

# CAROLINE CECOT

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## ACADEMIC APPOINTMENTS

### GEORGE WASHINGTON UNIVERSITY LAW SCHOOL

*Visiting Associate Professor of Law*, 2024 – present

*Courses*: Environmental Law, Torts, Environmental Law and Economics Seminar

### ANTONIN SCALIA LAW SCHOOL AT GEORGE MASON UNIVERSITY

*Professor of Law*, 2024 – present

*Associate Professor of Law*, 2023 – 2024

*Assistant Professor of Law*, 2017 – 2023

*Courses*: Administrative Law, Energy Law, Environmental Law, Torts

*Honors*: Faculty Graduation Speaker (2021 & 2024) (elected by students)

*Faculty Advisor*: GEORGE MASON LAW REVIEW (2021 – present), Society for Environmental and Energy Law (2018 – present), OutLaw (2020 – present), THE DOCKET newsletter (2021 – present), American Constitution Society (2021 – present); If/When/How (2022 – present)

*Faculty Committees*: Faculty Selection Committee (2017 – 2019; 2022 – 2024), Curriculum Committee (2017 – 2023), Admissions Committee (2018 – 2019; 2021 – 2022 (co-chair); 2023 – 2024), Academic Standing and Student Affairs Committee (2019 – 2021), Diversity, Equity & Inclusion Task Force (2020 – 2021)

### DUKE UNIVERSITY SCHOOL OF LAW

*Visiting Professor of Law*, April 2022

### VANDERBILT LAW SCHOOL

*Postdoctoral Research Scholar in Law and Economics*, 2014 – 2015

Certificate in College Teaching

*Course*: Risk and Environmental Regulation II

## PUBLICATIONS

### BOOKS

ENVIRONMENTAL LAW AND POLICY (with Richard L. Revesz, Michael A. Livermore, and Jayni Foley Hein) (Foundation Press, 4th Ed. 2019; 5th Ed. 2024) ([Link](#)).

## ARTICLES AND ESSAYS

*The Meaning of “Silence,”* 31 GEORGE MASON LAW REVIEW 515 (2024) (invited contribution) ([GMLR](#)).

*Incorporating Equity and Justice Concerns in Regulation,* 18 REGULATION & GOVERNANCE 99 (2024) (with Robert W. Hahn) ([RegGov](#); [SSRN](#)).

*Efficiency and Equity in Regulation,* 76 VANDERBILT LAW REVIEW 361 (2023) ([VLR](#); [SSRN](#)).

Recipient of [Honorable Mention](#) for Best Environmental Law and Policy Article, selected by the ENVIRONMENTAL LAW AND POLICY ANNUAL REVIEW in collaboration with the Environmental Law Institute; brief summary published in ENVIRONMENTAL LAW REPORTER 2023-2024 issue; recipient of the Top 20 Award.

*An Equity Blindspot: The Incidence of Regulatory Costs,* 14 JOURNAL OF BENEFIT-COST ANALYSIS 35 (2023) ([JBCA](#)).

*The Hierarchy and Performance of State Recycling and Deposit Laws,* 23 VERMONT JOURNAL OF ENVIRONMENTAL LAW 319 (2022) (with W. Kip Viscusi) ([VJEL](#)) (invited contribution).

*Congress and Cost-Benefit Analysis,* 73 ADMINISTRATIVE LAW REVIEW 787 (2021) ([ALR](#); [HeinOnline](#); [SSRN](#)).

*The Federal Enforcement Threat: The Effect of Overfiling Under the Resource Conservation and Recovery Act,* 18 JOURNAL OF EMPIRICAL LEGAL STUDIES 534 (2021) ([JELS](#)).

*Transparency in Agency Cost-Benefit Analysis,* 72 ADMINISTRATIVE LAW REVIEW 157 (2020) (with Robert W. Hahn) ([ALR](#); [HeinOnline](#); [SSRN](#)).

*The Data Gap: Promoting Analysis of Exposure-Related Harms,* 69 DEPAUL LAW REVIEW 297 (2020) ([DePaul](#); [HeinOnline](#); [SSRN](#)) (invited contribution).

*Deregulatory Cost-Benefit Analysis and Regulatory Stability,* 68 DUKE LAW JOURNAL 1593 (2019) ([DLJ](#); [HeinOnline](#); [SSRN](#)).

