CHAMBER OF COMMERCE
OF THE
UNITED STATES OF AMERICA

R. BRUCE JOSTEN
EXECUTIVE VICE PRESIDENT
GOVERNMENT AFFAIRS

1615 H STREET, N.W.
WASHINGTON, D.C. 20062-2000
202/463-5310

June 15, 2007

The Honorable John D. Dingell
Chairman
Committee on Energy and Commerce
United States House of Representatives
Washington, DC 20515

The Honorable Rick Boucher
Chairman
Subcommittee on Energy and Air Quality
United States House of Representatives
Washington, DC 20515

Dear Chairmen Dingell and Boucher:

The U.S. Chamber of Commerce, the world's largest business federation representing more than three million businesses and organizations of every size, sector, and region, is pleased to provide you with its response to the "renewable portfolio standard" questions you raised in your May 24, 2007, letter. I am the Chamber's Executive Vice President for Government Affairs. Because I am responsible for legislative matters, the Chamber's President and Chief Executive Officer, Thomas J. Donohue, asked that I respond on the Chamber's behalf. Your questions are summarized below; they are addressed in the order set forth in your letter.

I. Purpose of Portfolio Standards Proposals: Should the federal government impose a mandatory renewable portfolio standard (RPS) on retail electricity sources, as well as generation-source requirements on load-serving utilities; would an RPS be necessary if Congress were to adopt an economy-wide greenhouse gas reduction policy; and what, if any, analysis has been done of an RPS that our organization would endorse.

The Chamber strongly opposes a federally-mandated RPS. A mandatory RPS could raise electricity prices for all consumers and result in a wealth transfer among states. Presently, the Senate is discussing a 15 percent standard for non-hydro renewables, and Senator Domenici recently introduced an alternate plan that includes a broader range of energy sources but boosts the RPS to 20 percent. All current legislation generally requires the standard to be met by 2020.

There are several reasons why a federally-mandated RPS is unnecessary. First, and foremost, renewable generation sufficient to meet the requirement is neither cost-effective nor achievable nationwide. The sheer magnitude of the electricity that would have to be produced using approved renewable energy technologies is just too great, too costly, and would produce a host of problems that have not been adequately thought out. It is simply not possible to put the required amount of renewable energy technology in place in this country by 2020.

Indeed, many states have chosen not to adopt an RPS because they lack the renewable resources to meet such a standard. For the 24 states that have imposed a statewide RPS, a mandatory federal standard would undercut or preempt those existing state renewable power programs. Individual states, given the discretion to carefully consider whether they can meet an RPS, have done so where appropriate; states that determined they cannot meet an RPS have not.

On a different note, the Chamber does not promote the adoption of a mandatory greenhouse gas reduction policy, whether it be cap-and-trade, carbon tax or another similar method. As detailed in the Chamber's March 19, 2007, letter to you regarding climate change, any global climate solution should be international and economy-wide in scope, and should preserve competitiveness and promote conservation and efficiency, and must promote technology research, development and demonstration. With that in mind, however, implementation of an economy-wide greenhouse gas reduction policy would certainly negate the usefulness of a federally-mandated RPS. The greenhouse gas reduction policy would act as an incentive to develop renewable fuels; due to carbon-constrictions, states and localities would have no choice. The Energy Information Administration (EIA) confirmed that the increased use of renewables as mandated by an RPS would lead to correspondingly lower coal and natural gas generation;[1] virtually the same result would occur if a greenhouse gas reduction regulatory scheme were in place. However, such an approach would be unadvisable, as the drawbacks of a mandatory greenhouse gas reduction policy seriously outweigh any potential benefits.

The Chamber does not endorse any specific RPS, and cannot accordingly provide an in-depth analysis of an RPS it would endorse.

II. Portfolio Inclusions and Exclusions: Which energy sources should be included in an RPS; should there be a "tiered" system for eligibility, and should there be a distinction between new and existing sources; should there be credits for useful thermal energy from eligible resources; and should energy efficiency be considered, and, if so, how.

