

Episode 57DHWM June 11 2025 Rooftop Solar Could Crash Under the Republican Tax Cut Bill

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[0](#) RAWSEP View Gutting of a vaccine policy committee by RFK Junior leaves in limbo whether a COVID Vaccine will be available in Fall of 2025 The Republican Tax Cut for the Rich Bill threatens residential clean energy Rooftop Solar A new Wildfire in the San Bernardino Mountains of California continues the wood burning air pollution experienced in 2025 so far A Grid Management system heavily influenced by corporations to the disadvantage of consumers is causing a surge in energy costs over several states The Trump EPA is trying to erase Greenhouse Gas limits on Power Plants in the United States which will further contribute to unnecessary air pollution The Trump government is keeping open Coal and Gas plants that were planning to close and those Coal and Gas Plants did not request that they be kept open In New Zealand hundreds of lawyers are joining a lawsuit against the government over a dangerously inadequate emissions reduction plan Focus on the chaotic Trump Tariffs and other Trump Actions may make these developments directly threatening increased air pollution easy to ignore in the confusion and panic of dealing with day to day imminent Trump threats to the safety and livelihood of average Americans

[1](#) RFK Jr guts the U S vaccine policy committee The system is becoming unrecognizable Excerpts edited by RAWSEP for brevity and clarity and relationship to Residents Against Wood Smoke Emission Particulates a 501c3 nonprofit organization Your Local Epidemiologist Jun 10 2025 Well He did it In an unprecedented and deeply alarming move Secretary Robert F Kennedy Jr has removed every single member of the vaccine policy committee of the nation the Advisory Committee on Immunization Practices ACIP and announced plans to handpick their replacements In other words someone with an established track record of ignoring reality made the unilateral ideological decision to gut one of the most trusted and effective pillars of the American vaccine infrastructure A system that helped eliminate smallpox drastically reduce childhood diseases safeguard schools expand insurance coverage and save millions of lives A system that empowered 90% of Americans to protect their children and families confidently It is now becoming unrecognizable Unfortunately I am not surprised but I am deflated and deeply concerned Not just about what this means for the future but what it signals right now What we know For 64 years ACIP has been the backbone of vaccine policy in the U S guided by scientific processes transparency and collaboration Its members are independent experts in pediatrics immunology vaccinology and epidemiology who review the evidence to recommend who should receive which vaccines and when It is a critical step in ensuring vaccines are safe and effective The normal times federal process of checks and balances to get a vaccine from a clinical trial into your arm Figure by Your Local Epidemiologist ACIP appointments have always been somewhat opaque but each member is rigorously vetted for conflicts of interest Once appointed members participate in a remarkably open process Meetings are live streamed presentations and data are posted online conflicts of interest are disclosed and public comment is not just accepted it is required by law Historically this process has been grounded in the nonpartisan belief that vaccine policy should be shaped by science experience and diverse perspectives not ideology This has changed The Secretary of Health a man named one of the Disinformation Dozen by the Center for Countering Digital Hate now controls the levers

