DOGE

Department of Government Efficiency

# DOGE

Deregulation Opportunity

July 1, 2025



#### THE PROBLEM

#### Overregulation is Costing America \$Trillions Annually

#### \$3.1 Trillion

Compliance cost/year representing 12% of GDP

\*NAM Crain Study of 2023

#### \$1.2 Trillion

Reduced investment regulations estimated to lower external investment by \$650B, and lower corp reinvestment by \$550B

#### \$2.2 Trillion

Lower Sales Revenue
Estimated to be \$1.98 Trillion in
lost US Sales and \$220 Billion
in lower exports

#### \$175B

Higher Fed Costs
Excess Regulations - an
estimated \$100-\$250 Billion in
costs to manage and control

#### THE OPPORTUNITY

# 50% of All Federal Regulations Can Be Eliminated - Yielding Potential \$3.3T Per Annum Value Opportunity

## \$1.5 Trillion Compliance Saving/Year

## \$600 Billion Unlocked Investment

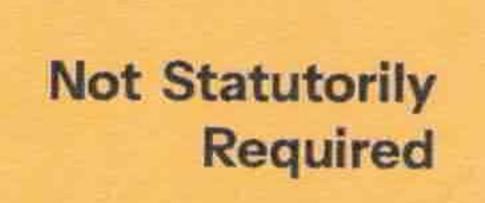
## **\$1.1 Trillion**Revenue Potential

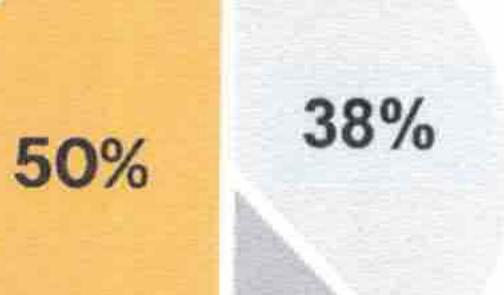
## \$85 Billion Fed Budget Reduction

#### FEDERAL REGULATIONS

\*100,000 Regulatory Sections of the 200,000+ can be deleted

\*Source: DOGE Al Solution





Statutorily Required

Not Required but Agency Needs

#### THE CHALLENGE

#### Deregulating Today Involves Significant Man Hours

#### Average Hours Required Per Regulatory Section



Key Finding: 3.6 million man-hours to deregulate 100,000 sections

#### THE SOLUTION

#### DOGE Al Program Saves 93% of Man Hours

#### **How Does it Work?**

- Creates a regulation/statute database, and determines which regulations are required
- Enables agencies to comment and modify to result in a <u>final delete list</u>

Automatically drafts all submission documents for attorneys to edit

Automatically analyzes 20 to 500,000 citizen comments for Final Rule inclusion

#### CASE STUDIES & VETTING

# Case Studies with DOGE Al Deregulation Decision Tool

- CFPB 100% of Deregulations Written Using the Tool
- HUD Policy Team Completed Decisions on <u>1,083 Regulatory Sections in Two</u> <u>Weeks</u>
- Vetted and Endorsed by DOGE Lawyers: Austin Reynor, James Burnham, Jacob Altic, and Ashley Boizelle

### ASK: RELAUNCH AMERICA ON JAN 20, 2026

# Set Sept 1 Goal for All Agencies to Complete the DOGE Al Deregulation List

- Every agency can do it in less than four weeks with existing staff
- 2. From this DOGE will roll-up a delete list of 50% of all Federal Regulations (100k Regulatory Rules)
- Sets in Motion the Acceleration Moving Deregulations through the Process with Automation

