Good afternoon. My name is Guy Runco. I am an International Representative with the International Brotherhood of Electrical Workers, “the IBEW”.

I live in Pueblo, Colorado and work all over the state of Colorado. Before I became an International Representative, in the 70’s and 80’s I worked for Centel Electric, a Utility company in Southern Colorado that is now Black Hills, Colorado. I worked in the Utility industry for 13 years as a Substation Electrician, working in both substations and power plants in Southern Colorado.

In 1987 I became the Business Manager of IBEW Local 667, representing Electric Utility workers in Southern Colorado and continued to do this for 12 years. In 1999, I became an International Representative for the IBEW, representing electrical workers across the IBEW 8th District and I continue in that position today.
On behalf of the IBEW members in the entire IBEW 8th District which consist of the states of Idaho, Montana, Wyoming, Utah, and Colorado, I thank you for this opportunity to testify.

The IBEW in conjunction with Unions for Jobs and Environmental Progress estimate the EPA’s proposed Clean Power Rule will result in the loss of 52,000 permanent direct jobs by 2020 due to coal fired power plant closures and the loss of 167,000 total direct and indirect jobs. The job loss is not limited to positions in the plants that will close, jobs in coal-fired power plants, or jobs in the communities closely surrounding these plants. These jobs are in the railroad, mining, electrical, and service industries. These jobs are all highly-skilled, high-paying jobs, in rural communities all across Colorado, Idaho, Montana, Utah, and Wyoming, areas that do not have comparable employment opportunities.

In the 8th District, across the states of Colorado, Idaho, Montana, Utah and Wyoming there are countless communities that are totally reliant on the jobs created by Coal fired power plants, places like Delta Utah, Wheatland Wyoming, Colstrip Montana and Craig Colorado. In all of these communities the power plant jobs and all of the related service jobs that are created by an operational coal fired power plant are absolutely essential to the economy, not only of the towns themselves but the surrounding communities!
There is no doubt that the job loss caused by the Clean Power Plan will have a devastating effect on these communities, communities that are still experiencing record unemployment rates. If this plan moves forward as it is written, there is no doubt that it will be at an extremely high cost for the states of Colorado, Idaho, Montana, Utah and Wyoming, in both terms of jobs lost, communities impacted and electric utility rates raised.

Job loss will be accompanying generation loss. The EPA reports the Clean Power Plan will lead to the closure of over 40 gigawatts of coal-fired generating capacity by 2020. This is the equivalent of Colorado, Nevada, Utah, and Wyoming ALL losing power ENTIRELY. Due to the nature of the rule, the exact plant closures and gigawatts that will be lost remains unknown and difficult to assess until states have finalized implementation plans which will not be for several years.

The Clean Power Plan closures will be in addition to those our area has already seen as a result of other EPA regulations, like the most recent, the Mercury and Air Toxics Standard. Almost half of the US coal-fired power plants will close by the time the Clean Power Plan is fully implemented. Renewable energy - solar and wind are not prepared to make up for this great loss of electrical grid stability.
Natural Gas is also not ready to bridge the gap left by the US coal-fired fleet closures. EPA's proposal for increasing the use of natural gas combined cycle units, in addition to the 40 Gigawatts of new natural gas combined cycle capacity that EPA projects to come on-line from 2020 to 2030, will lead to significant increases in natural gas prices well above EPA's projections. This is assuming that all of the permitting for new plants is even approved and the plants are constructed, the IBEW remains skeptical these plants will even come online as the EPA predicts.

Increasing electricity demand coupled with decreased supply is a recipe for skyrocketing electricity prices that will be passed directly on to consumers. Our area has already seen increased costs due to renewable standards and MATS associated plant closures – our communities and consumers cannot afford another round of EPA-related plant closures. In Colorado we are already seeing the effects of recent coal fired plant closures, job losses and increased electric utility rates are a reality to the citizens of this state. The increased electric rates have a terrible effect on all of the rate payers but even more so, on the elderly and the working class, those that can least afford to pay. Increased rates also inhibit new industry and job creation.
The IBEW has several recommendations for an improved Clean Power Plan:

- Provide credit to states that have already reduced carbon emissions to help meet EPA targets
- Delay the implementation of Clean Power Plan to give states and utilities adequate time to implement compliance strategies and share those strategies with the public for comment
- Demand a global climate change plan that brings developing nations like China and India to the table. Both nations’ share of global emissions is growing every year. Without global commitment to fighting climate change, EPA regulations will bring no net benefit.

Thank you for this opportunity to testify, the IBEW looks forward to working with you toward a climate change solution that keeps the best interests of consumers, workers, and the environment in mind. Unfortunately, the Clean Power Plan is not that solution.