**FAQ’s: Next Steps and the End of EPA’s Existing Plants Public Comment Period**

**Introduction**: December 1 is the last day to submit comments to the EPA on their 111(d) proposal. With that deadline just around the corner, the below FAQ’s are designed to help you better understand and communicate what that deadline means and what happens next.

**What happens on December 1?**

* The public comment period on the EPA’s proposed GHG regulation targeting existing power plants will close on December 1. The EPA’s initial comment deadline was set for October 16. The deadline was extended by 45 days after many federal and state officials pushed for more time to comment.

**What have electric cooperatives done to maximize the number of comments we generated?**

* After learning more about the proposal and what it would mean for their electric bills, more than 1.1 million people took the time and energy to submit comments to the EPA through [www.action.coop](http://www.action.coop) and [www.tellEPA.com](http://www.tellEPA.com). Some of the many ways co-ops boosted awareness and encouraged people to stand up and speak out included:
  + Writing a letter to the editor in local papers to raise awareness;
  + Implementing aggressive earned media strategies focused on the impact of the EPA proposal on American families and businesses served by electric co-ops;
  + Conducting paid media buys using online, print, radio, and TV ads;
  + Sending a letter to co-op employees and member-consumers;
  + Asking members to fill out a Comment card at annual meetings;
  + Adding a link to action.coop on the co-op website;
  + Including a sign-up table at local festivals and fairs;
  + Urging members to fill out a Comment card when they paid their bill.

**So the EPA’s public comment period closes on December 1.  What happens next?**

* The EPA plans to finalize their proposal and issue a finalized rule in June 2015. Between now and then, EPA will review the comments they received and host meetings with stakeholders (including co-ops). Throughout this period, expect numerous congressional hearings on both sides of the Hill.
* Because of the way the EPA crafted their proposal, states are responsible for developing plans to comply. After the public comment period closes on December 1, some of the spotlight of the EPA proposal will shift to the states. Starting in January, expect state legislatures to consider resolutions that influence how their state will deal with the EPA proposal. But that doesn’t mean that the battle has left Washington, DC. Quite the contrary – until June of next year we’ll need to keep the pressure on both state and federal arenas as EPA works towards a final rule. Continue your grassroots and communications efforts with a focus on federal and state regulators and lawmakers.

**This rule will inevitably be litigated.  How long will that process last?**

* That’s exactly right – this rule is unreasonable, unworkable, and unfair. It will certainly be litigated for years to come. After the finalized rule is issued, interested parties have 60 days to file litigation and Congress has 60 legislative days to undertake a Congressional Review Act legislative veto of the proposal.
* If litigation is filed, a DC circuit court ruling in would take approximately 18 months. If that ruling is appealed to the Supreme Court, we’d likely see a Supreme Court ruling roughly 18 months after that.

**Will all of these comments actually change the EPA's mind?**

* With more than 1.1 million comments, there is an inherent strength in the number of comments submitted to the EPA by America’s Electric Cooperatives. These comments highlight the broad opposition to this proposal and encourage the EPA to go back to the drawing board and work with us on common-sense solutions. Every comment submitted through Action.coop or TellEPA.com enhanced the strength of that message. Our comments frame the debate and demonstrate broad opposition to this rule not just to the EPA, but also to other decision makers and opinion leaders who can influence EPA’s thinking.

**What happens to Action.coop after December 1st?**

* Action.coop will stay open for business. After December 1, Action.coop will receive a facelift and become the advocacy hub for America’s Electric Cooperatives. Here, advocates will be able to join our growing grassroots army, contact their elected officials, receive future advocacy alerts, and learn more about the issues impacting electric cooperatives.

**Should we continue collecting Action.coop comment cards?**

* Yes. However once the comment period closes, we will no longer be able to send comments to the EPA on their existing power plant proposal. If a member or advocate fills out an action.coop card we will add them to the growing grassroots army at the new action.coop.