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Re: Support Congressman John Culberson, Duncan Hunter and Tim Murphy's Social Cost of Carbon Amendments to the Energy Consumer Relief Act of 2013 (H.R. 1582)

Dear Member of Congress:

The American Fuel & Petrochemical Manufacturers (AFPM) supports the amendments introduced by Congressman John Culberson, Duncan Hunter (Amendment #2) and Tim Murphy (Amendment #12) to the Energy Consumers Relief Act of 2013 (H.R. 1582) prohibiting the Environmental Protection Agency (EPA) from using the "social cost of carbon" valuation in its rulemakings. These important amendments will stop the Administration from using arbitrary and subjective benefit calculations to justify costly regulations that will only harm consumers and increase worldwide greenhouse gas emissions, by increasing domestic costs of energy and shifting jobs and industry to countries that are less efficient than those in the U.S. AFPM urges you to support these common sense amendments.

The social cost of carbon (SCC) is an extremely subjective metric that was developed to try and quantify the alleged societal benefits of reducing only domestic greenhouse gas (GHG) emissions. It could theoretically be used in any rulemaking. The SCC is calculated without using any concrete formulas that can make accurate predictions about the future impact of U.S. based carbon emissions. It was recently revised without any adequate and meaningful public and stakeholder involvement and opportunity for notice and comment. Including such a subjective requirement to the rulemaking process only adds additional burdens on to the consumer, as it inflates the potential benefits of regulatory actions in a manner that hides the true economic and societal costs of new rules. Applying such a calculation to assess the costs and benefits of regulations could be erroneously used to justify halting the use of traditional, affordable energy sources through overly stringent regulations in future rulemakings.

The amendments introduce by Congressman Culberson, Hunter and Murphy will protect consumers from government attempts to impose backdoor, costly regulations that could raise energy prices for all Americans with no benefit. AFPM urges you to support these important Amendments.

Sincerely,

Charles T. Drevna