

# Teaming Up Across Political Divides: Evidence from Climate Regulations<sup>\*</sup>

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Why do interest groups with contrasting interests and policy goals work together? I present a theory of collaborative policy production and show that interest groups can achieve higher policy gains through collaboration, even though their ideal policy goals may diverge significantly. To test theoretical results, I introduce original measurement strategies that reveal systematic patterns in which firms and environmental groups invest in joint efforts to improve fine-grained details of policy to achieve greenhouse gas emissions targets. The analysis, using public comments spanning 2010-2020, demonstrates that comments written jointly by environmental groups and firms contain more information that can contribute to the quality of policy implementation than individual efforts alone, despite compromises on policy preferences. These findings highlight the hidden dynamics of regulatory politics, wherein divergent political goals are reconciled for high-quality policy implementation.

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# 1. Introduction

Why do interest groups collaborate despite having competing interests and policy goals? The question of how interest groups influence a policy is a long-standing central topic in political economy. During the prior several decades, much progress has been made in understanding the process of developing policy when political actors with vested interests compete in varying institutional contexts (e.g., [Hirsch and Shotts 2015, 2012](#); [Baron and Ferejohn 1989](#); [Krehbiel 2010](#); [Crawford and Sobel 1982](#); [Gilligan and Krehbiel 1989](#)). One prominent argument is that groups use *policy-specific* expertise to effectively achieve a particular political goal. However, there are no clear explanations as to why and how interest groups compromise their contrasting policy preferences "within a team," despite abundant empirical evidence pointing to the formation of "interest-diverse" coalitions (e.g., [Nelson and Yackee 2012](#); [Baumgartner et al. 2009](#); [Dwidar 2022a](#); [Heaney and Leifeld 2018](#); [Lorenz 2020](#); [Phinney 2017](#)).

This paper is motivated by several consistent empirical patterns in climate politics that classical accounts in the policymaking literature do not explain. For example, although the U.S. Chamber of Commerce opposed passing cap-and-trade legislation during the 111th Congress, several Chamber members joined the U.S. Climate Action Partnership (USCAP), a coalition of industry and environmental stakeholders that attempted to hammer out a workable compromise that could attract the necessary votes to become law ([Livermore and Revesz 2015](#)).<sup>1</sup> The Environmental Defense Fund (EDF), one of the mainstream nonprofit environmental advocacy groups, explicitly mentions on its website that it saw the need to partner with mainstream businesses since the 1980s. The group is actively partnering with

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<sup>1</sup>See U.S. Climate Action Partnership, About U.S., <http://www.us-cap.org/about-us/> (declaring USCAP's "pledge to work with the President, the Congress, and all other stakeholders to enact an environmentally effective, economically sustainable, and fair climate change program"); see also Eric Pooley, *The Climate War: The Believers, Power Brokers, and the Fight to Save the Earth* (2010), 34. (quoting Duke Energy executive Jim Rogers, a member of USCAP, responding to criticism of the participation by coal mining executive Robert Murray of Murray Energy: "Legislation is coming. We can help shape it, or we can sit on the sidelines and let others do it.")

Walmart and FedEx.<sup>2</sup> Another example is the American Council for an Energy-Efficient Economy (ACEEE), one of the nonprofit coalitions supporting climate action. More explicitly, its Ally Program includes utilities, manufacturers, and other energy industries as partners, such as the American Chemical Council, and Xcel Energy, as well as a group of environmental and consumer leaders.<sup>3</sup>

These partnerships are puzzling given the contrasting policy preferences of firms and environmental groups. A closer analysis of business strategies in climate change reveals that restrictions on firms' polluting behaviors pose a significant challenge to particular industries. Although some firms (e.g., Shell, BP) have begun to diversify into other energy sources that produce less greenhouse gas emissions, none of these alternative energy sources can provide business opportunities on the same scale as those provided by oil and coal production (Stokes 2020). Contrary to industries' fear of adverse consequences from regulations, previous studies indicate that stringent regulations would primarily benefit environmental groups (Cheon and Urpelainen 2013; Bernauer and Caduff 2004; Aidt 1998). However, despite the divergent effects of regulations leading to different policy preferences, firms and environmental groups collaborate closely.

