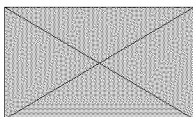


To: Dravis, Samantha[dravis.samantha@epa.gov]
From: Jack Gerard, API
Sent: Wed 11/29/2017 2:28:50 PM
Subject: Natural Gas Brings Reliability, Affordability to Electric Grid

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November 29, 2017

Dear Samantha,

U.S. electricity increasingly is produced by natural gas, and consumers are benefitting. Natural gas-fired generation has not only lowered costs for consumers and played a lead role in cutting U.S. carbon emissions, it's enhanced the reliability and resilience of America's electric power system. The unique attributes and flexibility of generation resources powered by natural gas can provide baseload power, and power plants that run on natural gas can also quickly adjust to efficiently interact with other power sources to meet changing power needs throughout the day.

Competitive markets for power are working, providing affordable, reliable and safe electricity to homes and businesses. But a proposal under review by the Federal Energy Regulatory Commission (FERC) could fundamentally alter those outcomes, potentially altering the electricity market based on criteria that will not necessarily contribute to grid resilience.

A large and varied coalition of organizations is speaking out about the downside of government intervention in electricity markets. Take a look at the concerns:

U.S. Manufacturers (represented by the Electricity Consumers Resource Council, American Chemistry Council, American Forest & Paper Association, American Iron and Steel Institute, and a number of state industrial energy groups): "If implemented, the Proposal would override the market's ability to select the most efficient units, increase the electricity costs by many millions of dollars for untold numbers of businesses and consumers, and result in substantial loss of U.S. manufacturing capacity of jobs... The Proposal would subsidize coal and nuclear generation and their jobs, putting at risk a far larger number of U.S. manufacturing jobs that face considerable pressure from foreign competition."

American Council on Renewable Energy: "We're hopeful that FERC will rule against an anti-competitive distortion of the electricity marketplace and avoid new unnecessary initiatives that increase power prices for American consumers and businesses."

Former FERC member, Nora Mead Brownell: "Let's think about those people who pay the bills at the end of the day, because these are things that affect their lives. ... When we're asking for customers to pay for something, we better make sure they're getting value. ... To lose that to invest in a mature industry, in mature technologies that are not adding the value we need in terms of efficiency, resilience... and reliability is really just a tax on customers." Additionally, eight former FERC Commissioners submitted comments strongly opposing the proposed rule and the negative consequences resulting from its adoption.

While multiple forms of power generation have a role in America's energy mix, the competitive market, not government intervention, is the best way to ensure the optimal outcome for consumers. Markets are driving the development of a reliable, resilient and diverse electric grid, and natural gas has earned its place as the fuel of choice. The resilience of North

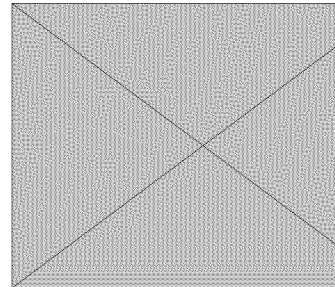
America's power system is an important priority. More than two decades of experience demonstrate that allowing markets to determine the fuel mix of the U.S. generation portfolio is the best way to ensure efficient, responsive, affordable and cleaner energy.

Sincerely,

Jack N. Gerard
President & CEO
API

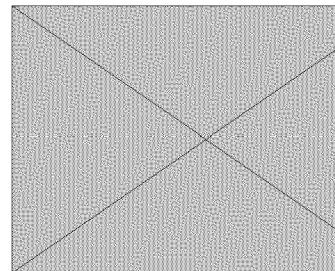
Keystone XL Clears Final Regulatory Hurdle

The Nebraska Public Service Commission's approval of the Keystone XL pipeline is a significant milestone for a project that would enhance crude oil delivery from Canada to U.S. refineries on the Gulf Coast while also increasing U.S. energy security. [Learn more about the economic and energy security benefits](#) of building Keystone XL and other energy infrastructure.



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To stay up-to-date on the latest energy-related news, there is no better place to check than the [Energy Tomorrow Blog](#).



About API:

API is the only national trade association representing all facets of the oil and natural gas industry, which supports 10.3 million U.S. jobs and nearly 8 percent of the U.S. economy. API's more than 625 members include large integrated companies, as well as exploration and production, refining, marketing, pipeline, and marine businesses, and service and supply firms. They provide most of the nation's energy and are backed by a growing grassroots movement of more than 40 million Americans.

To learn more about API and the value of oil and natural gas, please visit [API.org](#).

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