

VIA ELECTRONIC SUBMISSION

January 16, 2018

Scott Pruitt
Administrator
U.S. Environmental Protection Agency
1200 Pennsylvania Avenue, N.W.
Washington, DC 20460

Re: Docket ID EPA–HQ–OAR–2017–0355, Repeal of Carbon Pollution Emission Guidelines for Existing Stationary Sources: Electric Utility Generating Units

Dear Administrator Pruitt:

Associated Builders and Contractors Inc. (ABC) hereby submits the following comments to the U.S. Environmental Protection Agency (EPA) in response to the above-referenced proposed rule, published in the *Federal Register* on Oct. 16, 2017, at 82 Fed. Reg. 48035.

About Associated Builders and Contractors Inc.

ABC is a national construction industry trade association established in 1950 that represents more than 21,000 members. ABC and its 70 chapters help members develop people, win work and deliver that work safely, ethically and profitably for the betterment of the communities in which ABC and its members work. ABC's membership represents all specialties within the U.S. construction industry and is comprised primarily of firms that perform work in the industrial and commercial sectors. Moreover, a majority of our contractor members are classified as small businesses. Our diverse membership is bound by a shared commitment to the merit shop philosophy in the construction industry. The philosophy is based on the principles of nondiscrimination due to labor affiliation and the awarding of construction contracts through open, competitive bidding based on safety, quality and value.

Background

On Oct. 23, 2015, EPA entitled Carbon Pollution Emission Guidelines for Existing

On Feb. 9, 2016, the U.S. Supreme Court voted 5-4 to grant a request by 27 states and a number of companies and businesses to block the CPP from being implemented while litigation continued over the rule's legality.³ On March 28, 2017, President Donald Trump signed Executive Order (EO) 13783, Promoting Energy Independence and Economic Growth, which called for a review of the CPP.⁴ In accordance with the president's EO, on Oct. 16, 2017, the EPA issued a proposed rule to repeal the CPP.⁵

Conclusion

For the reasons outlined above, ABC supports the EPA’s proposal to repeal the Obama-era CPP. ABC looks forward to working with the EPA on any new proposal to replace the CPP and to support important initiatives and policies that ensure affordable energy, energy independence and critical jobs for hardworking Americans.

Thank you for the opportunity to submit comments on this matter.

Respectfully submitted,

A handwritten signature in black ink, appearing to read "Ben Brubeck", is written over a solid black rectangular redaction box.

Ben Brubeck
Vice President of Regulatory, Labor and State Affairs