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The Editor
The Wall Street Journal
1211 Avenue of the Americas
New York, NY 10036 212-416-2000

Dear Editor:

As a Journal subscriber, I was surprised to see how many factual errors were in the WSJ's April 5, 2012 editorial ("Killing Coal"). Here are just a few of the more important ones, with some important corrections:

- EPA has imposed a de facto ban on new coal plants since 2009: Actually, 1,793 MW of new coal-fired generating capacity came on line in 2009, followed by another 5,246 MW in 2010 and another 2,343 MW in 2011 (NETL and EIA data).
- The EPA assumes that the U.S. will never complete another coal-fired project, ever: Actually, the regulatory impact statement accompanying the rule explains that the proposed regulation specifically exempts the 15 plants that EPA has identified are likely to begin construction within a year of the proposed regulation.
- The EPA's new source performance standard for CO2 applies to modifications made at existing coal-fired plants to meet upcoming pollution rules ("…as a utility obeys the mercury rule, say, it will also be caught in the pincer movement"): Actually, the EPA's proposed regulation states that power plant owners' installation of pollution control equipment projects are "specifically exempt" from the definition of a NSPS modification.
- To control CO2, utilities will need to install new technology such as capture-and-sequestration systems: While generally true, the EPA would give new coal plants 10 years to add such systems, specifically so that new coal would not be squeezed out of the mix.
- The environmental lobby is applauding the new regulations: Actually, many environmental groups have criticized EPA for allowing so much flexibility for new coal plants.

Most astonishingly, although pointing out a preference that it is "far better to let markets decide which energy sources to develop," the WSJ editors fail to note the loud statements from the marketplace (and reported in the Journal's own pages) that new coal plants (and new nuclear plants) are just too expensive to build in an era when natural gas is so plentiful and cheap: see, for example, "Cheap Natural Gas Unplugs U.S. Nuclear-Power Revival," Rebecca Smith (March 2012); "Oil and Gas Boom Lifts U.S. Economy," Russell Gold (February 2012); "Glut Hits Natural-Gas Prices," January 2012; "Stepping on the Gas," Daniel Yergin (April 2011); "Shale Gas Will Rock the World," Amy Meyers Jaffe (May 2010).

- Susan Tierney
- Managing Principal, Analysis Group
  (former Assistant Secretary for Policy, U.S. Department of Energy)
  (member, Bipartisan Policy Commission Energy Project)