

## Testimony re: Rescission of the Greenhouse Gas Findings for Fossil Fuel-Fired Power Plants and Repeal of Regulations for Power Plant Greenhouse Gas Emissions Under Clean Air Act Section 111

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My name is Noha Haggag, and I am a Senior Attorney with the Environmental Defense Fund testifying on behalf of our millions of members impacted by climate pollution. EDF strongly opposes EPA's reckless abandonment of all greenhouse gas standards for fossil fuel-fired power plants.

Section 111 of the Clean Air Act requires that EPA set standards for sources that significantly contribute to air pollution that endangers human health and welfare. Extensive peer-reviewed science confirms that greenhouse gas emissions from the power sector endanger the public health and welfare of current and future generations. While EPA claims these emissions have little impact, this unfounded assertion ignores that the US power sector is the second largest source of greenhouse gases in the country — accounting for a quarter of emissions — and one of the largest sources of greenhouse gases in the world. EPA has issued countless rules under section 111 for source categories that emit smaller amounts of pollution. US power sector greenhouse gas emissions are significant by any measure under section 111.

EPA's recent Final Rule repealing carbon standards for existing coal and new gas plants shows that a partial repeal will result in massive increases of air pollution, including 400 to 500 million metric tons of carbon in 2035 alone, 2040 alone, and 2045 alone. This pollution carries real costs — including dangerous heat, drought, wildfires, hurricanes, and rising home-insurance and health-care bills.

These climate impacts are already happening. Heat exposure alone sends more than 67,000 people to emergency departments in an average year.<sup>1</sup> And from 2008 to 2020, the annual rate of heat-related emergency visits rose by nearly 3 percent each year.<sup>2</sup>

Families are also paying in other ways. In parts of California, insurers have stopped writing new policies because wildfire risk has grown so much.<sup>3</sup> In Florida and Louisiana, insurers have become insolvent as hurricanes have become more costly.<sup>4</sup> In addition, utility customers are paying to repair and harden damaged energy infrastructure and to cool their homes as hotter summers drive up electricity use.<sup>5</sup>

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<sup>1</sup> Climate Central, *Climate Change Raises Rates of U.S. Emergency Room Visits for Heat Illness* (Sept. 2026), <https://www.climatecentral.org/climate-matters/heat-illness-emergency-room-visits>.

<sup>2</sup> Dring et al., *Emergency Department Visits for Heat-Related Emergency Conditions in the United States from 2008-2020*, *International Journal of Environmental Research and Public Health* (2022), <https://www.mdpi.com/1660-4601/19/22/14781>.

<sup>3</sup> See Insurance Journal, *State Farm's California Halt Reflects Overall Poor Underwriting Experience, Ratings Agency Says* (May 31, 2023), <https://www.insurancejournal.com/news/west/2023/05/31/723138.htm> (; Sierra Sun, *State Farm joins other companies who will no longer insure new homeowner policies* (June 9, 2023), <https://www.sierrasun.com/news/state-farm-joins-other-companies-who-will-no-longer-insure-new-homeowner-policies/>).

<sup>4</sup> See *Storm-Driven Insurer Insolvencies Stir State Actions: Explained*, Bloomberg Law (Dec. 29, 2022), <https://www.ftortreform.com/news/storm-driven-insurer-insolvencies-stir-state-actions-explained/>; Insurance Information Institute, *Louisiana's Insurance Crisis: Trends & Insights* (Feb. 1, 2026) <https://beinsure.com/news/louisianas-insurers-paid-23bn-hurricane/>

<sup>5</sup> Federation of American Scientists, *Economic Impacts of Extreme Heat: Energy* (Apr. 2025), <https://fas.org/publication/economic-impacts-of-extreme-heat-energy/>; National Energy Assistance Directors Association, *Summer Residential Cooling Outlook* (June 2026), <https://neada.org/wp-content/uploads/2026/06/NEADA-CEPC-Summer-Cooling-Update.pdf>.

The repeal will also result in increased soot, smog, and acid rain. EPA's own scientific assessments link these pollutants to premature death, respiratory disease, asthma attacks, and cancer risks. EPA has not quantified how these emissions increases would translate into harms for Americans. EPA estimated in its 2024 rule that the carbon standards would deliver 370 billion dollars in climate and health benefits through 2047, while preventing thousands of asthma attacks and hospital visits.<sup>6</sup> This is far more than EPA's estimated compliance-cost savings from the recent Final Repeal.

The estimated benefits from the 2024 rule are now likely underestimates given the administration's efforts to expand coal- and gas-fired generation, thus allowing for additional increases in emissions that could have been abated. These efforts include directing coal plants to stay open past their planned retirement dates and exempting them from clean-air rules, while simultaneously blocking hundreds of wind and solar projects and rolling back other important federal protections.

Using the data in the recent Final Rule, EDF estimates that the partial repeal would lead to more than one trillion dollars in additional health costs, more than 80,000 additional premature deaths, and more than \$1.7 trillion in cumulative climate-related harms through 2047.<sup>7</sup>

The science and data makes clear that EPA's proposed action will result in devastating loss. EDF categorically denounces EPA's flagrant disregard for human life and public welfare.

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<sup>6</sup> EPA, Fact Sheet – Carbon Pollution Standards for Fossil Fuel-Fired Power Plants Final Rule at 2 (April 2024), <https://www.epa.gov/system/files/documents/2024-04/cps-111-fact-sheet-overview.pdf>.

<sup>7</sup> EDF, Trump EPA Repeal of Power Plant Pollution Standards: More Deaths, Illness, and Health Costs (Sept. 2026), [https://library.edf.org/AssetLink/v4t7wt5t7d3u060fwb2y6t5d75483yd1.pdf?\\_gl=1\\*657mcb\\*\\_gcl\\_au\\*ODc1OTkxMTI0LjE3OTA4NDU1MjE.\\*\\_ga\\*NDk1MzAyNjE5LjE3OTA4NDU1MjE.\\*\\_ga\\_2B3856Y9QW\\*cze3OTA4NDU1MjAkbzEkZzAkdDE3OTA4NDU1MjMkajU3JGwwJGgw](https://library.edf.org/AssetLink/v4t7wt5t7d3u060fwb2y6t5d75483yd1.pdf?_gl=1*657mcb*_gcl_au*ODc1OTkxMTI0LjE3OTA4NDU1MjE.*_ga*NDk1MzAyNjE5LjE3OTA4NDU1MjE.*_ga_2B3856Y9QW*cze3OTA4NDU1MjAkbzEkZzAkdDE3OTA4NDU1MjMkajU3JGwwJGgw)