of federal vaccine policy and is pulling them fast based on his decades of false beliefs about vaccines
It does not take much to counter his talking points yesterday No ACIP does not have undisclosed conflicts of interest RFK Jr reaffirmed this process himself after he called for a full review of the disclosures of the current committee Nothing was found No ACIP is not paid by big pharma An investigation in March 2025 found no systemic evidence of undue pharmaceutical company influence on the members Yes ACIP has voted against a vaccine Some examples include Rota Shield 1999 nasal influenza vaccines 2016 2017 Johnson and Johnson Covid 19 vaccine 2021 This move is the latest in a broader arc of undermining the long standing process for assessing and approving vaccines in the United States rolling back Covid 19 vaccine eligibility bypassing FDA processes imposing impossible standards and pushing cherry picked incomplete AI generated policy statements These moves have already prompted the resignations of senior vaccine officials at the CDC and FDA citing misinformation and the abandonment of science What we do not know There is no new committee yet no timeline no public process Just a Wall Street Journal op ed and a power vacuum How this will affect you your family or your community is not clear yet We are at the mercy of what comes next There is a spectrum of scenarios that could play out Best case RFK Jr appoints qualified independent experts committed to the science The committee resumes its work Vaccine guidance remains credible and intact Worst case He fills ACIP with anti vaccine ideologues Recommendations are completely removed and so is your access to vaccines Most likely Somewhere in between But given his history the tilt is obvious There is also a real possibility Kennedy overplayed his hand Many Americans across the political spectrum value vaccines access and the ability to protect their children families and communities Senator Bill Cassidy a Republican physician cast the deciding vote to confirm Kennedy based on personal assurances that ACIP would remain untouched That promise is now broken A lot of this is on him Will he respond? And if this becomes a political liability for Trump does it suddenly become not worth the fight? What is at stake If ACIP remains dismantled loses credibility or recommendations for vaccinations are changed by the new committee there is a cascade of consequences we will have to grapple with Insurance coverage ACIP recommendations are the basis for what vaccines insurers must cover Coverage could be withdrawn without structure confidence or if ACIP becomes politicized Some insurers may continue to pay out of pragmatism Mis cheaper than measles treatment but others may not Vaccines for Children VFC program Nearly half of all U S children rely on this program for free vaccines ACIP determines what is included Remove the committee or gut its recommendations and millions of children may lose access to routine protection State fragmentation Most states follow ACIP guidance Without a federal anchor states could splinter creating their own advisory boards issuing inconsistent recommendations and fueling a patchwork of policies that open the door to outbreaks Above all the lines between truth and falsehood have never been more blurred for families and clinical care teams This alone could profoundly impact the American ability to make evidence informed decisions Confusion is the point and it could further sow doubt reduce vaccine uptake and put lives at risk What to watch The next few weeks will tell us more Who is on the new committee and how quickly will they appear? The faster it is announced the more likely the appointments are ideological Will the June 25 to 27 ACIP meeting move forward and what happens if it does? How will Cassidy the HELP Senate Committee who oversees RFK Jr and Congress respond? The fall respiratory season is quickly approaching and it is critical that we get clear answers soon so Americans have the information they need access to options and the confidence to get vaccinated Timing is everything I will be watching closely and will keep you updated Bottom line The Kennedy decision marks a dangerous turning point Whether vaccine policy in America is shaped by science or ideology The structures that once supported science informed vaccine decision making are becoming unrecognizable through calculated dismantling flooding the zone with confusion and sowing just enough doubt to paralyze public health decision making We should all be paying attention Because what happens next will determine whether your child or your community has the choice of life saving protection And whether scientific processes still have a place in shaping our future Love YLE PS After the news broke yesterday my

friend Doctor Jeremy Faust at Inside Medicine asked if we should talk it out live on Substack It was raw but we went for it after a deep breath and 5000 of you showed up with zero notice thank you! [Watch the recording here](#) We are taking our son in for his annual wellness visit this week ... already we have a list of questions for the pediatrician related to how soon we can get certain vaccinations if he kid is 10 This is so so scary sad Newsletter of Greg this is all part of the Kennedy personal agenda to destroy public health as it exists at the federal state local tribal and territorial levels [I have no doubt that Kennedy will try to fill ACIP with experts who are not recognized as being an authority in the fields of virology immunology pediatrics infectious disease et cetera](#) None of them will be expert but they all will be critics who have nothing more to offer than their subjective opinions

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2D Headlines The Guardian June 10 2025 Austria Violence Austria reels from national tragedy after gunman kills 10 at former school Austria The Guardian **Air Pollution New Zealand government sued over dangerously inadequate emissions reduction plan New Zealand The Guardian** Medicine and Health Doctors dismissed my pain I eventually discovered I had a rare tumor Well actually The Guardian Medicine and Health RFK Jr to remove all members of CDC panel advising on US vaccines Trump administration The Guardian Medicine and Health The RFK Junior clean sweep of CDC vaccine panel experts will erode public trust Trump administration The Guardian **Musk The Trump Musk feud exposes the American wealth hoarding crisis Gabriel Zucman The Guardian** Musk Unstoppable force loses battle with immovable object Elon bows to Trump Technology The Guardian

