State and Municipal Comptroller and Treasurer Comment Letter

December 14, 2017

Scott Pruitt, Administrator
Environmental Protection Agency
Office of the Administrator 1101A
1200 Pennsylvania Avenue N.W.
Washington, DC 20460

Re: Docket ID No. EPA–HQ–OAR–2017–0355

Dear Mr. Pruitt:

The undersigned state and municipal treasurers and comptrollers submit this letter as an official comment in response to the Environmental Protection Agency's (EPA's) notice of proposed rule-making (NPRM) addressing repeal of the Clean Power Plan, published in the Federal Register on October 16, 2017.

As public officials involved in the oversight and management of state and municipal finances and public pension funds, we support public policies to mitigate anthropogenic climate change, such as the Clean Power Plan.

We have arrived at this position through analysis of peer reviewed scientific and economic literature, which in our view conclusively demonstrates that unmitigated anthropogenic climate change will produce significant losses in both domestic and global consumption as well as threaten the lives and well-being of the people we represent.

The potential economic costs of increasing temperatures due to anthropogenic climate change are significant. A recent analysis of the impacts of climate change on the U.S. economy suggests that each 1°C increase in temperature will cost 1.2% of the country's gross domestic product per year on average.[1] Climate change also poses significant risk to investors with potential portfolio losses of $4.2 trillion globally, or 3 percent of the current market capitalization of all the world's stock markets, through 2100 (The Economist, Intelligence Unit, 2015). These effects could substantially impact the nation's business operations, revenue, and expenditures and negatively affect the economic well-being of all Americans.

Our review of the NPRM and supporting materials leads us to believe that the EPA's proposed action to repeal the Clean Power Plan will result in a significant increase in carbon dioxide emissions from the electric power sector of approximately 348.5 million metric tons, or 22 percent, as compared with reductions projected to be achieved by the Clean Power Plan.[2]

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[1] http://science.sciencemag.org/content/sci/356/6345/1362.full.pdf
[2] *Annual Energy Outlook 2017: Table: Energy-Related Carbon Dioxide Emissions by Sector and Source.* U.S. Energy Information Administration.

The EPA's proposed repeal poses an unacceptable significant risk to the financial health of states and municipalities and the investments we manage. In addition, the proposal would increase the risk of loss of life and property in the communities we represent.
We strongly urge the EPA to reconsider this ill advised NPRM and rather than acting to increase emissions of greenhouse gas pollutants, seek ways to achieve additional reductions in these emissions.

Sincerely,



Thomas P. DiNapoli
New York State Comptroller



John Chiang
California State Treasurer



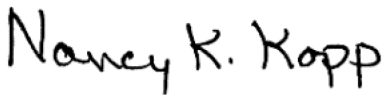
Tim Eichenberg
New Mexico State Treasurer



Michael Fitzgerald
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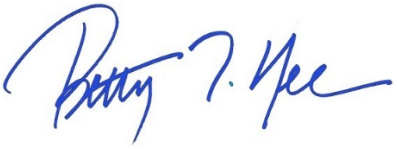
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