

National Propane Gas Association

Summary and Analysis of Key January 2025 Executive Orders (EOs)

Unleashing American Energy

- The Administration’s [Unleashing American Energy](#) EO is among the most substantive for the propane industry, encouraging energy exploration, freedom of choice for appliances, limits on federal EV funding, and regulatory review of burdens to development of resources, including appliances.
- The EO eliminates the ‘electric vehicle mandate’ and promotes consumer choice by terminating state emissions waivers that function to limit sales of gasoline-powered automobiles and by considering the elimination of “unfair subsidies and other ill-conceived government-imposed market distortions that favor EVs.”
 - Expecting this action, on January 13, 2025, the California Air Resources Board (CARB) withdrew its request for a statutory waiver from the U.S. EPA that CARB would have required to implement its Advanced Clean Fleets (ACF) rule. With the ACF rule—which CA was poised to roll out in stages—shelved, carriers won’t soon have to comply with these emission regulations just to operate within CA.
 - This EO provides a policy tool for opposing ACF adoption in states.
- The EO promotes freedom of choice for appliances, including but not limited to dishwashers, washing machines, *gas stoves*, and *water heaters*.
 - This EO may be a helpful persuasive authority in NPGA’s ongoing cases challenging DOE appliance efficiency standards, e.g., non-condensing residential furnaces and water heaters (both residential and commercial).
 - This language will also be helpful in advocacy at the state and federal level in demonstrating the administration’s appliance-neutral and energy-neutral stance. It requires federal agency heads to review all existing regulations imposing an undue burden on the identification, development, or use of domestic energy resources.
- Agencies are to facilitate the permitting and construction of interstate energy transportation and other critical energy infrastructure, including pipelines.
- The U.S. Attorney General is to consider whether pending litigation against “illegal, dangerous, or harmful policies” should be resolved through stays or other relief.
 - This language may be helpful in NPGA’s cases challenging DOE appliance efficiency standards.
- It orders an immediate pause on disbursement of ‘Green New Deal’-related funds appropriated through the Inflation Reduction Act or Infrastructure Investment and Jobs Act.

- This language applies equally to vast pro-electric government dollars as well as comparatively smaller pro-gas dollars.
- NPGA will investigate reallocation of dollars directed towards propane buses and autogas fueling infrastructure and equipment.
- The EO orders accuracy in environmental analysis, including scaling back and eliminating calculations such as the social cost of carbon.
 - The “social cost of carbon” has been creeping into codes and standards proposals. It is a methodology that only takes into consideration site emissions, not the full fuel cycle, and has been used to force a reduced usage of carbon in the U.S. without similar reductions in countries that are designated as developing nations.

Declaring an Energy Emergency

- The Administration’s [Declaring An Energy Emergency](#) EO declares a national energy emergency, primarily based on high energy prices. It directs federal agencies to identify any emergency authorities they may have to facilitate the production or processing of energy.
- It encourages identification, leasing, siting, production, transportation, refining, and generation of domestic energy resources, including on Federal land.
- The EO orders agencies to facilitate the supply, refining, and transportation of energy in and through the West Coast of the United States, Northeast of the United States, and Alaska.
- This EO is particularly vague and repeatedly invokes emergency authorities, though the President’s power under these authorities is unclear. As several of the orders acknowledge, it may be necessary to undertake formal rulemakings under the Administrative Procedure Act for many of these actions.
- The most likely impacts to the propane industry are to promote the development and approval of propane infrastructure and to broaden authorization for and promote development of the use of propane as emergency backup fuel.

America First Trade Policy

- The Administration’s [America First Trade Policy](#) EO seeks to investigate the causes of U.S. annual trade deficits and the economic and national security implications and risks resulting from such deficits. It requires recommendations for appropriate measures to remedy such deficits.
- The EO requires an investigation into the feasibility of establishing an External Revenue Service (ERS) to collect tariffs, duties, and other foreign trade-related revenues.
- It asks the United States Trade Representative (USTR) to investigate unfair trade practices under the International Emergency Economic Powers Act, as well as to commence public consultation on the impact of the US-Mexico-Canada Agreement (USMCA). These practices are considered the precursor to potential tariffs.

- It seeks an investigation of the actions of China and an evaluation of the United States' trade relationship with China.
- It requires review of the effectiveness of the exclusions, exemptions, and other import adjustment measures on steel and aluminum.
- It requires assessment of migration and fentanyl flow from Canada, Mexico, and China and to recommend appropriate trade and national security measures to resolve.
- Investigation and recommendations are required by April 1, 2025.

