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Contact: Laura Tierney
Email: ltierney@bcse.org
Office: 202.785.0507

Business & Energy Leaders Urge Clean Power Plan to Use Clean Energy Portfolio for Compliance

Washington, DC - The Business Council for Sustainable Energy (BCSE) released the following statement from BCSE President Lisa Jacobson regarding its submission of comments to the U.S. Environmental Protection Agency (EPA) on the proposed Federal Plan and Model Rules under the Clean Power Plan regulating carbon emissions from existing power plants:

"The Federal Plan, like any state compliance plan, can best achieve the goals of the Clean Power Plan by harnessing the vast potential of the wide range of clean energy technologies – renewable energy, energy efficiency and natural gas – to improve reliability of the U.S. electricity grid, increase flexibility, and produce energy savings, as well as reduce emissions.

"BCSE believes that a properly designed Federal Plan can help those states that are not able to submit a compliance plan to move toward a more diverse, affordable, and clean energy portfolio that meets the Clean Power Plan's emissions reduction targets. In addition, the Federal Plan can serve as guidance to states in developing their own plans and as a temporary or partial plan where state compliance development may be delayed or may not address all issues."

BCSE highlighted the following recommendations in its comments to EPA:

- The Federal Plan should adopt a "trade ready" approach in either a mass-based or rate-based plan, and should consider market-based elements to ensure cost effective compliance.
- The Federal Plan should allow the full portfolio of clean energy technologies and resources to be utilized for compliance planning. This includes rate-payer and non-rate payer programs and actions.
- If the Federal Plan allocates or auctions allowances under its plan, it should provide allowance value to clean energy technologies and resources to spur further investment and provide clean energy market signals.
- The Federal Plan should take steps to effectively control leakage under all compliance pathways.

"The Clean Power Plan also offers a great opportunity for constructive partnership and dialogue between state policy-makers and the private sector, with clear opportunities to explore state-specific or multi-state options for compliance. The Business Council for Sustainable Energy and its members are committed to helping states adapt clean energy solutions to each state's unique requirements.

"The Council looks forward to working with the EPA in the coming months to finalize the full Clean Power Plan and to share the views of clean energy industries with state policymakers."

Please see the comments BCSE submitted to EPA [here](#).

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The Business Council for Sustainable Energy (BCSE) is a coalition of companies and trade associations from the energy efficiency, natural gas and renewable energy sectors, and also includes independent electric power producers, investor-owned utilities, public power and commercial end-users. Established in 1992, the Council advocates for policies that expand the use of commercially-available clean energy technologies, products and services. For more information on the Council, please visit: www.bcse.org and download [Sustainable Energy in America Factbook](#) 2015 edition for the latest industry information.