I argue that concerns over the quality of policy implementation is the reason behind collaborative efforts between interest groups who have contrasting policy preferences. In regulatory politics, the pursuit of *policy preference* is accompanied by concerns for *quality* of policy. By *quality*, I mean fine-grained and technical details of the policy that help achieve the targeted policy goals realistically. In climate policymaking, despite differing preferences for target emission reductions, interest groups share a common interest in developing feasible and sustainable solutions to achieve the given emission standards. For example, they are interested in considering the unexpected consequences of proposed

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<sup>2</sup>See the website of Environmental Defense Fund, <https://www.edf.org/partnerships/business-and-industry>. EDF has collaborated with over 30% of Fortune 100 companies.

<sup>3</sup>See the website of ACEEE for further details. <https://www.aceee.org/aceee-ally-program>. Allies receive benefits from ACEEE, including public recognition via ACEEE's website, early access to ACEEE research reports, and access to a network of energy efficiency experts, leaders, and decision-makers.

emission control technologies, the economic costs involved, and how environmental groups' technical knowledge of climate mitigation can be used in industrial operations to develop sustainable and long-term practices. Here, the instrumental motive of policy outcomes themselves becomes less significant (Hirsch 2022; McCarty 2020), as long as groups are able to contribute to refining the details of the emission reduction targets. Although the divergent policy goals are reconciled, interest groups prefer a compromise with a high-quality of policy implementation instead of their own preferred policies with a low-quality implementation. And these dynamics can be observed empirically during the notice and comment period in the United States, which is the focus of this article. This process involves an agency attempting to "develop" rules after Congress sets the policy goal.<sup>4</sup>

To analyze why political actors work together despite unaligned preferences, I draw upon the theoretical framework of McCarty (2020) and Alchian and Demsetz (1972) to incorporate rulemaking dynamics for which regulatory officials need quality information to make reasonably good policy decisions. Bureaucrats create most regulations (Warren 2018; Shipan 2004), a process that is particularly true for environmental policymaking by which relatively few environmental laws have been passed (e.g., Rothenberg 2018; Lazarus 2014). On the basis of theoretical results, I provide descriptive evidence that firms and environmental groups, which have competing interests, invest in joint efforts to provide informative texts (defined as abundant analytical evidence and scientific reasoning) so that regulators can make fine-grained and technical judgments (Breyer 1982; Hawkins and Thomas 1989). This empirical pattern is consistent with the qualitative testimony provided by a former chief scientist at the EDF.

My theory also provides micro-foundations for the argument that interest group competition in regulatory policymaking is centered on the provision of expertise (Epstein et al. 2014; Carpenter and Moss 2014; Huber and Shipan 2002; Weingast 1984; Schnaken-

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<sup>4</sup>"Learn About the Regulatory Process," Regulation.gov, April 24, 2024., <https://www.regulations.gov/learn>.

berg 2017). Existing empirical research on interest group politics is focused on financial resources, such as PAC contributions or lobbying expenditures, as a measure of political power. However, the primary resource of power in the regulatory context is information.<sup>5</sup> To provide evidence consistent with theoretical predictions, I describe systematic measurements of information, placing particular emphasis on expertise. This approach contrasts with existing literature on rulemaking, which has been focused primarily on analyzing the frequency of submissions or the types of political actors involved in the notice-and-comment period. I accomplish measurements of information by analyzing 15,883 publicly submitted comments on greenhouse gas emissions standards between 2010 and 2020.

I then provide empirical evidence consistent with the theoretical prediction that interest groups collaborate to improve the quality of a policy, despite compromises in their policy preferences. To quantify compromise, I leverage qualitative evidence indicating that business interests attempt to reframe the climate conversation by focusing on R&D and technological issues, whereas environmental groups emphasize reduction (e.g., Supran and Oreskes 2021; Downie 2017; Grumbach 2015; Schlichting 2013). I incorporate text embedding methods with a *Paragraph Vector* framework to construct the issue dimension, with each end indicating the topic favored by each interest group. My analysis shows that comments from environmental groups with business partners tend to be located in the middle of this issue dimension, indicating a compromise between the two factions. For example, comments from environmental groups with business partners are relatively skewed toward business-friendly topics compared with comments from environmental groups without business partnerships. However, because they represent a compromised outcome, the extent of the issue slant in comments from partnerships is comparatively less pronounced than the slant in comments from business interests alone.

