



FACT SHEET
Proposed Affordable Clean Energy Rule –
Comparison of ACE and CPP

| | CPP | ACE Rule |
|-------------------------------------|---|--|
| CO₂ emissions | The ACE Rule continues downward CO ₂ trend, pushing power sector CO ₂ emissions to around 34% below 2005 levels (similar to CPP). | |
| EPA’s policy role | Expansive program to regulate entire energy sector | Reasonable program focused on potential upgrades to coal plants |
| | Inserted EPA into energy policy | Keeps EPA focused on environmental policy |
| | Reshaped the grid and energy markets | Leaves the market alone and doesn’t pick winners and losers |
| Coal impacts | Shut down coal | Keeps coal plants open and makes them more efficient |
| Reliability and energy mix | Promoted disinvestment in coal in favor of renewables and natural gas | Promotes investments to make coal plants cleaner, modern and more efficient |
| | Relied on fuel switching | No fuel switching |
| Federal and state roles | Set a single federal standard and forced states to adopt it | Lets states set their own standards that meet federal guideline consistent with current law |
| State plans and deadlines | Included detailed requirements for state plans | Includes flexible guidelines for states to evaluate potential for energy efficiency |
| | Required states to report to EPA up to 6 times over 15 years, starting 1 year after final rule | States may only need to make 1 submission to EPA, and 3 years after final rule |
| New Source Review permitting | No changes to NSR permitting requirements, deterring energy efficiency upgrades at coal plants | Targeted updates to NSR so coal plants can improve efficiency and modernize |
| | Retained annual test in NSR, meaning efficiency upgrades would likely trigger more requirements | Proposes initial hourly trigger for NSR, meaning efficiency projects won’t trigger additional requirements |

FOR MORE INFORMATION

<https://www.epa.gov/stationary-sources-air-pollution/proposal-affordable-clean-energy-ace-rule>