Recipient of the Top 20 Award, selected by the ENVIRONMENTAL LAW AND POLICY ANNUAL REVIEW in collaboration with the Environmental Law Institute, designating it as one of the top twenty environmental law and policy articles.

Excerpted in ALFRED C. AMAN, JR., WILLIAM PENNIMAN, & LANDYN ROOKARD, ADMINISTRATIVE LAW: PROCESS AND PROBLEMS, 4th Ed. (Carolina Academic Press, 2020).

*Filling the Federal Enforcement Gap,* 33 NATURAL RESOURCES & ENVIRONMENT 36 (2019) ([HeinOnline](#)).

*Economics and Environmental Law Scholarship*, in PERSPECTIVES ON ENVIRONMENTAL LAW SCHOLARSHIP: ESSAYS ON PURPOSE, SHAPE, AND DIRECTION (Ole W. Pedersen ed.) (Cambridge University Press, 2018) (with Michael A. Livermore) ([Link](#)).

*No Fracking Way: An Empirical Look at Why New York Towns Banned Shale Development*, 48 ENVIRONMENTAL LAW 761 (2018) ([EL](#); [HeinOnline](#); [SSRN](#)).

*Regulatory Fracture Plugging: Managing Risks to Water from Shale Development*, 6 TEXAS A&M LAW REVIEW 29 (2018) ([TAMLR](#); [HeinOnline](#); [SSRN](#)) (invited contribution).

*The One-In, Two-Out Executive Order Is a Zero*, 165 UNIVERSITY OF PENNSYLVANIA LAW REVIEW ONLINE (2017) (with Michael A. Livermore) ([HeinOnline](#)).

*Mineral Royalties: Historical Uses and Justifications*, 28 DUKE ENVIRONMENTAL LAW & POLICY FORUM 1 (2017) (with Jayni Foley Hein) ([HeinOnline](#); [SSRN](#)).

*Fractured Systems: A Multiple Policy Proposal for Promoting Safe Shale Gas Delivery in the United States*, in DELIVERING ENERGY LAW AND POLICY IN THE EU AND THE US: A READER (Raphael J. Heffron and Gavin Little eds.) (Edinburgh University Press, 2016).

*Judicial Review of Agency Benefit-Cost Analysis*, 22 GEORGE MASON LAW REVIEW 575 (2015) (with W. Kip Viscusi) ([HeinOnline](#); [SSRN](#)) (invited contribution).

*Discontinuous Behavioral Responses to Recycling Laws and Plastic Water Bottle Deposits*, 15 AMERICAN LAW & ECONOMICS REVIEW 110 (2013) (with W. Kip Viscusi, Joel Huber, and Jason Bell).

*Note, Blowing Hot Air: An Analysis of State Involvement in Greenhouse Gas Litigation*, 65 VANDERBILT LAW REVIEW 189 (2012).

*South Asian Telecommunications Development and the Role of Regional Cooperation*, in THE SERVICE REVOLUTION IN SOUTH ASIA (Ejaz Ghani ed.) (Oxford University Press, 2010) (with Scott Wallsten).

*The Benefits and Costs of Ethanol: An Evaluation of the Government's Analysis*, 35 JOURNAL OF REGULATORY ECONOMICS 275 (2009) (with Robert W. Hahn).

*An Evaluation of the Quality of Impact Assessment in the European Union with Lessons for the US and the EU*, 2 REGULATION & GOVERNANCE 405 (2008) (with Robert W. Hahn, Andrea Renda, and Lorna Schrefler).

*The Economic Significance of 'Insignificant' Rules*, 1 REGULATION & GOVERNANCE 172 (2007) (with Robert W. Hahn).

## SHORTER WORKS

*Stimulating Distributional Analysis*, 48 ADMINISTRATIVE & REGULATORY LAW NEWS 8 (2023), cross-posted on [YALE JOURNAL ON REGULATION NOTICE & COMMENT](#) (2023).

[US benefit-cost analysis requires revision](#), 380 SCIENCE 803 (2023) (with Peter H. Howard, Max Sarinsky, Michael Bauer, Maureen Cropper, Moritz Drupp, Mark Freeman, Kenneth T. Gillingham, Christian Gollier, Ben Groom, Qingran Li, Michael Livermore, Richard Newell, William A. Pizer, Brian Prest, Glenn Rudebusch, Thomas Sterner, and Gernot Wagner).