3 Why Rooftop Solar Could Crash Under the G O P Tax Bill Federal tax breaks have fueled a boom The House bill would end that immediately **Excerpts edited by RAWSEP for brevity and clarity and relationship to Residents Against Wood Smoke Emission Particulates a 501c3 nonprofit organization** The New York Times June 11 2025 502 a m ET Over the past two decades more than 5 million U S households from California to Georgia to Maine have put solar panels on their roofs drawing energy from the sun and reducing their electric bills But that could soon come to a crashing halt The big domestic policy bill passed by House Republicans last month would by the end of this year eliminate tax credits for homeowners and solar leasing companies that have fueled the popularity of rooftop solar If it becomes law it would lead to an immediate plunge in installations analysts and companies say This sets us back said Ben Airth policy director for Freedom Forever one of the largest residential solar installers in America I have been in this industry 22 years and remember when it was only rich people doomsday preppers and environmentalists installing solar panels on their roofs One analysis by Ohm Analytics an energy data firm estimates that residential solar installations could fall by half next year if the House bill becomes law Without the tax credits it would take 17 years on average for homeowners to earn back their solar investments A more pessimistic analysis by Morgan Stanley projects that rooftop solar demand could fall by 85 percent through 2030 At some point our solar industry can and should be able to function without tax credits said the co founder of Aurora Solar a software company that designs home solar systems I do think we could get on board with a phase down of these credits over an appropriate time period that gives us time to figure out how to find efficiencies and lower costs But an overnight change would be devastating It is just not possible to adapt that quickly

4 Wildfire Near San Bernardino Mountains Prompts Evacuation Orders The fire which was burning near the town of Apple Valley had exploded to over 4000 acres since starting on Tuesday afternoon **Excerpts edited by RAWSEP for brevity and clarity and relationship to Residents Against Wood Smoke Emission Particulates a 501c3 nonprofit organization** The New York Times June 11 2025 A wildfire that started on Tuesday afternoon north of the San Bernardino Mountains in Southern California had exploded to over 4000 acres by nighttime driven by high winds and dry conditions officials said It had prompted evacuation orders and was threatening multiple properties officials said The vegetation fire was threatening multiple buildings in and around Apple Valley a town of about 75000 people about 60 miles northeast of downtown Los Angeles according to the California Department of Forestry and Fire Protection Firefighters were battling to contain the blaze which was zero percent contained on Tuesday night The San Bernardino Sheriffs Department issued an evacuation order for an area about four miles wide on the edge of the town warning of an extreme threat to life A number single story homes and some ranches appeared to be within the evacuation zone The fire broke out at about 230 p m according to Cal Fire and its cause was under investigation

5 We have got to become an aggressively populist party Chris Murphy on the task facing Democrats The Connecticut senator is urging colleagues to take risks to confront Trump and show voters a less judgmental face **Excerpts edited by RAWSEP for brevity and clarity and relationship to Residents Against Wood Smoke Emission Particulates a 501c3 nonprofit organization** The Guardian June 11 2025 Murphy is one of the most outspoken voices in the Democratic opposition to Trump He calls on Democrats to embrace populism urges his colleagues to take risks and makes clear that he is not yet

even thinking about 2028. We have got to look ourselves in the mirror and ask how can we claim that we are the party of poor people if poor people are not voting for us? There is a lot of conservative poor people out there who think that our party is way too judgmental. We have got to become a bigger tent party when it comes to a lot of social and cultural and hot button issues and then we have got to become an aggressively populist party. Democrats have been soul searching since November when they saw a further erosion of support among the working class. Trump won 56% of voters without a college degree compared with 42% who chose Kamala Harris a decline from 2020 when Trump and Joe Biden were about even. Our focus needs to be on making work pay giving power to people. Biden delivered an economic agenda that was bigger in scope and scale than many expected with input from the progressive senator Bernie Sanders and impetus from the crisis of the Covid 19 pandemic. But Murphy senator for Connecticut argues that it failed to give people a sense of empowerment. We did some good things for poor people in the last Congress but they were largely seen as handouts the child tax credit student loan repayment enhanced Obamacare subsidies good policy but it ended up feeling very unfulfilling to people to have the government write them a cheque to paper over the fact that work does not pay. Our focus needs to be on making work pay giving power to people. That is what they want to feel people want to feel powerful. They do not want to feel like you have to subsidize them. That is a higher minimum wage stronger labor unions fairer work rules the deconcentration of economic power the blowing up of the monopolies. The sense of relative peace and security of the postwar transatlantic alliance is drawing to a close as evidenced by the Trump moral equivocation over the Russian war in Ukraine. Murphy does not attempt to sugar coat it. We are not a dependable partner right now and so I do not think there is any path for US leadership to magically reappear in the next three years. That matters most for Ukraine. I do not mean to be unnecessarily pessimistic but I think Trump has made the decision to not just abandon Ukraine but humiliate Ukraine. To the extent Ukraine survives over the next three and a half years that is largely going to be because our European allies do something heroic and important.