One of the major drawbacks to current and RPS bills that have circulated through Congress is the definition of what energy sources are "renewable." Clean, safe, and reliable energy sources such as hydropower, nuclear power, and clean coal technology have typically been excluded from this definition. As a result, the RPS accomplishes precisely what energy legislation should not do: it picks winners and losers. Should Congress choose to bind all states to a baseline renewable portfolio standard—which, again, the Chamber does not consider necessary—then it must strive to be as inclusive as possible. If the true policy goal of an RPS is

[1] Energy Information Administration, *Impacts of a 15-Percent Renewable Portfolio Standard*; Report # SR/OIAF/2007-03 (June 2007), *available at* http://www.eia.doe.gov/oiaf/servicerpt/prps//pdf/sroiaf(2007)03.pdf.

to encourage energy production, there is no legitimate reason why certain clean, safe energy producers are left standing at the door while others benefit.

Further exacerbating the problem of which sources to include is the fact that almost half the states in this country already have an RPS. Complicated problems such as tiers, eligibility, and cut-offs arise due to the inherent conflict between existing state renewable portfolio schemes and the proposed federal RPS. Credits—whether for thermal energy, energy efficiency, or something else entirely—are a good illustration of this federal-state conflict. A federal RPS must give credit to resources the consumers in each state are already paying for; otherwise those consumers will be paying twice.

Put simply, this discussion about inclusion, eligibility, threshold dates and credits would be unnecessary if those programs were simply left alone and not preempted by federal legislation.

III. Percentage Requirement and Timing: What target percentages and years should be included in the RPS; how to accelerate to the target; and should there be any "off-ramps" or other safeguards for contingencies.

As previously stated, the Chamber opposes a federal RPS, so discussion of a target is not possible. However, the Chamber recently analyzed the attainability of a 10 percent RPS—a standard considerably lower than any currently being considered—and found: (1) it would be literally impossible to meet even that standard using a single energy solution (i.e., wind, photovoltaics, biomass) on its own; and (2) because an energy mix would be required to even attempt to meet the 10 percent baseline, inconsistent renewable source capabilities from state to state will likely result in failure.

A. Neither Wind, Photovoltaic, nor Biomass can Individually Meet a 10 Percent RPS.

In 2005, base sales of electricity from investor-owned utilities (IOUs) were about 3,553,139 gigawatt-hours (GWh),[2] and about 501,549 GWh[3] of total electricity generation was produced using "classically renewable" energy resources, i.e., solar, wind, biomass, and geothermal (and not hydroelectric, nuclear or so-called "clean" energy sources).

[2] Per the Edison Electric Institute (EEI); actual IOU base sales are calculated from total IOU sales to ultimate customers. *See* http:.//www.eei.org/industry_issues/industry_overview_and_statistics/industry_statistics/index.htm.
[3] *Id*.

If IOU base sales of electricity grow at approximately 1.64% per year[4] relative to the year 2005 base production level, then IOU base electricity production in 2020 will be about 5,052,141 GWh. Requiring in 2020, for sake of argument, that 10 percent of this base electricity production must come from additional "classic renewables," then these sources must generate an 505,214 additional GWh of electricity above the 501,549 GWh produced from renewables in 2005.

Compared with conventional power generation, the current most cost competitive "classically renewable" technology is generation of electricity via the use of wind turbines, and the least cost competitive "classically renewable" option is solar power generation of electricity via the use of photovoltaic technology. Comparing the costs and demands of producing electricity from wind (~ 3+¢ to 6¢ per kWh)[5] versus photovoltaic (~ 20¢ per kWh)[6] versus conventional power generation (e.g., using natural gas, which costs ~3¢ to 4¢ per kWh)[7] can help frame an understanding of the impacts of the RPS.[8]

1. Wind

A typical large-scale wind-driven turbine has a capacity of approximately 1.5 megawatts (MW);[9] in 2007, installed electric power capacity from wind was approximately 11,700 MW.[10] In all, this results in electricity production of roughly 1,200 MWh of electricity production per MW of installed capacity. This equals maximum power generation 23 percent of the time over a period of one year, indicating that, overall, generation of electric power from wind is highly intermittent. Hence, there is a strong interest in developing wind power projects offshore, where the potential for generating electricity from wind is more substantial than at most onshore

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[4] Energy Information Administration, *Annual Energy Outlook with Projections to 2020*; Report # DOE/EIA-0383 (2002), Dec. 21, 2002.

[5] Dallas Burtraw, Resources For the Future, Testimony before the Senate Energy and Water Development Appropriations Subcommittee, September 14, 1999; J. McVeigh, et al., Resources For the Future, *Winner, Loser, or Innocent Victim? Has Renewable energy Performed as Expected?*, RFF 99-28, Washington, DC, 1999.

