

BARRIERS AND SOLUTIONS: STRATEGIES FOR EFFECTIVELY LEVERAGING ENERGY EFFICIENCY AS AN ENVIRONMENTAL COMPLIANCE TOOL

A RESOURCE PAPER SERIES FOR SOUTHEASTERN STAKEHOLDERS

PROJECT OBJECTIVE

The objective of this project is to develop targeted information and resources for southeastern stakeholders that chart a path forward for inclusion of energy efficiency as a compliance strategy for EPA’s proposed Clean Power Plan and other air pollution and environmental regulations.

CHALLENGES TO INCLUDING ENERGY EFFICIENCY IN COMPLIANCE EFFORTS

Energy efficiency is widely recognized as a cost-effective opportunity to reduce air pollution from electric generation units (EGUs) at fossil fuel-fired power plants. However, since the release of the EPA’s Clean Power Plan draft rule in June 2014, southeastern states and utilities have voiced concerns regarding a number of barriers and challenges to the use of efficiency as a pollution control strategy within state compliance plans, both under existing air programs and forthcoming regulations under the final Clean Power Plan (expected release in late 2015). This project will seek to identify resources, strategies and solutions to help states and utilities address these barriers.

SEEA’S POSITION ON EPA’S PROPOSED CLEAN POWER PLAN

SEEA does not take a position on whether EPA has the authority to or should regulate greenhouse gas emissions from existing sources. If these regulations move forward and include “outside of the fence line” compliance options, SEEA is focused on working with states, utilities and other key stakeholders to support energy efficiency as a least-cost, multi-pollutant resource and compliance pathway—where appropriate and cost-effective—to build a stronger, more vibrant Southeast.

In addition to the paper series, SEEA maintains a southeastern-focused 111(d) web portal, which includes the following resources:

- A compendium of key themes and takeaways from southeastern stakeholder comments;
- A regularly updated listing of regionally relevant comments;
- A regional Clean Power Plan primer;
- A listing of relevant Clean Power Plan-related news from the Southeast and beyond;
- A collection of external tools and resources;
- A state-by-state activity tracker; and
- State-specific fact sheets.

Access to the full web portal is available at <http://goo.gl/WmPS5s>.

RESOURCE PAPER THEMES AND FOCUSES

Throughout the research and draft development process, SEEA will engage with and seek feedback from key regional stakeholders and national experts. SEEA recognizes that the final Clean Power Plan has not yet been released by the EPA, and that there are many unknowns until final guidelines are released. While specific themes and focuses may evolve as this project progresses, the following papers are currently planned:

Topic Area	Identified Barrier or Concern	Resource Paper General Description
State Agency Authority	Whether state air agencies have the authority to include energy efficiency programs within a state compliance plan	A Survey of Southeast State Air Agency Authorizing Statutes and Enforcement Structures
Energy Efficiency Program Ramp-Up Rates	How to identify and evaluate factors that influence energy-efficiency program ramp-up rates	Energy Efficiency Program Ramp-Up Rates in the Southeastern Context
Regional, Quasi-Regional/ Quasi-Multi-State, and Single-State Plans	How to evaluate approaches for incorporating energy efficiency programs across state lines within multi-state plans, and how to include multi-state program elements and agreements within single-state plans	Regional Planning Issues and Considerations for Energy Efficiency Programs Within State Compliance Plans
Reliability and Adequacy Benefits of Energy Efficiency	The potential impacts of energy efficiency on power supply and grid reliability	Summary of Recent Research Regarding Energy Efficiency Program Impacts on Reliability and Power Supply
Technical and Planning Resources	Whether state air agencies have the resources necessary to conduct modeling, find consultants and support the technical needs required to develop and implement a plan	Technical Resources Roadmap for Southeastern States
Non-Utility Programs	How non-utility programs might be used as a tool to support state compliance	Non-Utility Energy Efficiency Programs: What Are They? How Can a State Compliance Plan Leverage Them?



PROJECT TIMELINE

Beginning in April 2015, SEEA will release a series of resource papers that focus specifically on key barriers identified in southeastern stakeholders' comments on the Clean Power Plan submitted to EPA. Outreach for this project is currently underway, and papers will be released regularly throughout the spring.

PROJECT CONTACTS

For more information on this project, or to provide feedback on specific topics of interest, please contact Katie Southworth, katie.southworth@emvenergy.net, (615) 979-5534 or Abby Schwimmer, aschwimmer@seealliance.org, or (404) 602-9665.