6 As Energy Costs Surge Eastern Governors Blame a Grid Manager Anger at PJM which manages the electrical grid in all or parts of 13 states and the District of Columbia has been boiling over in some state capitals. Over the last 100 years the PJM grid has grown to encompass all or parts of 13 states and the District of Columbia. **Excerpts edited by RAWSEP for brevity and clarity and relationship to Residents Against Wood Smoke Emission Particulates a 501c3 nonprofit organization**. The New York Times June 10 2025. For decades a little known nonprofit organization has played a central role in keeping the lights on for 65 million people in the Eastern United States. Even some governors and lawmakers acknowledge that they were not fully aware of how much influence the organization PJM has on the cost and reliability of energy in 13 states. The electrical grid it manages is the largest in the United States. But now some elected leaders have concluded that decisions made by PJM are one of the main reasons utility bills have soared in recent years. They said the organization had been slow to add new solar wind and battery projects that could help lower the cost of electricity. And they say the grid manager is paying existing power plants too much to supply electricity to their states. Some governors have been so incensed that they have sued PJM drafted or signed laws to force changes at the organization or threatened to pull their states out of the regional electric grid. The Democratic governors of Delaware Maryland New Jersey and Pennsylvania sharply criticized the organization in written statements. And the Republican governor of Virginia Glenn Youngkin called on the organization to fire its chief executive in a letter. PJM has lost the plot Governor Philip D Murphy of New Jersey said in an interview. In another interview Gov. Wes Moore of Maryland said about PJM I am angry. The elected leaders some of whom may run for president in 2028 and their aides said the PJM executives board members and committees made many important decisions in secret. And too many decisions like whether to make it easier or harder for new power projects to join the grid effectively benefit established energy companies at the expense of residents and businesses that use electricity. The fury of the governors at PJM is part of broader frustrations expressed by elected officials residents and businesses over US grids. After decades of modest and gradual rate increases the price of power has climbed relentlessly over the last several years. The cost of electricity for residents of

Delaware Maryland New Jersey Pennsylvania and Virginia has increased from 23 to 40 percent over the last five years. Energy costs rose sharply after natural gas prices spiked when Russia invaded Ukraine in 2022. But electricity rates continued to climb after that shock because energy demand is growing rapidly driven largely by new data centers. In addition power outages have become more frequent because utility equipment had been poorly maintained and was not upgraded for more intense natural disasters linked to climate change. A spokesman for PJM said the organization was sensitive to the concerns of the governors but noted that it was regulated by a federal agency. The opinions of our governors are very important to PJM and we share their concern about increasing electricity prices a phenomenon occurring across much of our country said the spokesman. PJM has no profit motive no shareholders and no share price. We are fully regulated by the Federal Energy Regulatory Commission and cannot make any major changes without that approval of the body. When it was formed in 1927 the organization was meant to connect the operations of three utilities in Pennsylvania and New Jersey. Utilities in Maryland were later added forming the Pennsylvania New Jersey Maryland Interconnection or PJM. Working together allowed the utilities to share resources cutting costs. The main job of the organization is to oversee the flow of energy over transmission lines that carry electricity from power plants to cities and towns. PJM also devises and enforces policies about when and which types of power plants are added to the grid. Over nearly 100 years the PJM grid has grown to encompass all or parts of 13 states and the District of Columbia stretching roughly from Chicago to Virginia Beach. PJM has a nine member board of managers all of whom have worked in the energy industry or in other senior corporate jobs. It also has more than 1000 voting members most of which are utilities power plant companies transmission line owners and energy traders. Most of those voting members have a direct financial stake in the PJM decisions. Members typically vote on policies and issues. Some of the member votes are public but others including at smaller committee meetings where preliminary decisions are made are not. PJM is one of seven large US grid operators. Each functions differently. Some are confined to single states like California and Texas and their boards answer to state officials. California is considering expanding the authority of its grid manager to include other Western states under a PJM style model. Other grid managers function like PJM as independent organizations that pick their own board members and chief executives with no input from governors. What the problem is at PJM is that it is controlled and influenced by the corporate energy companies that constitute its membership said the director of the energy program at Public Citizen a nonprofit research and consumer group started by Ralph Nader. It puts energy company lobbyists at PJM first. Last month PJM announced that its chief executive Manu Asthana would step down by the end of 2025. The organization said the decision had preceded the Youngkin letter. We are spending our time talking about the wrong things. Asthana said in a statement. Prices are up because of tightening supply and demand driven by generator retirements and data center growth and it is impacting consumers. We need to be working together on additional ways to bring supply onto the system rapidly.