[6] *Id.*

[7] J. David, *Economic Evaluation of Leading Technology Options for Sequestration of Carbon Dioxide*, MS Thesis, Massachusetts Institute of Technology, May 2000.

[8] The costs in ¢ per kWh given above do not include transmission costs; they are "point of generation" costs.

[9] Energy Information Administration, *Cost and Performance Characteristics for Renewable Energy Generating Technologies, Assumptions to the Annual Energy Outlook 2002*, Dec. 21, 2002; P. Ferdinand, "Windmills on the Water Create Storm on Cape Cod", *Washington Post*, August 20, 2002, p. A3; Global Energy Technology Strategy, *Addressing Climate Change - Phase 2 Findings From An International Public-Private Sponsored Research Program*, p. 86 (2007), *available at* http://www.pnl.gov/gtsp/publications.

[10] Estimate provided by the American Wind Energy Association, *available at* http://www.awea.org.

locations. For purposes of the calculations presented below, the projected capacity factor is assumed to be 42 percent[11] rather than 23 percent, reflecting wind technology improvements.

For wind turbines to produce the additional 505,214 GWh necessary to meet a 10 percent standard in 2020 using 1-MW turbines that produce 4,500 MWh of electricity per MW of installed capacity[12], one would need to put in place more than 115,000 1-MW wind turbines.[13]

If the average capital cost for electricity generation is $1194/kW[14] for each 1-MW wind turbine[15], then the total capital cost of constructing about 115,000 of them would amount to **roughly $138 billion**. This figure does not include operation and maintenance costs, which constitute 1.5 to 2 percent of the initial investment annually.[16]

Perhaps even more disturbing than the lofty capital cost of 115,000 wind turbines is the placement: if the space allotted for each 1-MW wind turbine placed in the ocean comprises an area of roughly 0.16 square miles,[17] then 115,000 turbines of this size would occupy an area of about 18,000 square miles. In comparison, the combined area of Albermarle Sound, Delaware Bay, Pamlico Sound, Long Island Sound, Cape Cod Bay, Chesapeake Bay, Puget Sound, San Francisco Bay, Biscayne Bay, and Buzzards Bay is only 8,500 square miles. If the 115,000 1-MW wind turbines were placed in a straight line about 2,000 feet apart in the water, they would have a total length of about 43,000 miles from end to end. This is nearly four times the length of the U.S. shoreline, and almost double the entire circumference of the earth![18]

Moreover, because generation of electricity by wind power is intermittent, to provide power when it is needed (as opposed to when it is produced) one must have intermittent, multi-

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[11] Energy Information Administration, *Cost and Performance Characteristics for Renewable Energy Generating Technologies, Assumptions to the Annual Energy Outlook 2002* (Dec. 21, 2002).
[12] *Id.*
[13] If the wind blew all the time so that the turbines generated electricity at maximum capacity, about half this number of turbines would be required, however, the wind does not blow constantly in this manner.
[14] Energy Information Administration, *Cost and Performance Characteristics for Renewable Energy Generating Technologies, Assumptions to the Annual Energy Outlook 2002* (Dec. 21, 2002).
[15] A recent proposal to build a wind farm consisting of 130 one MW wind turbines off the coast of Massachusetts projected costs at $600 to $700 million. P. Ferdinand, "Windmills on the Water Create Storm on Cape Cod", *Washington Post*, August 20, 2002, p A3.
[16] If the wind blew all the time so that the turbines generated electricity at maximum capacity, total capital costs would be about one half this amount, as fewer turbines would be needed; however, the wind does not blow constantly in this manner, even off-shore.
[17] *See* P. Ferdinand, "Windmills on the Water Create Storm on Cape Cod", *Washington Post*, August 20, 2002, p A3 (The proposed Massachusetts project places 170 turbines in an off shore wind farm having an area of 28 square miles).
[18] Department of Commerce, National Oceanic and Atmospheric Administration, National Ocean Service; *available at* http://www.teachervision.com/lesson-plans/lesson-725.html.

hour energy storage capacity in place. Although there are technologies that can store energy for hours, the sheer size of the storage capacity needed to hold the amount of required intermittent energy generated to meet a 10 percent RPS requirement simply does not exist. Creating such storage capacity remains a critical issue that requires much more attention. Moreover, at the scale needed to meet a 10 percent RPS, the use of batteries to store intermittent energy, which is a current common practice, could create a broad range of hazardous waste disposal problems in the future.