[Ensuring Efficiency, Expediency, Equity](#), 40 THE ENVIRONMENTAL FORUM (May/June 2023).

[Major Questions about West Virginia v. EPA and Benefit-Cost Analysis](#), ON BALANCE (2022).

[Add Progress, Stability to Policymaking](#), 39 THE ENVIRONMENTAL FORUM (March/April 2022).

[Who Benefits from Cost-Benefit Analysis?](#), YALE JOURNAL ON REGULATION NOTICE & COMMENT (2021).

[Benefit-Cost Lessons Learned](#), ON BALANCE (2021) (with Bethany Davis Noll and Richard Revesz).

## PODCASTS ON RESEARCH

[Congressional Silence, Agency Power, and the Chevron Doctrine with Caroline Cecot](#), TWO THINK MINIMUM, hosted by Sarah Oh Lam, Thomas M. Lenard, and Scott Wallsten (Apr. 30, 2024).

[Cost-Benefit Analysis and Regulatory Stability](#), with Caroline Cecot and Michael A. Livermore, THE MARKETPLACE OF IDEAS, hosted by Donald Kochan (Jan. 13, 2021).

[Congress and Cost-Benefit Analysis](#), with Caroline Cecot and Ricky Revesz, GRAY MATTERS, hosted by Adam J. White (Oct. 23, 2020).

[Caroline Cecot on Cost-Benefit Analysis](#), IPSE DIXIT, hosted by Brian L. Frye (Apr. 22, 2020).

[Regulating the Risks of Fracking to Water](#), with Caroline Cecot, ENERGYTRADEOFFS.COM, hosted by James Coleman (Oct. 14, 2019).

## WORKING PAPERS

“How Well Do Governments Assess the Distributional Impacts of Policy?” (with Robert W. Hahn and Eslem Imamoglu)

“Inefficiency Defaults”

“Property Values and Risks: Evidence from Shale Development” ([SSRN](#))

## EDUCATION

### VANDERBILT UNIVERSITY

Ph.D., Law and Economics, 2014

*Fields:* Risk and Environmental Regulation, Labor and Human Resources

*Dissertation:* “Shale Development: Risks, Responses, and Regulation”

Committee: W. Kip Viscusi (Chair), Joni Hersch, Dana Nelson, J.B. Ruhl

*Awards:* Southern Economic Association Graduate Student Award

### VANDERBILT LAW SCHOOL

J.D., 2014

*Honors and Awards:* Order of the Coif; Robert F. Jackson Memorial Prize (highest GPA after 2L year); Archie B. Martin Memorial Prize (highest GPA after 1L year); Dean’s Research Fellowship in Law and Economics; Scholastic Excellence Awards in Constitutional Law, Criminal Law, Regulatory State, and Public Choice and the Law

*Activities:* VANDERBILT LAW REVIEW, Senior Articles Editor; ENVIRONMENTAL LAW AND POLICY ANNUAL REVIEW, Articles Editor

### HARVARD UNIVERSITY

A.B., Economics, *magna cum laude*, 2006

Phi Beta Kappa

## JUDICIAL CLERKSHIP

### U.S. COURT OF APPEALS FOR THE SECOND CIRCUIT

*Law Clerk for the Honorable Raymond J. Lohier, Jr.*, 2015 – 2016

## PROFESSIONAL ACTIVITIES AND EXPERIENCE

### HOOVER INSTITUTION, STANFORD UNIVERSITY

*Campbell Visiting Fellowship*, Spring 2023

### PROPERTY AND ENVIRONMENT RESEARCH CENTER

*Lone Mountain Fellow*, August 2021

### U.S. ENVIRONMENTAL PROTECTION AGENCY, SCIENCE ADVISORY BOARD

*Member of the Economic Guidelines Review Panel*, 2020 – 2021

Charge and final report [here](#).

