



PHIL BRYANT
GOVERNOR

July 23, 2015

The Honorable Regina McCarthy
Administrator of the Environmental Protection Agency
William Jefferson Clinton Building
1200 Pennsylvania Avenue, NW
Washington, DC 20460

Dear Madam Administrator:

I write to express my administration's concerns regarding the development of State Implementation Plans ("SIPs") to comply with the Environmental Protection Agency's ("EPA") June 2014 proposal for reducing carbon dioxide emissions from existing power plants. Please understand that the concerns expressed herein are shared not only by my administration, but also by the Mississippi Legislature, as reflected in the attached Senate Concurrent Resolution adopted in April of this year.

Although I am writing you in my capacity as Governor, my concerns are also informed by my experience as chairman of both the Southern States Energy Board and the Interstate Oil and Gas Compact Commission. In my experience with these organizations, I witnessed first-hand the damage that can result from overreaching federal regulatory programs.

The flaws inherent in EPA's proposal make the development of responsible SIPs unworkable for states, including Mississippi. Many of our concerns with the proposal stem from EPA's decision to proceed without considering or understanding Mississippi's energy markets and infrastructure needs, and without recognizing Mississippi's past achievements in reduction of greenhouse gas emissions.

Essentially, EPA's proposal amounts to an unfunded mandate, requiring Mississippi to invest substantial amounts to obtain and implement new technology without allowing the state adequate time to prepare. Moreover, EPA's proposal establishes emissions targets for Mississippi that are more stringent than those applied to most other states.

STATE OF MISSISSIPPI • OFFICE OF THE GOVERNOR

POST OFFICE BOX 139 • JACKSON, MISSISSIPPI 39205 • TELEPHONE: (601) 359-3150 • FAX: (601) 359-3741 • www.governorbryant.com

The Honorable Regina McCarthy
July 23, 2015
Page 2 of 2

Further, not only does the proposal fail to credit Mississippi for early reductions in carbon dioxide emissions, but it also penalizes states, including Mississippi, that took early action to invest in and support nuclear power.

EPA's plan not only assumes unmatched future growth in natural gas fueled power plants and distribution infrastructure, but it would also force energy exporting states to shut down coal-fueled power plants. This scenario would seriously threaten the reliability of Mississippi's electricity-generating infrastructure, especially during seasons of extreme weather. We believe it is profoundly irresponsible to gamble with the reliability of Mississippi's electrical grid or those of other states.

Also of great concern to us are cost increases on Mississippians and others around the country. While the increase in energy costs for job creators and employers poses an immediate threat to an already weakened economy, forcing cost increases on low-income families and senior citizens, those who can least afford it, is cruel and dangerous. In light of the high cost of EPA's proposal, not only to Mississippi's economy, but also to its most vulnerable citizens, any environmental benefits that may result from implementation of EPA's proposal – which studies have shown to be negligible – cannot be justified.

Madam Administrator, we do not see how it will be possible to reasonably develop a State Implementation Plan, given the burdensome requirements of EPA's proposal in its current form. One of my most important duties as Governor is to secure reliable access to affordable electricity for Mississippians. I am deeply concerned that the current form of EPA's proposal could prevent me from fulfilling this duty.

Sincerely,



Governor Phil Bryant

cc: Gary C. Rikard