



# Clean Power Plan

## Public Comment Summary

Updated December 3, 2015

Colorado is engaging with the public to develop a plan to meet the carbon dioxide emission reduction targets of the federal Clean Power Plan. Colorado will forward its initial submittal to the U.S. EPA by September 2016 and its final state plan by September 2018.

### Public meetings

Public meetings on the Clean Power Plan are announced on the Air Pollution Control Division's website at [www.colorado.gov/cdphe/CleanPowerPlan](http://www.colorado.gov/cdphe/CleanPowerPlan). CDPHE held public meetings to seek input about the plan on September 25, 2015 in Denver and November 9, 2015 in Durango. The Colorado Energy Office hosted an energy efficiency workshop on October 23, 2015, at the National Renewable Energy Laboratory in Golden.

CDPHE is hosting additional public meetings on January 14 in Commerce City and January 27 in Brush, CO. CDPHE will host approximately one public meeting per month from February to June, 2016. The CDPHE Air Pollution Control Division will present its draft initial submittal to the Air Quality Control Commission in approximately July 2016, and will solicit public comment on the initial submittal.

### Public comments

CDPHE has received more than 50 oral and written comments on the Clean Power Plan from individuals and organizations. The comments have expressed broad support and some opposition to the plan and have covered a range of topics. In addition, Colorado has received about 340 comments in support of the Clean Power Plan as part of an email campaign.

### What we have heard

Some of the more common themes and topics presented to CDPHE include:

- Colorado should collaborate with all parties and the public.
- Colorado should reach out to low income and rural communities.
- Consider the economic impact on rate payers and consumers.
- Colorado has already made significant reductions and is on track to meet its goal.
- Consider the potential for job losses and job gains.
- Rely more on renewable energy, less on fossil fuels.
- Incorporate demand side management and energy efficiency practices.
- Utilize more solar and more distributed energy systems.

## What we are soliciting comment on

CDPHE wants public input on all aspects of the Clean Power Plan. At this time, we are soliciting information about the following topics:

- The Clean Energy Incentive Program (CEIP), which encourages early energy efficiency measures in low income communities and early wind and solar projects. Among other things, comments could address
  - Eligibility for incentives
  - The size of the incentives
  - Additional ways to incentivize early action, separate from the federal CEIP
- Whether Colorado should adopt a mass-based or rate-based plan, and how to implement each type of plan
  - How to allocate mass-based emission allowances, particularly when an electric generating unit (EGU) retires early or switches from coal to natural gas
  - The potential for “leakage” (generally speaking, leakage means utilizing new natural gas EGUs instead of existing units that must comply with the Clean Power Plan)
  - Whether to address leakage by subjecting new power plants to the Clean Power Plan, setting aside allowances for existing natural gas EGUs and for renewables, or some other means
  - The generation of Emission Rate Credits (ERCs)
  - Evaluation, measurement, and verification of energy efficiency and renewable energy
- Emissions trading
- Future growth in electric demand
- Electric grid reliability and transmission capacity
- How to minimize costs and electric bills, especially for low income consumers
- The health and economic benefits of reducing emissions
- Tools to model the electric grid and power plant emissions

## Next steps

In addition to the upcoming public meetings, CDPHE continues to meet with key stakeholders about specific issues. In December 2015, the Center for the New Energy Economy expects to release a tool prepared by Energy Strategies to screen compliance scenarios. Colorado is participating in the Energy Strategies tool and is evaluating additional options for modeling the electric grid and the costs of potential emission reduction strategies. Colorado will submit comments on EPA’s proposed federal plan and model trading rules by January 21, 2016.

Anyone who wishes to submit comments or contact the Division about the Clean Power Plan should email [cdphe.commentsapcd@state.co.us](mailto:cdphe.commentsapcd@state.co.us).

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