

South Carolina Energy Coalition Principles

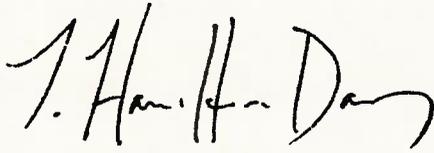
Together the State Energy Coalition Workgroup presents the following principles to the United States Environmental Protection Agency (EPA) as key factors to consider when developing the Greenhouse Gas (GHG) performance standards for new and existing sources. The Coalition encourages the EPA to:

- 1) Ensure a common sense approach in the development of federal rules by allowing all stakeholders to be engaged in federal rulemaking, and when possible, enable stakeholders to have a 'seat at the table' in developing national policy.
- 2) Provide maximum flexibility in the approach to the development and implementation of federal GHG rules at the state level. This flexibility should consider other electric system operational issues that may conflict with GHG goals. For example, the power industry does not need the GHG rule to mandate its dispatch processes.
- 3) Ensure that the federal GHG rule and the State Implementation Plan (SIP) include a process to assess and implement solutions to potential electric system reliability impacts which may result from the compliance design and requirements for this GHG rule.
- 4) Allow the states to develop a program/strategy that relies on meaningful and cost-effective, system-wide GHG emission reductions, which meet the federal GHG reduction objectives (e.g. Determine a baseline system and a reduction goal by some future time period.) The program/strategy could be based on state-wide or region-wide effort.
- 5) Identify resources and tools to enable states and regions to determine and implement the best strategies to meet the needs of its power generation, economy, and citizens.
- 6) Provide clear, legally-defensible GHG reduction objectives such that state plans which meet these objectives would withstand legal scrutiny.
- 7) Provide sufficient timeframe to allow for the adequate development of state plans (under CAA Section 111(d)) to include the 18-month timeline for state rulemaking laws and additional federal requirements for public notice and comment.
- 8) Recognize that South Carolina is ranked high among states for clean energy use (5th) and Leadership in Energy and Environmental Design (LEED) for building space per capita (top 10).¹ Credit should be available in the Emissions Guidance for existing and future state initiatives achieving quantifiable reductions through, for example, energy efficiency, demand response, pollution controls, lower emitting fuels, renewable energy, and clean energy investments, specifically nuclear capacity.
- 9) Understand South Carolina's unique economic challenges. For example, South Carolinians are 50% more likely to live below the poverty line.² In some months, many state residents can spend 60-80% of income on energy and South Carolina ranks 7th in cooling degree days per year.³ While ensuring a safe, secure, and predictable energy future, EPA should recognize individual state characteristics and not place undue economic hardships on its citizens, businesses, manufacturing or industrial sectors.

¹ South Carolina Chamber of Commerce, Fact Sheet-Energy, April 6, 2012.

² U.S. Census Data, 2011.

³ Central Electric Power Cooperative, Inc., "Appliance Saturation Survey, 2008."



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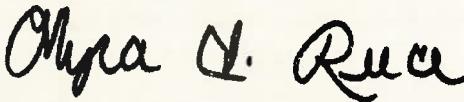
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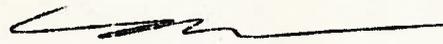
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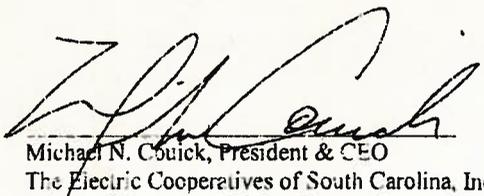
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