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<sup>5</sup>The role of information in the regulatory process has been discussed widely. Magat et al. (2013) elaborates that higher quality information supporting a proposed regulation reduces opponents' ability to modify the regulations. Moreover, the timing of when information is received can influence the rulemaking decisions (Ingram and Ullery 1977).

In trade-offs for policy preferences, both interest groups achieve policy gains from strategic partnerships. To empirically demonstrate this outcome, I use named entity recognition techniques to measure the quantity of expertise. Public comments written by strategic partnerships of firms and environmental groups contain more specific evidence and analytical reasoning compared with comments composed individually by each group, which is consistent with my theoretical predictions. Specifically, a collaboration with business partners substantially augmented the volume of information present in the comments associated with environmental groups, even after controlling for different group characteristics. Lastly, I employ information theory to quantify the political influence of strategic partnerships on finalized policy outcomes. I find that comments produced by collaboration between firms and environmental groups show a closer statistical distance to the finalized policy relative to comments composed by single entities. As a robustness check, I examine the citation patterns among Environmental Protection Agency (EPA) officials. The results reveal that EPA officials tend to cite comments written by strategic partnerships more frequently than they cite other types of comments. These findings provide further support for my argument on why political actors with conflicting interests engage in collaboration, and how the enhanced quality of information that results from strategic partnerships is translated into political influence.

This article makes both theoretical and empirical contributions to the study of coalition lobbying in policymaking (e.g., [Bertrand et al. 2020](#); [Dwidar 2022a](#); [Heaney and Lorenz 2013](#); [Hula 1999](#)). My argument differs from a signaling model that suggests that regulators tend to seek broad indications of support and that identifies the conditions under which interest groups benefit from signaling the diversity of their coalition to policymakers ([Junk 2019](#); [Mahoney 2007](#); [Nelson and Yackee 2012](#); [Phinney 2017](#)). Although it is well-known that bureaucrats have diverse considerations, including their political or career interests, the formation of a coalition among interest groups in regulatory policymaking is not explained solely by the need to signal diversity of membership. During the stage

whereby technical judgment is required for designing the major operations to achieve the given policy goals, regulators have a significant incentive to invest in expertise and obtain technical information to refine the fine-grained details (Stephenson 2007; Gailmard and Patty 2012; Carpenter and Ting 2007; Huber 2007; McCarty 2017). In this regard, I offer a new perspective that cooperative policy production among interest groups can help regulators refine the details of a policy once a target policy objective is defined. By examining the coalition of polluting firms and environmental groups and its impact on climate regulations, I also contribute to the empirical literature on the influence of interest groups on climate politics (e.g., Cory et al. 2021; Colgan et al. 2021; Culhane et al. 2021; Brulle and Downie 2022; Lerner and Osgood 2022; Sautner et al. 2020; Urpelainen and Van de Graaf 2018).

## **2. Interest Groups Working Together in Regulatory Politics**

Scholars have emphasized the influence that interest groups have over regulatory policy-making. Regulators have significant discretion in formulating regulations (McCarty 2017), and interest groups engage in various activities to influence regulators' policy choices that are in their favor. Such activities include direct lobbying of bureaucrats (You 2017), participation in federal advisory committees (Balla and Wright 2001; Moffitt 2014), lobbying of legislators who oversee bureaucrats (Hall and Miler 2008; Epstein and O'halloran 1995; McCubbins and Schwartz 1984), and involvement in the notice and comment process (Gordon and Rashin 2021; Carpenter et al. 2020; Libgober et al. 2020; Haeder and Yackee 2015; McKay and Yackee 2007; Furlong and Kerwin 2005).