A recent projection[19] indicates installed wind capacity by 2020 will be less than 50,000 GWh, which is much less than the target amount of 505,214 GWh of required renewable electricity sales in 2020. This shortfall, combined with capital cost restrictions and siting limitations, leads to the inevitable conclusion that wind technology will not meet the RPS on its own, and can only fulfill a small fraction of a 10 percent RPS requirement when mixed with other renewables.

2. Photovoltaics

A one-kilowatt photovoltaic (PV) unit produces about 2 to 6 kilowatt-hours of electricity each day.[20] On this basis, a 100 kW PV unit can produce about 73 to 219 MWh of electricity annually, or an average of about 146 MWh per year. For the following calculations, assume a typical PV electricity generating unit that in 2020 has a capacity of 25kW, an average capacity factor of 30%, and in one year generates about .00007 billion kilowatt-hours of electricity.[21]

To produce the additional 505,214 GWh in 2020 to meet a 10 percent RPS using 25 kW PV units, one would need to put in place approximately 7.3 million PV units. If the average cost of each 25 kW unit is $2,200/kW[22], then the total capital cost of this investment would amount to almost **$260 billion**. This figure does not include operation and maintenance costs, which constitute 1 percent of the initial investment annually[23].

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[19] J. McVeigh et al., Resources For the Future, *Winner, Loser, or Innocent Victim? Has Renewable energy Performed as Expected?*, RFF 99-28, Washington, DC, 1999.

[20] BP Solar Corp., "Facts About Solar Power," *available at* http://www.bp.com; IEA Photovoltaic Power Systems Program, *available at* http://www.iea-pvps.org/.

[21] Energy Information Administration, *Cost and Performance Characteristics for Renewable Energy Generating Technologies, Assumptions to the Annual Energy Outlook 2002* (Dec. 21, 2002).

[22] *Id.*

[23] California Energy Commission, "Economics of Owning and Operating DER Technologies", *available at* http://www.energy.ca.gov/distgen/economics/operation.html.

Increasing PV output in order to meet a 10 percent RPS requirement in 2020 is highly unlikely. In the long-term (30 to 40 years), the European Commission projects[24] that PV costs could fall to between 6¢ and 10¢ per kWh, which would make PV competitive price-wise with conventional electric power generation. However, the 7.3 million PV sitings necessary to achieve the 10 percent renewables target by 2020 is relatively impossible to meet. For example, PV units placed on the rooftops of houses have a typical capacity of less than 10 kW. To produce 505,214 GWh in 2020 using 10 kW PV units having a 30% capacity factor, one would need to put in place almost **180 million units**. Even if there are efficiency improvements that cut the required number or cost of PV units in half by 2020, the intermittent nature of the power delivered and potential for damage by storms—hurricanes, tornados, hail, falling trees, etc.—remains, and is a concern in many parts of the country.

In addition, several siting problems occur due to required placement of PV units on the rooftops of houses, given the operation and maintenance demands and capital cost outlay, which all must be borne by the individual household. Even if PV were cost-competitive with conventional electricity generation, it is likely that, in an unfettered market, most consumers would opt to purchase electricity transmitted to their homes on power lines rather than deal with perceived maintenance requirements and capital startup costs, the latter of which can be a significant percentage of disposable household revenue.

Like wind power, because generation of electricity by solar power is intermittent, to provide power when it is needed (as opposed to when it is produced), one must have intermittent, multi-hour storage capacity in place. Although there are technologies that can store charge for hours, the sheer size of the capacity of storage needed to meet a 10 percent RPS simply does not exist. Moreover, at the scale that may be needed to meet the RPS, the use of batteries to store intermittent energy, which is a current common practice, could create a broad range of hazardous waste disposal problems in the future. Circumventing this latter problem may require utilization of high-technology energy storage devices, an industry that is currently small in comparison to the capacity for energy storage that would arise if large amounts of electricity are generated on an intermittent basis, as would be required by a 10 percent RPS.