INSTITUTE FOR POLICY INTEGRITY, NEW YORK UNIVERSITY SCHOOL OF  
LAW

*Legal Fellow*, 2016 – 2017

U.S. COURT OF APPEALS FOR THE SECOND CIRCUIT

*Law Clerk for the Honorable Raymond J. Lohier, Jr.*, 2015 – 2016

U.S. DISTRICT COURT FOR THE MIDDLE DISTRICT OF TENNESSEE

*Legal Intern for the Honorable Joe B. Brown, Magistrate Judge*, 2014  
– 2015

VANDERBILT LAW SCHOOL

*Postdoctoral Research Scholar in Law and Economics*, 2014 – 2015

*Research Assistant*, 2008 – 2014

W. Kip Viscusi (2009 – 2014), Lisa Schultz Bressman (2010), Terry A. Maroney (2010),  
Michael P. Vandenbergh (2008)

AEI CENTER FOR REGULATORY AND MARKET STUDIES

*Research Associate*, 2008

AEI-BROOKINGS JOINT CENTER FOR REGULATORY STUDIES

*Research Assistant*, 2006 – 2008

## RECENT PRESENTATIONS

### 2024

- Society for Benefit-Cost Analysis Annual Meeting
- Stanford University, Hoover Institution
- Southern Economic Association Annual Meeting (forthcoming)

### 2023

- Stanford University, Hoover Institution, Campbell Visiting Fellows Workshop
- Society for Benefit-Cost Analysis Annual Meeting
- FINRA Office of Regulatory Economics and Market Analysis Seminar
- Frontiers of Law and Economics, Vanderbilt Law School
- Revising Regulatory Review: Expert Insights on the Biden Administration's Guidelines for Regulatory Analysis, George Washington University
- Virginia's New Approach to Regulatory Modernization, Regulatory Transparency Project
- U.S. Department of Agriculture Office of Risk Assessment and Cost Benefit Analysis Forum Series on Science, Policy and Risk
- Permitting the Future, Case Western Reserve University
- *Chevron on Trial*, C. Boyden Gray Center, Antonin Scalia Law School, George Mason University

- Southern Economic Association Annual Meeting

## **2022**

- Berkeley Law and Economics Workshop
- Society for Benefit-Cost Analysis Annual Meeting
- Duke University School of Law Faculty Workshop
- Meeting of the Society for Environmental Law and Economics
- American Law and Economics Association Annual Meeting
- Fifth Annual EnviroSchmooze, Texas A&M University School of Law
- Southern Economic Association Annual Meeting

## **2021**

- Cost-Benefit Analysis and the Environment, Environmental Law Institute
- Society for Benefit-Cost Analysis Annual Meeting
- Frontiers of Law and Economics, Vanderbilt Law School
- Levy Faculty Workshop, Antonin Scalia Law School, George Mason University
- Notre Dame Law School Law and Economics Faculty Workshop
- Summer Seminar Series, Property and Environment Research Center
- Manne Faculty Forum, Antonin Scalia Law School, George Mason University
- Vermont Journal of Environmental Law's Symposium
- Southern Economic Association Annual Meeting

## **2020**

- Manne Faculty Forum, Antonin Scalia Law School, George Mason University
- American Law and Economics Association Annual Meeting
- Cardozo School of Law Faculty Workshop
- University of Virginia Law and Economics Workshop
- Florida-Michigan-Virginia Virtual Law and Economics Series
- Southern Economic Association Annual Meeting
- *Cancelled due to pandemic:* Society for Benefit-Cost Analysis Annual Meeting
- *Cancelled due to pandemic:* Meeting of the Society for Environmental Law and Economics

## **2019**

- Clifford Symposium on Tort Law and Social Policy, Rising Stars, DePaul University College of Law
- Frontiers of Law and Economics, Vanderbilt Law School
- Deregulatory Games, Duke University School of Law
- Association of American Law Schools Annual Meeting
- Manne Faculty Forum, Antonin Scalia Law School, George Mason University
- C. Boyden Gray Center for the Study of the Administrative State, Antonin Scalia Law School, George Mason University
- Southern Economic Association Annual Meeting

## 2018

- Works-In-Progress Symposium on Climate Change, Energy, and Natural Resources Law, UCSB Bren School of Environment
- Southeastern Association of Law Schools Annual Meeting
- Society for Benefit-Cost Analysis Annual Meeting
- Environmental Protection: Carrots or Sticks, Texas A&M School of Law and the New York University School of Law Classical Liberal Institute
- Georgetown University Law Center Law and Economics Workshop
- Manne Faculty Forum, Antonin Scalia Law School, George Mason University
- Southern Economic Association Annual Meeting

## SELECTED NEWS INTERVIEWS, LITIGATION, AND PUBLIC COMMENTS

Interviewed on the Supreme Court's *Loper Bright* decision in Simone Del Rosario, *Supreme Court strips federal agencies of widely used power, kicks it to courts*, SAN (June 28, 2024), <https://san.com/cc/supreme-court-strips-federal-agencies-of-widely-used-power-kicks-it-to-courts/>.

