**Key Messages for Public Hearings on EPA’s Proposed Federal Plan
to Implement the Clean Power Plan**

* EPA has characterized its public hearings as “unprecedented listing sessions.” But the agency has repeatedly ignored calls from the nation’s rural electric co-ops for common-sense safeguards to ensure affordability and reliability.
* The Clean Power Plan goes far beyond what the Clean Air Act authorizes the EPA to do and will seriously challenge our nation’s electric system. Therefore, we and 39 generation and transmission co-ops have asked the U.S. Court of Appeals for the D.C. Circuit to intervene and recognize the lack of legal authority behind the EPA’s regulation.
* The CPP will have severe and adverse impacts on millions of American families and businesses.  EPA’s CPP will usher in a new era of increased electric bills and will handcuff rural economies across the nation.  The hardest hit by the regulation will be those who can least afford to pay more to keep the lights on – those living on fixed incomes or in poverty.
* America’s electric cooperatives will also be hit particularly hard.  The forced shut down of co-op power plants before their financial obligations are met means co-op member-owners will be paying twice for their electricity: once for the shuttered plant and again for power from somewhere else.
* The U.S. Congress is poised to approve resolutions that would overturn the Clean Power Plan.  Passage of this bipartisan legislation sends yet another clear message that a majority in Congress believe EPA’s climate plan is fatally flawed.
* EPA has dramatically underestimated the Clean Power Plan’s cost to small utilities. The flexibility and other mechanisms designed to reduce costs are not viable for small electric co-ops.
* The EPA’s Clean Power Plan poses a serious threat to the reliability of the nation’s electric grid. Officials responsible for ensuring the reliability of the electric power system have raised concerns about the plan. The North American Electric Reliability Corporation has said that “constructing the resource additions, as well as the expected transmission enhancements, may represent a significant reliability challenge given the constrained time period for implementation.”