A recent projection[25] indicates that total PV installed capacity by 2020 will be less than 5,000 GWh, which is much less than the target amount of 505,214 GWh of required renewable energy sales necessary to meet a 10 percent RPS by 2020. This shortcoming, combined with obvious cost and siting limitations, suggests that PV energy could only fulfill a small fraction of a 10 percent RPS.

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[24] P. Zegers, European Commission, "A Long Term RTD Strategy for a Sustainable Energy Supply" *The IPTS Report* May 2002, No. 64, pp. 18–27.
[25] J. McVeigh et al., Resources For the Future, *Winner, Loser, or Innocent Victim? Has Renewable energy Performed as Expected?,* RFF 99-28, Washington, DC, 1999.

3. Biomass

Similarly, energy from biomass is not the answer. It is certainly a compelling option, producing electricity at between 4¢ and 9¢ per kWh.[26] However, like wind and photovoltaic energy, siting and availability present serious roadblocks to meeting a 10 percent RPS requirement by 2020.

In 2005, electric power capacity from biomass was approximately 8,300 MW and electricity generation was approximately 45 million MWh.[27] This corresponds to roughly 5500 MWh of electricity production per MW of installed biomass energy capacity. Generation of the 505,214 GWh of electricity required to meet a 10 percent RPS by 2020 (using 100 MW biomass power plants having a capacity factor of 80 percent[28]) would require placement of 918 biomass energy conversion units, or placement of 1,836 biomass energy conversion units each having a capacity of 50 MW. Given NIMBY (Not In My BackYard) concerns, siting this number of units would be a major issue. Smaller units may not have as favorable an economy of scale, elevating capital costs.

Alternatively, it is possible to co-fire biomass with coal at existing coal-fired power plants. However, these would likely fall outside the RPS due to association with coal. The issue of potential pollutant emissions from such a large number of biomass-augmented power plants is also problematic, as air pollution control equipment designed and optimized for one fuel mix may not be suitable for optimal control of other fuel mix combinations. This issue must be examined on a case-by-case basis and can lead to delays while equipment performance is evaluated.

Even if biomass is available in the quantities necessary to achieve a 10 percent RPS (and this is not altogether assured), it may not be available in the right place at the right time. This complicates fuel supply planning for power generation units, making the process inefficient. In addition, as is currently the case with corn ethanol, competition and demand limitations could significantly raise the biomass fuel price and affect its price competitivity. Another complication can arise in terms of the material integrity of the power plant and power production if the fuel mix composition is constantly shifted owing to the availability or non-availability of the fuels that are to be consumed.

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[26] Footnotes 24 and 25, *Ibid.*

[27] Union of Concerned Scientists, *How Biomass Energy Works*, available at http://www.ucsusa.org/clean_energy/renewable_energy_basics/offmen-how-biomass-energy-works.html.

[28] Energy Information Administration, *Cost and Performance Characteristics for Renewable Energy Generating Technologies, Assumptions to the Annual Energy Outlook 2002* (Dec. 21, 2002).

B. Many States Cannot Support the Energy Mix Required to Satisfy an RPS

Ultimately, neither wind nor photovoltaic nor biomass is a "magic bullet" that will meet even a 10 percent RPS on its own. It is clear, therefore, that any RPS solution must rely on a mix of renewable energy sources. However, putting this theory into practice only serves to highlight many states' inabilities to satisfy such a requirement.

Recent studies have shown that no one renewable energy mechanism has the capacity to fulfill the needs of the RPS. As seen from the calculations above, it is impossible to rely on wind, solar or biomass solely to provide the additional 505,214 GWh of energy required to meet a 10 percent RPS by 2020. One main limitation is the geographical restraint of these sources of energy: determining the share of power generated from wind, solar and biomass sources is highly dependent on the geographical location of the plants. Setting up wind farms in landlocked areas with minimal wind movement will not produce the total amount of energy required from renewables. Placing photovoltaic cells in Northern areas with minimal sunlight will similarly fail. Because both wind and solar technologies require large upfront capital investment, these options are not viable for the country as a whole. Perhaps most importantly, with renewables such as wind and solar power, the conditions and amount of electricity can only be predicted, not controlled.[29]

The energy industry must be able to build reliable, dispatchable baseload and peaking capacity electricity-generating plants in order to meet consumers' electricity demands on a 24 hour per day, 7 day per week basis, not just when the wind blows or the sun shines. Many states tasked with adding renewable capacity to meet an RPS are simply not equipped to generate enough capital, clear enough space, institute enough pollution controls, or site enough solar panels to do so. Renewable energy facilities presently are not an adequate substitute for (rather than in addition to) investment in conventional electricity generating facilities.