Comments of legal scholars supporting FERC's authority to consider climate impacts in certification proceedings under Section 7 of the Natural Gas Act (Apr. 25, 2022).

Comments of the Institute for Policy Integrity at New York University School of Law concerning the Environmental Protection Agency's obligation to evaluate existing regulations and identify some for repeal, replacement, or modification under Executive Order 13,777 (May 15, 2017).

Comments of the Institute for Policy Integrity at New York University School of Law concerning the Environmental Protection Agency's proposed process for risk evaluation under the Amended Toxic Substances Control Act (Mar. 20, 2017).

Comments of the Institute for Policy Integrity at New York University School of Law concerning the California Air Resources Board's Midterm Review of the Advanced Clean Cars Program (Mar. 20, 2017).

Comments of the Institute for Policy Integrity at New York University School of Law concerning Interim Guidance from the Office of Information and Regulatory Affairs implementing Executive Order 13,771 (Feb. 10, 2017).

Brief of *Amicus Curiae* Institute for Policy Integrity at New York University School of Law in *Murray Energy Corporation, et al. v. U.S. Environmental Protection Agency* (D.C. Cir. 2017) (supporting finding that it is appropriate and necessary to regulate hazardous air pollutant emissions from power plants).

Brief of *Amicus Curiae* Institute for Policy Integrity at New York University School of Law in *State of North Dakota, et al. v. U.S. Environmental Protection Agency* (D.C. Cir. 2016) (supporting rule imposing limitations on greenhouse gas emissions from new power plants).



## TEACHING

### ANTONIN SCALIA LAW SCHOOL AT GEORGE MASON UNIVERSITY

Administrative Law: Spring 2018, Spring 2019, Fall 2019, Spring 2021, Spring 2023

Energy Law: Spring 2023, Spring 2024

Environmental Law: Fall 2017, Spring 2018, Spring 2021, Spring 2024

Torts: Fall 2018, Fall 2019, Fall 2020, Fall 2021, Fall 2022, Fall 2023

*Pre-2020 Student Ratings of Instruction available at <https://crserating.gmu.edu>*

*Post-2020 Student Ratings of Instruction available at <https://gmubluera.com/gmu/>*

### VANDERBILT LAW SCHOOL

Risk and Environmental Regulation II: Spring 2015

## PROFESSIONAL SERVICE

### Leadership

Vice President (elected), Society for Benefit-Cost Analysis, 2024

Board Member (elected), Society for Benefit-Cost Analysis, 3-year term, 2023

### Editorial Service

Associate Editor, *Journal of Benefit-Cost Analysis*, 2-year term, 2023 – 2024

### Peer Review Service

*Yale Law Journal; Northwestern University Law Review; Regulation & Governance; International Review of Law & Economics; Journal of Benefit-Cost Analysis; Journal of Regulatory Economics; International Journal of the Commons; Natural Hazards Review*

### Ph.D. Dissertation Committees

Elissa Cohen, American University, Economics (external reader)

S. Bennett Drane, George Mason University, Environmental Science and Policy (committee member)

### Scholarly Affiliations

Hoover Institution at Stanford University, *Campbell Visiting Fellowship*, 2023

Atlantic Council, *Non-Resident Senior Fellow*, 2020 – present

C. Boyden Gray Center for the Study of the Administrative State, *Affiliated Faculty*, 2019 – present

Technology Policy Institute, *University Fellow*, 2019 – present

Institute for Policy Integrity at NYU School of Law, *Affiliated Scholar*, 2017 – present

### Other Professional Contributions

Society for Benefit-Cost Analysis

*Nominations Committee*, appointed to 3-year term, 2022 – 2024

*Program Committee for Annual Meeting*, 2022, 2023

European Association of Law and Economics Annual Conference

*Area Organizer*, Torts, Environmental Law, Health, Insurance, 2024

American Law and Economics Association

*Area Organizer*, Property, Environmental, and Administrative Law, 2023

Conference on Empirical Legal Studies

*Co-Reviewer*, Environmental Law Section, 2022

Southern Economics Association

*Presidential Session Organizer*, 2018 – 2021

## **BAR ADMISSION**

New York (2015)