# Appendix

### Selection from the Al Results: Is the Regulation Statutorily Required

Section Content Summary	Core Statutory Provisions	Statutorily Required?	Statutorily Required Explanation	Program Group Response to 'Statutorily Required'	Program Group Statutorily Required Explanation
This regulatory section establishes procedures for raising and considering price squeeze issues in wholesale electric rate proceedings before the Federal Energy Regulatory Commision. It outlines the elements of a prima facie case for price discrimination, data request protocols, and the burden of proof, to implement the Supreme Court's decision in F.P.C. v. Conway Corp.	Federal Power Act, section 205(e), 42 U.S.C. § 7172(a)(1)(A), 16 U.S.C. § 2601 (2)	YES	Rulemaking is mandated because this section implements the Supreme Court's decision in F.P.C. v. Conway Corp., which affirmed the Commission's authority under the Federal Power Act (FPA) to consider price squeeze allegations. The Conway decision, while affirming jurisdiction, did not prescribe specific procedures. Therefore, regulations establishing a procedural framework—including elements of a prima facie case (§ 2.17(a)), data exchange (§ 2.17(b)-(d)), and application of the burden of proof (§ 2.17(e))—are strictly implicitly necessary to operationalize the Commission's statutory duties under the FPA as interpreted by Conway, ensuring consistent and efficient resolution of complex price squeeze issues.		

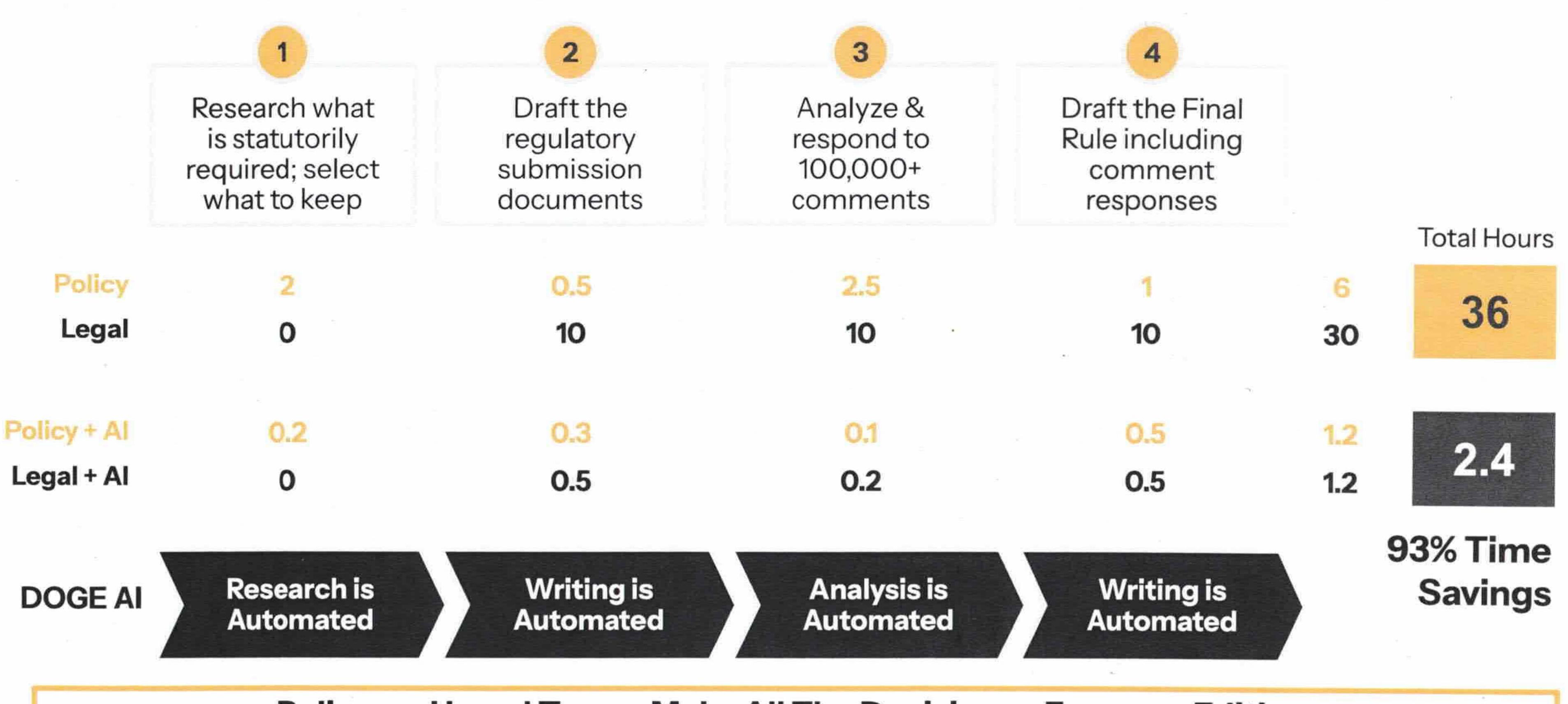
#### Selection from the Al Results: Can Part of the Statute be Eliminated

