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July 17, 2023

The Honorable Michael Regan
Administrator
U.S. Environmental Protection Agency
1200 Pennsylvania Avenue NW
Washington, DC 20004

Re: New Source Performance Standards for GHG Emissions from New and Reconstructed EGUs; Emission Guidelines for GHG Emissions from Existing EGUs; and Repeal of the Affordable Clean Energy Rule, Docket No. EPA-HQ-OAR-2023-0072

Dear Administrator Regan:

The Industrial Energy Consumers of America (IECA) respectfully requests a comment period extension of at least 60 days for the proposed rules entitled New Source Performance Standards for GHG Emissions from New and Reconstructed EGUs; Emission Guidelines for GHG Emissions from Existing EGUs; and Repeal of the Affordable Clean Energy Rule.

One hundred percent of the costs of compliance will be passed onto consumers and, if not done correctly, competitiveness could be impacted. It is essential that there is careful consideration of additional input needed by consumers, generators, and technology experts. More time is needed to provide that input.

The manufacturing sector is a significant stakeholder. We consume 25 percent of U.S. electricity and generate \$2.7 trillion in GDP. The consequences of the proposed rules on electricity reliability and costs have U.S. manufacturing companies very concerned.

Thank you for your consideration.

Sincerely,

Paul N. Cicio
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President & CEO

The Industrial Energy Consumers of America is a nonpartisan association of leading manufacturing companies with \$1.1 trillion in annual sales, over 12,000 facilities nationwide, and with more than 1.8

million employees worldwide. It is an organization created to promote the interests of manufacturing companies through advocacy and collaboration for which the availability, use and cost of energy, power or feedstock play a significant role in their ability to compete in domestic and world markets. IECA membership represents a diverse set of industries including: chemicals, plastics, steel, iron ore, aluminum, paper, food processing, fertilizer, insulation, glass, industrial gases, pharmaceutical, building products, automotive, brewing, independent oil refining, and cement.