America First International Environmental Agreements

- The Administration's [Putting America First in International Environmental Agreements](#) EO withdraws the U.S. from the Paris Agreement, an international treaty agreement from 2015 through the United Nations that established long-term temperature goals and pushed countries to limit carbon emissions. The withdrawal is effective immediately upon formal notification to the UN.
- President Trump also announced withdrawal from any agreement made under the United Nations Framework Convention on Climate Change (UNFCCC) as well as ceasing or withdrawing any funding made under the UNFCCC. In addition, the EO seeks to limit the financial contributions of the U.S. towards other countries for climate mitigation programs.
- This EO will ease long-term pressure on the propane industry from international trade and climate agreements that may dissuade the use of, or even eliminate, conventional fuels.

Emergency Price Relief

- The Administration's [Emergency Price Relief](#) EO proposes to end the "assault on plentiful and reliable American energy through unnecessary and illegal regulatory demands."
- Most critically to the propane industry, it proposes eliminating counterproductive requirements that raise the costs of home appliances.
 - This language may be extremely helpful to NPGA in its lawsuits challenging DOE-issued appliance standards and challenging any new Federal action that could impact appliance preference.
- It also proposes to eliminate "harmful, coercive climate policies" that increase the costs of food and fuel.

Regulatory Freeze Pending Review

- The Administration's [Regulatory Review Freeze](#) EO stops federal agencies from proposing or issuing any rule until such rule has been reviewed by an appointee or designee of the Trump Administration.
- It seeks to withdraw rules submitted for publication in the Federal Register, but not yet published, and to postpone for 60 days effective dates for any rules published in the Federal Register but not yet effective.

- The proposed rules most relevant to our industry likely subject to this EO are:
 - The Consumer Product Safety Commission’s Rule on Portable Generators.
 - The Consumer Product Safety Commission’s Rule on Furnaces related to carbon monoxide detectors.
 - The Occupational Safety and Health Administration’s Rule on Heat Illness and Injury Prevention.

Alaska Resource Potential

- The Administration’s [Unleashing Alaska's Extraordinary Resource Potential](#) EO will open up the Arctic National Wildlife Refuge (ANWR) for new oil and gas exploration leases, along with streamlining other infrastructure projects in the state.
- The EO directs prioritization of the development of Alaska’s natural gas reserves, including expediting the permitting process for necessary pipelines and export infrastructure.
- The impact to the propane industry will be more gas production. It also may help alleviate Alaska’s reliance on imported propane if local sources can be developed.

Offshore Wind Leasing

- The Administration’s [Outer Continental Shelf Offshore Wind Leasing](#) EO establishes a temporary pause on the Federal Government leasing out areas within the Outer Continental Shelf Lands Act (OCS) for offshore wind energy development.
- The EO is applied equally to both new and renewal requests for wind energy leasing. The order does not apply to leasing of OCS area for other energy development, including oil, gas, minerals, and environmental conservation.
- The EO also directs the Department of the Interior to conduct a review of all existing leases, and directs the Energy, Interior, and the EPA to evaluate the impact of offshore wind farms on local communities.

Executive Order Rescissions

- The Administration’s [Initial Rescissions of Harmful Executive Orders](#) EO seeks to undo numerous actions of the Biden Administration, including revocation of the following energy and environmental EOs (and revocation of any offices established therein).
 - **EO 13990 (Protecting Public Health and the Environment and Restoring Science to Tackle the Climate Crisis).** This EO required agencies to consider proposing suspending, revising, or rescinding actions taken during the first Trump Administration inconsistent with Biden’s energy and environmental policies, including action on (i) methane emissions in the oil and gas sector, (ii) fuel economy standards, (iii) appliance- and building-efficiency standards, and (iv) air pollution. The EO also required curtailment of leasing in the Arctic National Wildlife Refuge and revoked the March 2019 Permit for the Keystone XL Pipeline. It also required agencies to take into account the full costs of greenhouse

gas emissions, including “social cost of carbon” (SCC), “social cost of nitrous oxide” (SCN), and “social cost of methane” (SCM).