Non Compliant Subclauses	Non Compliant Text	Non Compliant Explanation (based on Loper Bright + EO14219)
	1. § 2.17(e) "The burden of proof (i.e. the risk of nonpersuasion) to rebut the allegations of price squeeze and to justify the proposed rates are on the utility proposing the rates under section 205(e) of the Federal Power Act."  2. § 2.17(a)(4) "The wholesale customer's prospective rate for comparable retail service, i.e. the rate necessary to recover bulk power costs (at the proposed wholesale rate) and distribution costs;"	[§ 2.17(e)] [Criterion 8] This subsection states that the burden of proof to rebut price squeeze allegations and justify proposed rates is on the utility, citing section 205(e) of the Federal Power Act as authority. Section 205(e) of the Federal Power Act as authority. Section 205(e) of the Federal Power Act (analogous to section 4(e) of the Natural Gas Act, 15 U.S.C. §717 c(e)) generally places the burden on the utility to show that any increased rate or charge is just and reasonable. If, as is highly probable, FPA section 205(e) already clearly establishes this burden of proof on the utility in any proceeding involving its proposed rates, then § 2.17(e) merely restates this statutory mandate without adding substantive clarification, interpretation, or implementation detail specifically necessary for the price squeeze context that wouldn't already be apparent from the statue itself. Therefore, it is redundant.  [2.17(a)(4)] [CREATION OF LEGAL TEST/FRAMEWORK] Criterion 1, Criterion 7: This clause, requiring a wholesale customer at the prima facie stage to specify its 'prospective rate for comparable retail service, i.e. the rate necessary to recover bulk power costs (at the proposed wholesale rate) and distribution costs,' exceeds the reasonable scope necessary to implement the mandate from F.P.F. v. Conway Corp. to consider price squeeze allegations. It imposes a significant and complex analytical burden, akin to a mini-rate case, on the intervenor merely to have its price squeeze allegation considered. This level of detail is not reasonably necessary for an initial showing and may unduly burden smaller wholesale customers (Criterion 7) by creating a high barrier to entry for raising legitimate claims, thereby going beyond the scope of simply operationalizing the Conway mandate (Criterion 1).
	3. § 2.17(a)(5) "An indication of the reduction in the wholesale rate necessary to eliminate the price squeeze alleged."	[2.17 (a)(5)] [CREATION OF LEGAL TEST/FRAMEWORK] Criterion 1, Criterion 7: This clause, requiring 'an indication of the reduction in the wholesale rate necessary to eliminate the price squeeze alleged' as part of a prima facie case, exceeds the reasonable scope necessary to implement the mandate from F.P.C. v. Conway Corp. It compels the intervenor to propose a specific remedy before full discovery or development of the record. Determining the precise rate reduction needed to eliminate a price squeeze is a complex task that typically follows a finding of a price squeeze, not as a prerequisite to alleging one. This requirement places a premature and potentially heavy analytical burden on intervenors, especially smaller entities (Criterion 7), and is not reasonably necessary to simply trigger Commission consideration of a price squeeze allegation (Criterion 1).

#### CAPABILITY

#### The DOGE Al Solution Increases Output by 15X

#### De-Regulation Average Time Required Per Regulatory Section



Policy and Legal Teams Make All The Decisions - Focus on Editing

#### TIMELINE

# 50% of All Regulations Eliminated is an Audacious Goal that Requires Only the Will to Prioritize It

July 2025

#### Prep Agencies

Doge team
trains agencies
on use of
solution and
best practices.
POC agencies
delivered.

August

#### Agency Deletion Plans

Agency Policy and Exec Teams review Al suggested deletions and finalize plan September

## Create NPRM Docs

Attorney teams edit the NPRMs and DFRs and submit to OIRA

October

#### OIRA Approvals

OIRA operates on fast-track approach to approve deregulations at scale November

# Comments - Final Rules

Attorneys
review 30-day
comment
analysis and
submit final
rules

December

## Comments - Final Rules

Attorneys review 60-day comment analysis and submit final rules

The 50% deregulation goal is clearly within reach with the DOGE AI Solution

The hours required are available within the existing staff at each agency