricity and natural gas reliability is the cornerstone of the U.S. economy. Without energy reliability, we become a third world economy. The manufacturing sector operates 623,066 facilities, most of which operate 24/7 and require reliable power that is affordable and dispatchable. Any fluctuation in power quality can damage manufacturing equipment and products, which can easily cost millions of dollars per day per facility and threatens employee safety.

**Consumers are impacted by electricity price inflation.**

Electricity costs have increased 24.8 percent over the last three years, which is an increase of \$116 billion, while demand was relatively flat (see Figure 1). In April 2024, the annualized 12-month electricity inflation price index increased 5.1 percent and continues to outpace the Consumer Price Index by 50 percent, according to the Bureau of Labor Statistics. The overall CPI index increased by 3.4 percent.<sup>1</sup>

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<sup>1</sup> Consumer Price Index Summary, U.S. Bureau of Labor Statistics, <https://www.bls.gov/news.release/cpi.nr0.htm>

### EPA's Clean Power Plan 2.0.

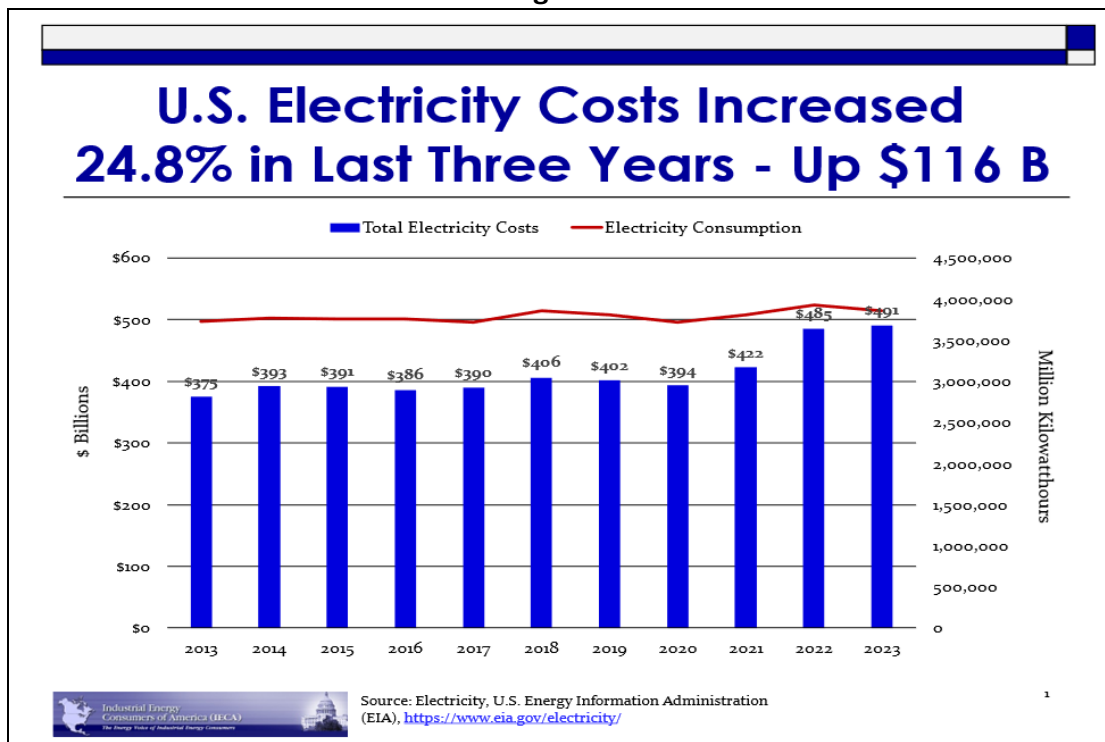
The EPA's Clean Power Plan 2.0 rule would negatively impact grid reliability, disrupt manufacturing operations, supply chains, and national security. Grid reliability is already under siege. The FERC and NERC have released multiple reports over the last two years citing the seriousness of an already deteriorating grid reliability.

The EPA rule would result in the premature shutdown of fossil fired power generation facilities that consumers would still pay for in electric bills, further increasing electricity costs for homeowners, farmers, and manufacturing companies alike.

The EPA rule has especially serious implications to the manufacturing sector because we are always the first to be curtailed when the grid has reliability issues. All of the costs imposed on electric generators of the rule are passed on to us, directly impacting our ability to compete in global markets, with countries like China.

The EPA's assessment of the readiness and economics of technology options such as CCS and hydrogen are not grounded in commercial or economic realism.

Figure 1



Thank you for your leadership on this important matter.

Sincerely,

Paul N. Cicio

*Paul N. Cicio*

President & CEO

cc: U.S. Senate

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*The Industrial Energy Consumers of America is a nonpartisan association of leading manufacturing companies with \$1.3 trillion in annual sales, over 12,000 facilities nationwide, and with more than 1.9 million employees worldwide. It is an organization created to promote the interests of manufacturing companies through advocacy and collaboration for which the availability, use and cost of energy, power or feedstock play a significant role in their ability to compete in domestic and world markets. IECA membership represents a diverse set of industries including: chemicals, plastics, steel, iron ore, aluminum, paper, food processing, fertilizer, insulation, glass, industrial gases, pharmaceutical, consumer goods, building products, automotive, independent oil refining, and cement.*