

**Aric Newhouse**

*Senior Vice President  
Policy and Government Relations*

September 21, 2011

U.S. House of Representatives  
Washington, DC 20515

Dear Representatives:

The National Association of Manufacturers (NAM), the largest manufacturing association in the United States representing manufacturers in every industrial sector and in all 50 states, urges you to support H.R. 2401, the Transparency in Regulatory Analysis of Impacts on the Nation (TRAIN) Act.

Utilities and manufacturers have spent years improving the environment by investing billions of dollars in new pollution control technologies and building new plants to comply with the Clean Air Act. As a result, there have been significant improvements in our nation's air quality.

Nevertheless, U.S. manufacturers and utilities, struggling to survive and create jobs in a fragile economy, are confronting an avalanche of regulatory measures emanating from the Environmental Protection Agency (EPA), including: Utility MACT (Maximum Achievable Control Technology); Boiler MACT; the Cross-State Air Pollution Rule (CSAPR); coal ash; first-time federal rules on greenhouse gas emissions; and more.

The EPA is now in the final stages of completing Utility MACT rules which, in many cases, are unachievable and unaffordable. These regulations would have a significant impact on the cost of electricity to both consumers and manufacturers, which use roughly 30 percent of our nation's electricity.

Under Utility MACT and the recently finalized CSAPR, electricity costs will increase by as much as 23 percent in some of the largest manufacturing regions of our nation, resulting in a loss of 1.4 million jobs by 2020, according to National Economic Research Associates. In addition to cost increases and job losses, there will be serious grid reliability issues as coal-fired power plants are taken offline. These reliability issues will likely manifest themselves in a lack of adequate power for both industrial users and consumers.

Before imposing unduly strict mandates on America's job creators, Congress and the regulatory agencies should employ rigorous economic analysis to better understand potential economic impacts and cost-benefit relationships. The TRAIN Act calls for a cumulative analysis of pending EPA proposals – while staying the Utility MACT proposal and CSAPR until six months after the study has been completed. This represents a responsible and prudent course of action, and we urge your support.

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The NAM's Key Vote Advisory Committee has indicated that votes on H.R. 2401, including procedural motions, may be considered for designation as Key Manufacturing Votes in the 112<sup>th</sup> Congress. Thank you for your consideration.

Sincerely,

A handwritten signature in black ink that reads "Aric Newhouse". The signature is written in a cursive style with a long horizontal stroke at the end.

Aric Newhouse