In sum, meeting even a 10 percent RPS by 2020—significantly less than any option currently being considered by Congress—is unrealistic, because (1) the sheer magnitude of the electricity that would have to be produced using renewable energy technology is just too great, (2) the cost to produce that energy is too prohibitive, and (3) there is not enough uniformity from state to state to support any combination of wind, photovoltaic and/or biomass energy.

[29] Global Energy Technology Strategy, *Addressing Climate Change - Phase 2 Findings From An International Public-Private Sponsored Research Program*, p. 86 (2007), *available at* http://www.pnl.gov/gtsp/publications.

IV. Relationship to State Portfolio Standards and Utility Regulation: How should the federal RPS be structured so as to interact efficiently with state standards; should agencies pass costs through to retail rates.

Because the Chamber is opposed to a federally mandated RPS, it is not possible to address how a federal RPS should interact with state renewable portfolio programs. Like the aforementioned discussion of tiers, eligibility and credits, there would be no need to parse between conflicting federal and state standards if there were no federal standard to consider.

With respect to rates, it is obvious that the very large costs of generating electricity using renewable energy technologies will be passed on to the consumer. The RPS would be, essentially, an indirect, regressive tax on the American public. Even if the required mix of renewable technology electricity generating capacity could be put in place—which is highly doubtful—the majority of electricity consumers, unless forced by law to chose otherwise, can be expected to opt for the lowest cost option in an unfettered market. And in 2020, the lowest-cost electricity generation option is still likely to be electricity generated by conventional means, as the price of energy generation by conventional means is low and is expected to lower further over the next 20 years. Considering the high costs of renewables and corresponding lack of demand, a mandatory RPS will force an additional tax on the consumer for an unnatural outcome not supported by the market.

V. Utility Coverage: Should any retail sellers be exempt from the RPS; should any standard apply to wholesale power markets or sales; should there be a basis for discretionary exemptions.

The question of exemption is a highly disturbing one, because it highlights the major flaw in an RPS: the choice of winners and losers. Regardless, the lack of federal involvement has essentially led to a very similar result as an exemption-based mandatory system: states with the capabilities to institute an RPS have taken it upon themselves to do so, while those incapable of supporting an RPS have not. The latter states, many of which suffer from impossibility of attainment, would be the same states seeking exemptions under a federal system.

VI. Administration and Enforcement: Should the RPS be federally enforced, and, if so, by whom; how would this enforcement interact with state portfolio requirement; what are recommended penalties for failure to meet the RPS.

Because the Chamber does not support a federally-mandated RPS, it is not possible to address whether an RPS should be federally enforced, and by whom. The Chamber categorically disapproves of penalties for failure to meet an RPS. Many states will not meet the RPS because of impossibility; to penalize these states and their constituents would be wrong, and potentially even unconstitutional.

VII. Credits and Trading: Should tradable credits for qualifying generation be utilized; if so, should the system be national in scope; should there be a cap on credit values to limit costs; and, how should credits be initially allocated.

Tradable credits are a particularly bad idea in the RPS context. Because certain states will always have to purchase credits (due to inability to produce enough renewable energy annually), and others will never have to purchase credits (for the opposite reason), the net result is a wealth transfer among states. Again, these costs will be passed on to the consumer, so the RPS would amount to a direct tax on electricity used by businesses and other consumers, driving up costs and hurting economic growth. There is also the potential for consumers to be double-taxed: once from an increase in rates in the state's attempt to meet the RPS, and again from penalties the state must pay or credits it must buy in order to meet the minimum standard.

In conclusion, the Chamber urges Congress not to pursue a mandatory federal RPS. Renewable generation sufficient to meet either requirement is neither cost-effective nor achievable nationwide, and a mandatory RPS could raise electricity prices for all consumers, result in a wealth transfer among states, and impose significant new burdens on the reliability of the nation's electric grid. Please feel free to contact me if you have any questions concerning the Chamber's response to your query. Thank you again for your interest in the Chamber's views on this very important matter.

Sincerely,

R. Bruce Josten