Clean Power Plan vs. Affordable Clean Energy Rule

In June 2019 the Trump Administration proposed the Affordable Clean Energy rule as a replacement for the 2015 Clean Power Plan introduced by the Obama Administration to tackle carbon emissions from power plants. The Clean Power Plan set more aggressive pollution reduction goals while also projected more health and climate benefits than the Affordable Clean Energy rule.

A comparison of benefits and goals is detailed below:

CLEAN POWER PLAN (CPP)	AFFORDABLE CLEAN ENERGY RULE (ACE)
Power Plant Emissions	
CPP would cut carbon pollution from power sector by 32 percent. [EPA, CPP by the Numbers, <u>8/3/15]</u>	ACE would reduce power plant emissions by 1.5 percent. [EPA, <u>8/21/18]</u>
Premature Deaths	
CPP would prevent up to 4,500 premature deaths per year. [Washington Post, <u>11/1/17]</u>	ACE would increase premature deaths by 1,400 per year. [New York Times, <u>8/21/18]</u>
Health Impacts	
CPP would avoid projected 90,000 asthma attacks in children, 1,700 heart attacks, and avoid 300,000 missed school and work days. [EPA, CPP by the Numbers, <u>8/3/15</u>]	ACE would increase number of new cases of exacerbated asthma by 48,000; increase number of missed school days by 21,000. [New York Times, <u>8/21/18]</u>
Pollution Reduction	
CPP would reduce SO2 pollution by 90 percent; NOx by 72 percent. [EPA, CPP by the Numbers, <u>8/3/15</u>]	ACE increases SO2 and NO X emissions in 20 states plus DC. [Environmental Research Letters, 4/9/19]
Health Benefits	
CPP estimated as much as \$54 billion in health savings per year in 2030. [EPA, CPP by the Numbers, <u>8/3/15]</u>	EPA projected ACE would have annual net climate and health benefits of up to \$730 million. [EPA, 6/19/19]
State Goals	
EPA set state goals with mandatory reductions by 2022. [EPA, CPP by the Numbers, <u>8/3/15]</u>	ACE does not set specific greenhouse gas emissions cuts for each state. [Washington Post, <u>6/19/19]</u>
Public Input	
CPP received 4.3 million public comments before it was finalized. [EPA, CPP by the Numbers, 8/3/15]	ACE rule received 500,000 public comments before it was finalized. [EPA ACE Fact Sheet, June 2019]

CPP vs ACE Comparison

EMISSION GOALS

» CPP

CPP Would Cut Carbon Pollution From The Power Sector By 32 Percent. According to a 2015 EPA fact sheet, "When the Clean Power Plan is fully in place in 2030, carbon pollution from the power sector will be 32 percent below 2005 levels – or 870 million tons less carbon pollution – securing progress and making sure it continues." [EPA, CPP by the Numbers, <u>8/3/15</u>]

» ACE

ACE Would Reduce Power Plant Emissions By

1.5 Percent By 2030. According to Vox, "The EPA is still required to regulate greenhouse gases, but the CPP's new replacement, the Affordable Clean Energy (ACE) rule, is drastically weaker. The ACE rule would lower power sector emissions by 11 million tons by 2030, or between 0.7 percent and 1.5 percent. The EPA noted that long-term industry trends are expected to still push emissions down 35 percent, but that's largely independent of the ACE rule." [Vox, 6/19/19]

EPA: "ACE Rule Could Reduce 2030 CO2

Emissions By Up To 1.5%. "According to EPA, "EPA estimates that the ACE Rule could reduce 2030 CO2 emissions by up to 1.5% from projected levels without the CPP." [EPA, <u>8/21/18</u>]

PREMATURE DEATHS

» CPP

Trump EPA Analysis Said CPP Would Save 4,500 Premature Deaths Per Year. According to the EPA, "A sweeping Obama-era climate rule could prevent up to 4,500 premature deaths per year by 2030, the Trump administration has found in its analysis of the plan, projecting that the plan could save more lives than the Obama administration said it would. The Trump administration's Environmental Protection Agency is moving to repeal the plan." [Washington Post, <u>11/1/17</u>]

» ACE ACE Could Result In 1,400 Premature

Deaths. According to the New York Times, "The administration's own analysis, however, revealed on Tuesday that the new rules could also lead to as many as 1,400 premature deaths annually by 2030 from an increase in the extremely fine particulate matter that is linked to heart and lung disease, up to 15,000 new cases of upper respiratory problems, a rise in bronchitis, and tens of thousands of missed school days." [New York Times, <u>8/21/18</u>]

EPA Predicted The Possibility Of An Extra Eight To 25 Deaths A Year Under ACE. According to the New York Times, "The E.P.A.'s analysis of the new Trump administration plan does include premature death calculations based on studies that are considered less comprehensive than the Six Cities study. Those analyses start at the possibility of an extra eight to 25 deaths a year under Mr. Trump's climate plan." [New York Times, <u>8/21/18</u>]

Assistant EPA Director Called Increased Deaths Under CPP "Collateral Effects." According to the New York Times, "Mr. Wehrum acknowledged Tuesday that there would be 'collateral effects' on traditional pollutants compared to what the Clean Power Plan might have achieved. But, he said, 'We have abundant legal authority to deal with those other pollutants directly, and we have aggressive programs in place that directly target emissions of those pollutants." [New York Times, <u>8/21/18</u>]