- The recession could impact positively efficiency standards in residential and commercial building codes.
 - It could also impact social cost of carbon calculations related to energy conservation, greenhouse gas emissions, and indoor air quality standards.
 - The current Administration’s position could be leveraged to advocate for a more level playing field by calling into question the need for adoptable appendices in codes and standards documents that would totally electrify buildings.
- **EO 13992 (Revocation of Certain Executive Orders Concerning Federal Regulation).** This EO revoked a number of first Trump Administration EOs that purportedly frustrated Biden policies on climate change, including, EO 13771 (Reducing Regulation and Controlling Regulatory Costs), EO 13777 (Enforcing the Regulatory Reform Agenda), EO 13875 (Evaluating and Improving the Utility of Federal Advisory Committees), EO 13891 (Promoting the Rule of Law Through Improved Agency Guidance Documents), EO 13892 (Promoting the Rule of Law Through Transparency and Fairness in Civil Administrative Enforcement and Adjudication), and EO 13893 (Increasing Government Accountability for Administrative Actions by Reinvigorating Administrative PAYGO).
 - **EO 14008 (Tackling the Climate Crisis at Home and Abroad).** This EO took a large number of actions to address a purported climate crisis, including domestic and foreign policy, e.g., rejoining the Paris Agreement; management of Federal procurement and real property, public lands and waters; financial programs to support robust climate action, federal clean electricity and vehicle procurement strategy; renewable energy on public lands and in offshore waters; oil and natural gas development on public lands and in offshore waters; avoidance of fossil fuel subsidies; clean energy in financial management; and environmental justice and economic opportunity.
 - **EO 14027 (Establishment of the Climate Change Support Office).** This EO established the Climate Change Support Office (CCSO) in the U.S. Department of State. The purpose of the CCSO was to support bilateral and multilateral engagement to advance the U.S. initiative to address the global climate crisis.
 - **EO 14030 (Climate-Related Financial Risk).** This EO set forth several actions to advance disclosure of climate-related financial risk.
 - **EO 14037 (Strengthening American Leadership in Clean Cars and Trucks).** This EO put forth a policy on clean and efficient cars and trucks, including rulemakings on (i) Light-, Medium-, and Certain Heavy-Duty Vehicles Multi-Pollutant and Fuel Economy Standards for 2027 and Later; (ii) Heavy-Duty Engines and Vehicles Multi-Pollutant Standards for 2027 and Later; and (iii) Medium- and Heavy-Duty Engines and Vehicles Greenhouse Gas and Fuel Efficiency Standards as Soon as 2030 and Later.

- **EO 14052 (Implementation of the Infrastructure Investment and Jobs Act).** This EO required that all agencies in implementing the IJA shall prioritize: investing public dollars efficiently, working to avoid waste, and focusing on measurable outcomes for the American people; increasing the competitiveness of the United States economy, including through implementing the Act's Made-in-America requirements and bolstering United States manufacturing and supply chains; improving job opportunities by focusing on high labor standards for these jobs, including prevailing wages and opportunity to join a union; investing public dollars equitably, including through the Justice40 Initiative; and building infrastructure that is resilient and that helps combat the crisis of climate change.
- **EO 14057 (Catalyzing Clean Energy Industries and Jobs Through Federal Sustainability).** This EO affirmed that it is U.S. policy that the Federal Government lead by example to achieve a carbon pollution-free electricity sector by 2035 and net-zero emissions economy-wide by no later than 2050. Each agency was required to meet numerous goals, including: 100% carbon pollution-free electricity on a net annual basis by 2030, including 50% 24/7 carbon pollution-free electricity; 100% zero-emission vehicle acquisitions by 2035, including 100% zero-emission light-duty vehicle acquisitions by 2027; a net-zero emissions building portfolio by 2045, including a 50% emissions reduction by 2032; reduction in scope 1 and 2 greenhouse gas emissions from Federal operations by 2030; net-zero emissions from Federal procurement; climate resilient infrastructure and operations; and a climate- and sustainability-focused Federal workforce.
- **EO 14082 (Implementation of the Energy and Infrastructure Provisions of the Inflation Reduction Act of 2022).** This EO provided that in implementing the IRA all agencies shall prioritize: driving progress to achieve U.S. climate goals to reduce greenhouse gas emissions 50-52% below 2005 levels in 2030, achieve a carbon pollution-free electricity sector by 2035, and achieve net-zero emissions by no later than 2050; advancing environmental and climate justice through promoting construction of clean energy generation, storage, and transmission, and enabling technologies through efficient, effective mechanisms that incorporate community engagement; increasing the competitiveness of the U.S. economy and investment in critical supply chains; accelerating innovation by directing the scientific and technical expertise of America's researchers, businesses, and workers toward achieving breakthroughs in clean energy and climate technologies; and effectively coordinating with State, local, Tribal, and territorial governments, as well as with private-sector stakeholders and nongovernmental organizations, in implementing the critical investments to build sustainable, resilient communities.
- **EO 14096 (Revitalizing Our Nation's Commitment to Environmental Justice for All).** This EO provided that each agency should make achieving environmental justice part of its mission. It sets forth several steps including identifying, analyzing, and addressing disproportionate and adverse human health and environmental effects (including risks) and hazards of Federal activities, including those related to climate change and cumulative impacts of environmental and other burdens on communities with environmental justice concerns.