

# Why Susan Dudley is Dangerous for Energy Independence



*Susan Dudley, nominee for administrator of the Office of Information and Regulatory Affairs, has consistently opposed protections of the public health, safety, and environment. Here is a look at Dudley in her own words.*

## Fuel Economy

Why It Matters	What She Said
<p><i>In 1975, Congress passed the first fuel economy requirements over the objections of the auto industry, and every day our nation saves 2.8 million barrels of gasoline as a result. But in recent years, the industry has defeated several attempts to strengthen those standards, and since the late 1980s the average fuel efficiency of U.S.-made vehicles has actually fallen by more than a mile per gallon, due in part to the huge increase of inefficient light trucks.</i></p> <p><i>The United States is currently facing an energy crisis. National security, economic strength, natural resource conservation, and environmental health are all dangerously threatened by skyrocketing energy costs and the nation's dependence on foreign oil. Raising vehicle fuel economy standards is a proven and effective way to address this current crisis.</i></p>	<p><b>“Worst rule of 2003:</b> The National Highway and Traffic Safety Administration corporate average fuel economy (CAFE) standards for light trucks. <b>NHTSA continues to force vehicle manufacturers to achieve higher miles per gallon than the market would offer,</b> or consumers would choose, in the absence of the regulation. Absurdly, its economic model shows large net benefits to consumers even if markets are assumed to operate perfectly, i.e., without counting any externalities. We know this must be false, because <b>any regulatory constraints that forces consumers away from their preferred choices must have negative net benefits</b> (i.e., make Americans worse off).”<sup>1</sup></p>

## Energy Conservation Standards for Consumer Products

Why It Matters	What She Said
<p><i>The Department of Energy issues energy conservation standards for consumer appliances in order to ensure that inefficient appliances are removed from the market and consumers have access to less energy-intensive products. The average consumer will save money on energy costs over the life of the appliance.</i><sup>2</sup></p> <p><i>The typical American home spends 20% of its utilities bill on appliances.</i><sup>3</sup> <i>With energy costs currently sky rocketing, it is increasingly important to provide consumers with efficient appliances.</i></p>	<p><b>“The proposed standards will make consumers worse off. DOE’s analysis focuses purely on the cost savings to the average consumer, without adequately considering either different usage patterns, or the value consumers place on reliability, performance (especially dehumidification), or esthetics.”</b><sup>4</sup></p>

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<sup>1</sup> See Cindy Skrzycki, *2003's Bouquets and Brickbats (The Envelope, Please)*, WASH. POST, Dec. 29, 2003.

<sup>2</sup> Geller, Howard *National Appliance Efficiency Standards: Cost effective Federal Regulations*. Americans for an Energy Efficient America, 1995, A951

<sup>3</sup> U.S. Department of Energy, Energy Efficiency and Renewable Energy available at <http://www.eere.energy.gov/> accessed on August 17, 2006

<sup>4</sup> Dudley, Susan, Brian Mannix and Jennifer Zambone. *Public Interest Comment on the Office of Management and Budget's Draft Report to Congress on the Costs and Benefits of Federal Regulation*. Mercatus Center: May 28, 2002, p. A-19