



February 14, 2012

The Honorable Jeffrey Zients
Acting Director
Office of Management and Budget
725 17th Street, N.W.
Washington, DC 20503

Dear Acting Director Zients,

We represent a diverse set of business interests who support the implementation of strong federal clean air standards. Our business partner members range in size from Fortune 500 companies to small businesses and constitute more than 125,000 businesses and more than 300,000 individual business leaders, entrepreneurs, and investors with collective assets totaling more than \$9.5 trillion. As organizations representing both energy industries and the broader U.S. economy, we are united in our position that the Environmental Protection Agency (EPA) be allowed to maintain its authority to fulfill its legal obligation to develop and implement greenhouse gas (GHG) standards under the Clean Air Act.

We urge the Office of Management and Budget (OMB) to finalize its review of EPA's proposal to establish GHG emission limits for new and modified power plants under the New Source Performance Standards program and oppose attempts to block those important new power plant standards. We understand the importance of certainty and clear market signals and believe a national standard will both clarify risks and opportunities for US businesses, while also leading to technological innovation and investment in the domestic clean energy market. Derailing or delaying such standards leads to increased uncertainty and undermines the potential for capital investment and economic growth, weakening the opportunity presented to US businesses by the growing \$243 billion global clean energy market.

Investing in cleaner technologies and more efficient resources can be a pathway to profit and prosperity, boosting global and domestic economic growth and creating jobs while also providing competitive returns to investors. In fact, the US electricity industry is one of the most capital-intensive industries in the country, routinely investing between \$80 and \$110 billion per year on capital infrastructure projects. The Bureau of Labor Statistics shows that for every \$1 million of investment in a construction project 11 new jobs are created. For an infrastructure project requiring \$200 million worth of investment, this equates to 2,200 jobs. When multiplied by dozens of projects around the country, an investment in clean energy infrastructure becomes a meaningful step towards economic recovery and growth.

The uncertainty imposed by attempts to curtail GHG standards are stalling investments and jeopardizing much-needed American jobs that would be created both directly and indirectly from investments in low carbon technologies, such as carbon capture and sequestration, and new energy infrastructure as the electric sector transitions towards a cleaner generating fleet. It is our hope that you will move forward

with finalizing these rules. Doing so will create jobs, spur innovation, and unleash investment in new technologies.

On behalf of the business interests below, we urge you to uphold the authority of the EPA to promulgate GHG standards under the Clean Air Act.

Sincerely,

American Sustainable Business Council
Ceres
Environmental Entrepreneurs
Main Street Alliance
Small Business Majority

The American Sustainable Business Council (ASBC) is a growing coalition of business networks and businesses committed to advancing a new vision, framework and policies that support a vibrant, equitable and sustainable economy. The Council brings together the business perspective, experience and political will and strength to stimulate our economy, benefit our communities, and preserve our environment. Today, the organizations that have joined in this partnership represent over 100,000 businesses and more than 200,000 entrepreneurs, owners, executives, investors and business professionals. www.asbcouncil.org

Ceres is a national coalition of major investors, businesses and public interest organizations working with companies to address sustainability challenges such as climate change and water scarcity. www.ceres.org

Environmental Entrepreneurs (E2) is the independent business voice for the environment. E2 is a national community of individual business leaders who advocate for good environmental policy while building economic prosperity. E2 takes a reasoned, economically sound approach to environmental issues by relying on fact-based policy expertise. As the independent business voice in the debate, E2 is effective and delivers results at both the state and national levels through its bipartisan efforts. www.e2.org

The Main Street Alliance is a national network of state-based small business coalitions. The Alliance creates opportunities for small business owners to speak for ourselves, advancing public policies that are good for our businesses, our employees, and the communities we serve. www.mainstreetalliance.org

Small Business Majority is a national nonpartisan small business advocacy organization founded and run by small business owners and focused on solving the biggest problems facing small businesses today. We speak for the nearly 28 million Americans who are self-employed or own businesses of up to 100 employees. Our organization sponsors scientific research that guides us to understand and advocate on behalf of the interests of small businesses across the country. www.smallbusinessmajority.org