7 Documents Show E P A Wants to Erase Greenhouse Gas Limits on Power Plants The agency plans to argue that carbon emissions from power plants do not contribute significantly to climate change. Scientists disagree. Excerpts edited by RAWSEP for brevity and clarity and relationship to Residents Against Wood Smoke Emission Particulates a 501c3 nonprofit organization. The New York Times. May 24 2025. The Environmental Protection Agency has drafted a plan to eliminate all limits on greenhouse gases from coal and gas fired power plants in the United States. In its proposed regulation the agency argued that carbon dioxide and other greenhouse gases from power plants that burn fossil fuels do not contribute significantly to dangerous pollution or to climate change because they are a small and declining share of global emissions. Eliminating those emissions would have no meaningful effect on public health and welfare the agency said. But in the United States the power sector was the second biggest source of greenhouse gases behind transportation according to the most recent data available on the E P A website. And globally power plants account for about 30 percent of the pollution that is driving climate change. The E P A sent the draft to the White House for review on May 2. It could

undergo changes before it is formally released and the public is given the opportunity to offer comments likely in June. The E P A plan is likely to face lawsuits once it is finalized. If it survives it could block future administrations from regulating carbon dioxide emissions from power plants eliminating a tool that Democratic administrations have relied on to tackle climate change. It also could make it easier to unravel other climate regulations some experts said. If the administration is going to do this it is the strategically smartest way said a conservative law professor at Case Western University. If they are successful with regard to power plants they are pretty much going to be successful with everything else he said.

8 Coal and Gas Plants Were Closing Then Trump Ordered Them to Keep Running The grid operators that draw power from the plants said they never asked for them to remain open and consumers may have to absorb extra costs. Excerpts edited by RAWSEP for brevity and clarity and relationship to Residents Against Wood Smoke Emission Particulates a 501c3 nonprofit organization. The New York Times June 6 2025. A 63 year old coal fired power plant was scheduled to permanently close its doors in Michigan on June 1 2025. So was an oil and gas powered plant that was built in the 1960s in Pennsylvania. But at the last minute the Trump administration ordered both to stay open. The orders came as it pursues a far reaching plan to boost fossil fuels including coal by declaring a national energy emergency. The grid operators in Michigan and Pennsylvania said they had not asked for the orders and had not planned on using the plants this summer. The costs to keep the plants open which could total tens of millions of dollars are expected to fall on consumers. Experts have said there is little evidence of a national energy emergency and 15 states have sued to challenge the Trump declaration which was issued the day he took office. The emergency orders which came last month surprised the companies that operate the plants and they are now scrambling to delay some retirements of workers and reverse nearly complete plans to shutter their facilities. In Michigan the plant operator raced to buy enough coal to power operations. The episode marks a highly unusual use of the emergency powers of the Energy Department under the Federal Power Act. In the past the department has typically issued emergency orders at the request of regional grid operators to stabilize the power supply during extreme weather events and blackouts. The chair of the Michigan Public Service Commission said he estimated that the 90 day order to keep the coal plant open would cost ratepayers tens of millions of dollars. What was surprising about this order is that nobody was asking for it he said. The grid operator was not asking for this plant to be kept online. The utility that owns and operates the plant was not asking for the plant to be kept online the state was not asking for the plant to be kept online. The Michigan attorney general a Democrat said she was certainly considering challenging the order affecting the coal plant in her state. We think this is par for the course with the Trump administration. They are abusing emergency authorities and really manufacturing an emergency that does not exist in a way that is really unprecedented. Public Citizen a consumer advocacy organization also plans to challenge the orders according to the energy program director. In a The Energy Department has issued several dozen emergency orders since 1935. These orders have typically come in response to acute weather emergencies like extreme heat hurricanes wildfires and extreme cold. In May the Trump administration issued three such orders. Two kept fossil fuel power plants open past their retirement dates and a third added more fossil fuel generation to the ailing grid of Puerto Rico.

