



October 30, 2018

Environmental Protection Agency  
1200 Pennsylvania Avenue, NW  
Washington, DC 20460

RE: EPA Docket No. EPA-HQ-OAR-2017-0355 - Affordable Clean Energy Rule

The American Chemical Society (ACS), the world's largest scientific society, is concerned about the impact of the proposed Affordable Clean Energy Rule on climate and public health. The proposed rule could contribute to degradation of both climate and health when compared to the status quo, the Clean Power Plan (CPP).

ACS believes that U.S. government policies should encourage the market to incorporate the full lifecycle cost of energy sources into their prices. The Affordable Clean Energy plan will, according to the EPA's own Regulatory Impact Analysis<sup>1</sup>, lead to as many as 1,400 premature deaths annually by 2030 due to increased emissions from coal power plants. As consideration of the Affordable Clean Energy plan continues, ACS calls on EPA to weigh thoroughly the environmental and health costs of all energy sources.

ACS also supports the U.S. government taking meaningful steps to reduce greenhouse gas (GHG) emissions. The Affordable Clean Energy Rule, by its own estimate, could lead to an increase in GHG emissions, which will compound the consequences of climate change such as sea level rise, extreme weather events, and degradation of ecosystems and natural resources. The recent Intergovernmental Panel on Climate Change report "Global Warming of 1.5° C" highlights the negative consequences of even modest increases in temperature on global climate and public health. In order to mitigate these consequences, the Affordable Clean Energy Plan should dramatically curb emissions beyond what is currently proposed. Accurately evaluating the full costs of failing to curb emissions will make the need for continuing efforts to minimize carbon emissions clear.

ACS thanks you for considering these comments. For further recommendations, please see the attached ACS policy statements on Energy Policy and Climate.

Respectfully Submitted,  
Caroline Trupp Gil  
ACS Director for Federal Relations

---

<sup>1</sup> [https://www.epa.gov/sites/production/files/2018-08/documents/utilities\\_ria\\_proposed\\_ace\\_2018-08.pdf](https://www.epa.gov/sites/production/files/2018-08/documents/utilities_ria_proposed_ace_2018-08.pdf)