



1050 Connecticut Avenue, NW, Suite 500 • Washington, D.C. 20036
Telephone (202) 223-1420 • www.ieca-us.org

August 7, 2025

U.S. Environmental Protection Agency
EPA Docket Center, Docket ID No. EPA-HQ-OAR-2025-0124
Mail Code 28221T
1200 Pennsylvania Avenue NW
Washington, DC 20460

Re: Repeal of Greenhouse Gas Emissions Standards for Fossil Fuel-Fired Electric Generating Units, Docket ID No. EPA-HQ-OAR-2025-0124

Thank you for the opportunity to comment on this rule.

Industrial Energy Consumers of America (IECA)

IECA 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. One hundred percent of IECA members are manufacturing companies whose competitiveness is largely determined by the cost and reliability of natural gas and electricity. IECA's sole mission is to reduce and avoid energy costs and increase energy reliability through advocacy in Congress and regulatory agencies, such as the Federal Energy Regulatory Commission (FERC). 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.

Comments in Support of Repealing the Rule

The rule would force the premature retirement of coal and some natural gas-fired power generation plants. The rule did not consider electricity grid reliability and its impact to public welfare, the competitiveness of the manufacturing sector and job impacts, or national security.

The EPA did not consider the critical importance of ensuring the nation has an abundant supply of dispatchable power for purposes of reliability. The combined natural gas and coal generation make up the largest supply of dispatchable power. EPA never consulted with the Federal Energy Regulatory Commission and the North American Electricity Reliability Corporation (NERC) to determine the implications to reliability if the rule resulted in the shutdown of these important generation assets. As we speak, FERC/NERC have issued numerous reports that

illustrate that the U.S. grid is unreliable because of a lack of dispatchable generation capacity. FERC/NERC state that the grid is teetering on the brink of collapse.

IECA supports all-of-the-above electric generation. Affordability and reliability are essential to our manufacturing sector, which competes globally and is price sensitive. That said, most of the large manufacturing facilities operate 24/7 and require dispatchable power. EPA never considered impacts to manufacturing jobs. Manufacturers cannot rely on non-dispatchable power.

EPA did not consider the competitiveness and resulting economic impact of the rule on the manufacturing sector, which employs 13 million people.

The manufacturing sector consumes about 25 percent of U.S. electricity, which is a significant amount. EPA models cannot determine the relationship between higher electricity prices due to the rule and its impact to the competitiveness of the various manufacturing sectors. Competitiveness with another country's manufacturing sector changes constantly. Therefore, EPA's cost-benefit analysis under weights costs. Higher costs resulting from the rule threatens the competitiveness of the majority of the energy-intensive trade-exposed industries (EITE). EITE industries consume about 80 percent of all the energy of the U.S. manufacturing sector.

Carbon capture technology is not economic or a widely applicable technology solution.

EPA did not adequately examine the commercial viability of the technology. Plus, regarding applicability, few coal-fired generation units are located in parts of the country that have access to sequestration geology.

Sincerely,

Paul N. Cicio

Paul N. Cicio

President & CEO