HEALTH IMPACTS

» CPP

Clean Power Plan Would Avoid Projected 90,000 Asthma Attacks In Children. [EPA, CPP by the Numbers, <u>8/3/15</u>] *Clean Power Plan Would Avoid Projected 1,700 Heart Attacks.* [EPA, CPP by the Numbers, <u>8/3/15</u>]

Clean Power Plan Would Avoid Projected 1,700 Hospital Admissions. [EPA, CPP by the Numbers, 8/3/15]

Clean Power Plan Would Avoid Projected 300,000 Missed School And Work Days. [EPA, CPP by the Numbers, <u>8/3/15</u>]

» ACE

ACE Would Increase Cases "Exacerbated

Asthma" By 48,000. According to the New York Times, "The Trump administration analysis also found that its plan would see 48,000 new cases of what it described as "exacerbated asthma," and at least 21,000 new missed days of school annually by 2030 because of an increase of pollutants in the atmosphere." [New York Times, 8/21/18]

ACE Would Increase Number Of Missed School Days By 21,000. [New York Times, <u>8/21/18]</u>

HEALTH BENEFITS

» CPP

Clean Power Plan Estimated As Much As \$54 Billion In Health Savings Per Year In 2030.

According to a 2015 EPA fact sheet, "The Clean Power Plan has public health and climate benefits worth an estimated \$34 billion to \$54 billion per year in 2030, far outweighing the costs of \$8.4 billion." [EPA, CPP by the Numbers, <u>8/3/15</u>]

Under CPP Families Would See \$4 In Health Benefits For Very \$1 Invested. According to a 2015 EPA fact sheet, "From the soot and smog reductions alone, for every dollar invested through the Clean Power Plan – American families will see up to \$4 in health benefits." [EPA, CPP by the Numbers, 8/3/15]

EPA: "Clean Power Plan Will Reduce Pollutants That Contribute To The Soot And Smog That Make People Sick By Over 20 Percent In 2030."

According to a 2015 EPA fact sheet, "The Clean Power Plan will reduce pollutants that contribute to the soot and smog that make people sick by over 20 percent in 2030. 318,000 tons of sulfur dioxide. 282,000 tons of nitrogen dioxide." [EPA, CPP by the Numbers, <u>8/3/15</u>]

» ACE

EPA Projected Ace Would Have Annual Net Climate And Health Benefits Of Up To \$730

Million. According to EPA, "EPA projects that ACE will result in annual net benefits of \$120 million to \$730 million, including costs, domestic climate benefits, and health co-benefits." [EPA, <u>6/19/19</u>]

POLLUTION REDUCTION

» CPP

CPP Would Reduce SO2 Pollution By 90 Percent; NOx By 72 Percent. According to a 2015 EPA fact sheet, "The transition to cleaner sources of energy will better protect Americans from other harmful air pollution, too. By 2030, emissions of SO2 from power plants will be 90 percent lower compared to 2005 levels, and emissions of NOx will be 72 percent lower." [EPA, CPP by the Numbers, <u>8/3/15</u>]

» ACE

ACE Rule Would Increase CO2, SO2, And NOX

Emissions. According to Environmental Research Letters, "As a result, the ACE only modestly reduces national power sector CO2 emissions and increases CO2 emissions by up to 8.7% in 18 states plus the District of Columbia in 2030 compared to no policy. We also find that the ACE increases SO2 and NO X emissions in 19 states and 20 states plus DC, respectively, in 2030 compared to no policy, with implications for air quality and public health." [Environmental Research Letters, <u>4/9/19</u>] ACE Cut Carbon Emissions By Less Than Half Of What Experts Say Is Needed. According to the

Washington Post, "Despite a drumbeat of scientific warnings, the Trump administration Wednesday issued a new rule that cuts carbon emissions from power plants by less than half of what experts say is needed to avoid catastrophic global warming." [Washington Post, <u>6/19/19</u>]

PUBLIC INPUT

» CPP

CPP Received 4.3 Million Public Comments

Before It Was Finalized. According to a 2015 EPA fact sheet, "The plan takes into account the unprecedented input we received through numerous outreach efforts, including the 4.3 million comments that were submitted to the agency during the 6-month public comment period." [EPA, CPP by the Numbers, 8/3/15]

» ACE

ACE Rule Received 500,000 Public Comments

Before It Was Finalized. According to the EPA, "The ACE proposal – which EPA issued in August 2018 – received 500,000 public comments and more than 200 people provided oral testimony at an October 1, 2018, public hearing in Chicago." [EPA ACE Fact Sheet, accessed <u>7/12/19</u>]

STATE GOALS

» CPP

EPA Set State Goals With Mandatory Reductions

By 2022. According to the EPA, "States and utilities will have 15 years to meet the final goals by 2030. Investment can begin now, with the period for mandatory reductions beginning in 2022." [EPA, CPP by the Numbers, <u>8/3/15</u>]

» ACE

Washington Post: "The New Rule Does Not Set Specific Greenhouse Gas Emissions Cuts For Each State." According to the Washington Post, "Unlike the Obama administration's 2015 Clean Power Plan, the new rule does not set specific greenhouse gas emissions cuts for each state. Instead, it allows state regulators to determine how utilities can improve efficiency and will not force companies to switch from coal to lower-carbon energy sources." [Washington Post, 6/19/19]