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EDWIN D. HILL
International President

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International Secretary-Treasurer

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Dear Representative:

On behalf of the approximately 725,000 members of the International Brotherhood of Electrical Workers (IBEW), I write concerning the American Clean Energy and Security (ACES) Act of 2009 (H.R. 2454), legislation designed to address the threat of global warming. While I support efforts to address global climate change, the IBEW supported the Bingaman-Specter Low Carbon Economy Act in 2007; I remain very concerned with certain provisions of the proposed legislation.

I recognize the hard-work of Chairman Waxman and members of the House Energy and Commerce Committee in crafting H.R. 2454. I am grateful for the inclusion of Davis-Bacon prevailing wage protections, promotion of additional electric transmission capacity, and incentives for the development of carbon capture and sequestration (CCS) technology. However, I remain very concerned that the initial target of 17% reduction of CO2 emissions from 2005 levels by 2020 is unrealistic. Such a large reduction in a short period of time is only possible with CCS, technology that does not yet exist on a large-scale commercial basis.

Another concern for the IBEW is the lack of strong language to protect U.S. international competitiveness. I co-authored an op-ed in support of a border adjustment provision. It says to our trading partners: if you wish to sell products in the United States, you must address global warming in your country or purchase CO2 allowances, the same as any domestic manufacturer. I recognize ACES contains a border adjustment mechanism, but it is not sufficiently robust. As proposed, the current border adjustment provision does not become effective until 2025, leaving domestic manufacturers exposed for much too long. Additionally, the IBEW supports an independent commission to oversee the border adjustment provision, in contrast to the proposed legislation, which vests authority with the President.

The IBEW recognizes the science of global warming, but we insist on realistic legislation to address the problem that preserves both jobs and the environment. As the House of Representatives begins floor action regarding H.R. 2454, I respectfully request easing the short-term CO2 targets and timetables as well as strengthening provisions regarding international trade.

Sincerely yours,

Edwin D. Hill
International President

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