



November 30, 2020

RE: Climate Pollution Reduction Program
Discussion Draft
October 9, 2020

To: Brendan Larkin
Senior Policy Advisor
Congressman Paul Tonko (D-NY)

The Gas Turbine Association (GTA) is a trade organization representing the major combustion turbine manufacturers in the United States. GTA members produce combustion turbines ranging from 1 to over 400 MW in size. Member companies produce combustion turbines for the power industry, oil and gas operations, commercial operations such as hospitals and campuses, and industrial operations.

- Combustion turbines produce over one-third of our nation's electricity.
- Combustion turbines are a cornerstone energy conversion technology, providing electricity and heat for industries and communities.
- Combustion turbines will play an increasingly important role in the achievement of national objectives related to energy and the environment.
- Technical advances make combustion turbines the logical choice for new power generation and for replacing the aging fleet of thermal facilities operating on oil or coal due to their beneficial attributes, including but not limited to highly efficient energy conversion, flexibility, use of low-carbon, plentiful, inexpensive natural gas to reduce criteria air pollutants and greenhouse gas (GHG) emissions, lower capital costs, easier permitting, quicker to construct, smaller footprint, and portable in smaller sizes for emergency power and temporary needs.

The GTA appreciates the opportunity to provide preliminary comments to the draft legislation. While our comments are combustion turbine centric, for purposes of CO₂, they apply to other combustion sources as well.

The GTA would like to initially make the following two comments that are in-line with our comments to prior climate related efforts at EPA – namely the Tailoring Rule, Clean Power Plan, Affordable Clean Energy Rule, and the GHG NSPS – Subpart TTTT. We are willing and ready to speak with the team that is drafting the legislation and would be happy to provide input and technical consultation.



For further questions or for supporting information, please contact me at wITHERSPOON_LESLIE_H@SOLARTURBINES.COM.

The 25,000 tpy threshold is too low –

When the Tailoring Rule was being developed, EPA determined that the 25,000 tpy threshold level, would be an excessive burden and moved up to the 100,000 tpy level which would result in a more acceptable regulatory burden. While GTA believe the 100,000 level is still too low for a manageable cap & trade program, it should be the minimum considered for the Climate Pollution Reduction Program. GTA would recommend a level in the 225,000 - 500,000 tpy CO₂e range for applicability based on equivalency to criteria pollutant thresholds in other regulatory programs.

Implementation Timeline –

While we share the Congressman's desire to reduce carbon emissions as quickly as possible, we do have concerns with the program start date in the current draft bill. Undoubtedly, this bill will require new investments and new technologies to be installed across the economy to meet the required emissions reductions.

Specifically, gas turbines are used in many industrial applications and in large power generation plants. Many GTA members have solutions that could be installed in many of these applications, but it will take time, and having the bill go into effect a year from enactment, and the aggressive timeline for allowance reductions, is not enough time to make the many upgrades to meet the requirements laid out in the bill text.

With that mind we request that the bill is changed to allow for a longer transition period between the bill becoming law, and the first year the emission targets would need to be met.

On a separate note, the GTA appreciates the ongoing efforts made by Congressman Tonko in his support of legislation, H.R. bill 2659 that strongly supports increased DOE funding for Advanced Gas Turbine Research. The Congressman's continued leadership in this area is essential for developing the necessary investment in Gas Turbine R&D that leads to long-term clean energy solutions.

Respectfully,

A handwritten signature in black ink that reads "Leslie Witherspoon". The signature is written in a cursive, flowing style.

Leslie Witherspoon
Chair – Environmental Affairs Committee
Gas Turbine Association



Gas Turbine Association Membership

GE Gas Power

Meggitt Sensing Systems

Mitsubishi Power

Power Systems Mfg., LLC (PSM)

Pratt & Whitney

PW Power Systems

Siemens Energy

Solar Turbines

Strategic Power Systems, Inc.

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