

August 7, 2025

The Honorable Lee Zeldin
Administrator
U.S. Environmental Protection Agency
1200 Pennsylvania Avenue NW
Washington, D.C. 20460

**Re: Comments Submitted by Indiana Electric Cooperatives in Response to
Regulatory Docket ID No. EPA-HQ-OAR-2025-0124**

Dear Administrator Zeldin:

Indiana Electric Cooperatives (IEC) appreciates the opportunity to comment on the U.S. Environmental Protection Agency's (EPA) proposed repeal of the Greenhouse Gas Emissions Standards for Fossil Fuel-Fired Electric Generating Units (power plant rule). IEC represents Indiana's electric cooperatives that serve 1.3 million Hoosiers in 89 of the state's 92 counties. The cooperatives are collectively the second-largest electricity provider in the State of Indiana.

As not-for-profit cooperatives, our highest priority is ensuring member-consumers receive safe, reliable, and affordable power 24/7/365 across our primarily rural communities. The reliable delivery of economical electricity is vital for our rural communities to grow and thrive. Most of Indiana's distribution cooperatives receive their power through one of two Indiana cooperative generation and transmission companies, which collectively maintain a mix of coal, gas, and renewables to supply that power. We believe the ongoing energy transition should continue to be driven by common-sense actions and policies at the closest level possible to the cooperative (i.e., the boards of directors, who are elected by their peer member-consumers), not by overreaching and unrealistic national regulations that fail to adequately consider legal precedent, demonstration of technology readiness, and the reliability and affordability of the electric system.

In May 2024, the EPA under the previous administration finalized rules aimed at existing coal and new natural gas power plants. However, we believe the 2024 power plant rule is unlawful, unachievable, and will only exert unnecessary pressure on the reliability and affordability of an electric system already under significant stress, which is primarily driven by economic and technological changes and changing preferences for our member-consumers.

1. The Rule is Inconsistent with the Law and Supreme Court Decisions

We believe the rule violates the Clean Air Act and the Supreme Court’s “major questions” doctrine. It would create vast economic and political consequences, thus requiring a clear direction from Congress. EPA cannot and should not expand the interpretation of the Clean Air Act without additional legislative authority granted by Congress.

2. The Rule is Unrealistic and Relies on Inadequately Proven Technologies

Carbon capture and storage (CCS) and hydrogen co-firing may be promising technologies, but they are not widespread or readily available. In Indiana, CCS and hydrogen technologies are ongoing political and policy topics, with significant debate on the use and deployment of the technologies in communities across the state. As with the rest of the United States, there is virtually no supporting infrastructure in Indiana, and scaling to a massive infrastructure network that could reasonably implement CCS and hydrogen at the scale required by the rule would be nearly impossible in the timelines imposed.

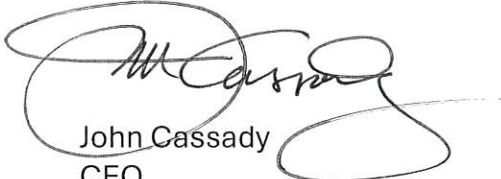
3. The Rule Jeopardizes the Reliability and Affordability of the Electric Grid

The rule’s goal appears to target and eliminate many of the electric grid’s vital generation resources, which have significant dispatchable, baseload, and capacity characteristics desperately needed today and highly valuable to the system. EPA should not introduce rules that create significant reliability challenges on an already stressed system, coupled with compliance regimens that will only induce skyrocketing electric rates. Grid operators continue to perform their job with fewer resources they can count on when needed most, and the EPA’s rule would only elevate the risk of potential blackouts and higher costs, creating devastating economic consequences for the communities our members serve.

The intervention via federal environmental regulations continues to significantly erode the ability of grid operators and cooperatives to manage the energy transition so that Hoosiers receive the expected and necessary level of safe, reliable, and affordable service for the continued economic vitality of our communities. For these reasons, we support the EPA’s repeal of the power plant rule. We also encourage future rulemakings that promote the robust development of adequate and diverse generation portfolios based on market changes, technological

innovation, and consumer member-driven preferences to ensure the safe, reliable,
and affordable delivery of electricity for our communities.

Sincerely,

A handwritten signature in black ink, appearing to read "John Cassady", is written over a large, stylized circular flourish.

John Cassady
CEO
Indiana Electric Cooperatives