



United States Environmental Protection Agency
Hearing on Proposed 111(d) Regulations
Relating to Greenhouse Gas Emissions from Existing Power Plants
Denver, Colorado, July 29, 2014

TESTIMONY OF JEROME TINIANOW
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Good afternoon. I'm Jerry Tinianow, Denver's Chief Sustainability Officer. On behalf of our Mayor, Michael B. Hancock, I want to welcome you to Denver, and thank you for the time and effort you are investing to gather public input.

The following testimony is a partial expression of our views. Denver will be filing written comments on the proposed regulations separately. We are still gathering input on two issues:

Do these regulations take the nation far enough, fast enough?

Does Colorado get sufficient credit for the steps it has already taken to reduce its carbon footprint.

Despite the fact that we are still formulating our position on these two issues, there are several points we can make today.

First, our city government accepts the science behind rapid climate change, including the significant contributions of human society to that change. We recently released our first climate change adaptation plan; at nearly 100 pages long it's among the most comprehensive issued by any major American city. If we did not accept the science of climate change, we would not have felt the need to develop such a plan.

Second, we agree that preventing the worst effects of rapid climate change requires serious efforts that go beyond mere straight-line extensions of current initiatives.

Cities clearly have a major role to play. We're proud of the steps that Denver has taken to do at least its fair share, and to inspire others. We were one of the first cities to sign the Mayors' Climate Protection Agreement, in 2005; one of the first to adopt a climate action plan, in 2007; and one of the first to sign on to the President's Better Buildings Challenge. We are among the top ten American cities for Energy Star buildings and solar power generating capacity; we are 11th in overall energy efficiency among major cities studied by the ACEEE. We have already reduced our per capita greenhouse gas emissions below 1990 levels, and we are pursuing a goal to reduce absolute emissions below that level by 2020, despite population growth of nearly 2.5% annually.

City actions such as these are important, but cities cannot solve this problem without strong national leadership. We regret that Congress has failed to provide such leadership, but we are grateful that President Obama has acted decisively by releasing his proposed regulations.

We support the assignment of reductions on a state-by-state basis without mandating specific plant-by-plant reductions. We also support the flexibility inherent in providing states with multiple options for achieving their required reductions, and the ability to band together in multi-state groups to work jointly on meeting aggregated reduction goals.

This support reflects a general preference for market-based approaches that we apply in many areas of sustainability. The success of cap and trade in reducing acid rain is beyond dispute. We note that many of the arguments levied at the current proposed regulations were levied in similar fashion during the acid rain debate. The track record of experience under the acid rain regulations, however, has established that those arguments were not justified. They were not justified then, and they are not justified now.

While we are still considering the propriety of Colorado's allocation of reduction responsibility, we are confident that, whatever the final number is, Colorado will do well under the market-based approach taken by these regulations. We are a community of innovators, blessed by the presence of the National Renewable Energy Laboratory and the talent it has attracted to this region. The proposed regulations will undoubtedly provide an

economic benefit to the Denver area, and provide added impetus to the many initiatives we are already pursuing to reduce in absolute terms the greenhouse gas emissions from our activities and choices.

Let me close by thanking you once again for your time, your effort and your patience today and tomorrow. We look forward to completing the presentation of our views through our supplemental written comments.