



DAVID A. RAYMOND
PRESIDENT & CEO

September 21, 2011

Dear Member of Congress:

On behalf of the American Council of Engineering Companies (ACEC) – the business voice of the nation’s engineering industry – we urge you to support HR 2401, the Transparency in Regulatory Analysis of Impact on the Nation Act of 2011 (“TRAIN Act”). The bill requires the President to establish a cabinet-level interagency committee to analyze the cumulative impact of certain EPA rules and actions on utility, energy and manufacturing facilities and report those impacts to the public.

The EPA rules and actions covered by the analysis include:

- Greenhouse Gas (GHG) New Source Performance Standards for Petroleum Refineries and Utilities
- Prevention of Significant Deterioration and Title V permitting for GHG Emissions
- Ambient Air Quality Standards for Ozone, Particulate Matter, Sulfur Dioxide and Nitrogen Dioxide
- Clean Air Transport Rule
- Boiler Maximum Available Control Technology (BACT) for Major and Area Sources
- Electric Generating Units Maximum Achievable Control Technology (MACT)
- Coal Combustion Residuals Rule
- Recent EPA actions under the Regional Haze Program

The bill requires the analyses to include the impacts on U.S. competitiveness, including energy intensive and trade sensitive industries; other cumulative cost and cumulative benefit impacts; changes in electricity and fuel prices; impact on national, state and regional employment, both long-term and short-term, and reliability and adequacy of the bulk power supply.

While current law requires each regulation to be analyzed with regard to its fiscal impact on the economy, HR 2401 will result in a better picture of the cumulative impacts of multiple regulations affecting similar industries. As a result, we believe that EPA will have to coordinate its separate analyses and provide more comprehensive information to industries and policymakers. We urge your affirmative vote for HR 2401.

Sincerely,

A handwritten signature in black ink, appearing to read "David A. Raymond", is written over a faint, larger version of the signature.