9 New Zealand government sued over dangerously inadequate emissions reduction plan In the first legal challenge to the plan top climate lawyers claim the government relies too heavily on forestry and failed to consult the public. Excerpts edited by RAWSEP for brevity and clarity and relationship to Residents Against Wood Smoke Emission Particulates a 501c3 nonprofit organization. The Guardian June 9 2025. Hundreds of top environment lawyers are suing the New Zealand government over what they say is its dangerously inadequate plan to reduce emissions to net zero by 2050. It is the first time the emissions reduction plan of New Zealand has faced litigation and the lawyers believe it is the first case globally that challenges the use of forestry to offset emissions. Lawyers for Climate Action NZ and the Environmental Law Initiative two groups representing more than 300 lawyers filed judicial review.

proceedings against the government in the Wellington high court on Tuesday. The groups argue the government has abandoned dozens of tools to tackle emissions, failed to adequately consult the public and too heavily relies on high risk carbon capture strategies such as forestry. The government plan was fundamentally unambitious and a dangerous regression for the country, the president of Lawyers for Climate Action NZ said. The plan must be robust and transparent in line with the chief climate law of New Zealand, the climate change response zero carbon amendment act. There is hope that this case will force the government to come up with a new plan. The reason why we take a case like this to a court is to scrutinize and question whether the government statements match up with reality.

10 The Trump Musk feud exposes the American wealth hoarding crisis. The Tesla boss wields power no one person should have. But there is a way to fix the problem. Excerpts edited by RAWSEP for brevity and clarity and relationship to Residents Against Wood Smoke Emission Particulates a 501c3 nonprofit organization. The New York Times, June 10 2025. As the world watches Trump and Elon Musk publicly fight over the sweeping legislation moving through Congress we should not let the drama distract us. There is something deeper afoot: unprecedented wealth concentration and the unbridled power that comes with such wealth has distorted our democracy and is driving societal and economic tensions. Musk, the richest man in the world, wields power no one person should have. He has used this power to elect candidates that will enact policies to protect his interests and he even bought his way into government. While at the helm of Doge Musk dramatically reshaped the government in ways that benefit him, for instance slashing regulatory agencies investigating his businesses and hollowed out spending to make way for tax cuts that would enrich him. Musk is just one example of the ways in which unchecked concentration of wealth is eroding US democracy and economic equality. Just 800 families in the US are collectively worth almost \$7 trillion dollars, a record-breaking figure that exceeds the wealth of the bottom half of the US combined. While most of us earn money through labor, these ultra-wealthy individuals let the tax code and their investments do the work for them. Under the current federal income tax system, over half of the real world income available to the top 0.1% of wealth holders, those with 62 million dollars or more, goes totally untaxed. As a result, billionaires like Elon Musk and Jeff Bezos have gotten away with paying zero dollars in federal income taxes in some years, even when their real sources of income were soaring. On the other side, millions of hard-working Americans are struggling to make ends meet. Their anxiety is growing as tariffs threaten to explode already rising costs. A broken tax code means unchecked wealth hoarding. The numbers are staggering: 1 trillion dollars of wealth was created for the 19 richest US households just last year. To put that number into perspective, that is more than the output of the entire Swiss economy. That was the largest one-year increase in wealth ever recorded. I have studied this rapidly ballooning wealth concentration and, like my colleagues who focus on democracy and governance, I am alarmed by the increasingly aggressive power wielded by a small number of ultra-wealthy individuals. The good news is hope is not lost. We can break up this dangerous concentration of wealth by taxing billionaires. There is growing public support for doing just this, even among Republican voters. A recent Morning Consult poll found that 70% of Republicans believed the wealthiest Americans should pay higher taxes, up from 62% six years ago. With many of the Trump 2017 tax cuts for the wealthy set to expire this year, legislators have an opportunity to reset the balance, driving dangerous wealth hoarding. Rather than considering raising taxes on middle-class Americans or even households earning above \$400,000, they must focus on the immense concentration of wealth among the very top 0.1% of Americans. This would not only break up concentrated wealth but also generate substantial revenue.