Interest groups frequently engage in these political activities via formal partnerships or ad-hoc coalitions (Nelson and Yackee 2012; Baumgartner et al. 2009; Hula 1999; Heinz et al. 1993). They invest as teams in any coordinated efforts, with the objective of advancing their interests. To explain why lobbying together is a more advantageous strategy compared to lobbying alone, scholars have analyzed the size of coalitions (Nelson and Yackee 2012)



or the types of their interests (e.g., broad versus narrow) represented in the coalition (Mahoney 2007). A growing body of work relates lobbying success to the effect of the composition of coalition such as organization types (e.g., trade association and sectoral firms), partisan identities, or interest diversity (e.g., organizations representing diverse industries) (Dwidar 2022a; Heaney and Leifeld 2018; Lorenz 2020; Phinney 2017). However, the dynamics of how competing interests compromise a policy "within a team" and what incentivizes them to work together despite such compromises are rarely addressed. To bridge the gap, I propose a theoretical prediction wherein compromises between political actors emerge endogenously due to interest groups' concern for high-quality policy.

### **3. Theory: Investing in Team Efforts for Improving the Quality of Policy**

Regulators use notice-and-comment periods to "develop" rules (Potter 2019; Balla 1998; Libgober 2020; Baumgartner et al. 2009; Yackee and Yackee 2006; Baumgartner and Jones 2010) after the policy goal is outlined by Congress.<sup>6</sup> Thus, the stage requires fine-grained, technical judgment concerning how major operations should be designed. Therefore, information, namely expertise, plays a vital role in regulatory politics (Libgober et al. 2020; Breyer 1982; Hawkins and Thomas 1989), and interest groups with specialized knowledge of the complex policy arena have an advantage in this competition (Epstein et al. 2014). Given the nature of regulatory policymaking, I present a theoretic model to generate predictions concerning the demand for high-quality policy by a coalition of groups whose preferences may diverge significantly.<sup>7</sup>

I analyze the behavior of interest groups under the following scenario. Let there be

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<sup>6</sup>Under the Administrative Procedure Act (APA) of 1946, agencies typically must provide the notice and comment period in which a proposed policy is open for public review. During this stage, all interested parties are invited to provide written comments regarding the content of the proposed rule posted by agencies.

<sup>7</sup>The closest model is McCarty (2020), which examines how policy outcomes under the separation of powers are influenced by the interplay between legislative design and executive branch implementation. Although the contexts differ, the fundamental idea of policymaking as a team effort among relevant agents remains consistent.



two interest groups  $i=1,2$  and a regulator. Group 1 holds an ideal policy position of 0, and Group 2's ideal policy position is represented by  $\phi$ , where  $0 < \phi \leq 1$ . Both groups possess preferences for the policy outcome, denoted as  $p$ , and the quality of the policy  $\chi$ . For simplicity, we assume that the cost associated with developing a compromised policy is zero and a regulator is concerned only about the quality  $\chi$ . This setting reflects the context of agency policymaking when the target policy is already determined by Congress, and the agency is responsible for developing the details of the mandate. The utility function of interest groups follows the following setup proposed by [McCarty \(2020\)](#):

$$U_i(\chi, d(i, p)) = \chi(1 - d(Ideal_i, p)) - c(e_i) \quad (1)$$

, where *Ideal* is an ideal policy of groups, 0 or  $\phi$ .  $d(\cdot)$  is the Euclidean distance  $(Ideal_i - p)^2$ , and  $U$  is an increasing function of policy quality  $\chi$  and a decreasing function of  $d(\cdot)$ . In contrast to the common assumption made in models of policymaking that the level of quality is determined by the efforts of a single agent, quality here is defined as an increasing function of the groups' joint efforts,  $\chi = f(\alpha_1 e_1, \alpha_2 e_2)$  where  $e_i$  indicates the effort, and  $\alpha_i$  indicates the impact of efforts of group  $i$ .

The game progresses through two stages. In the first stage, groups engage in bargaining over the policy outcome  $p$ . If bargaining is successful, both groups make simultaneous decisions about the amount of effort to invest in relation to the negotiated policy outcome  $p$ , and then submit a joint proposal. However, if bargaining fails, each group independently and simultaneously decides on their own  $p$  and individual effort levels. Next, if the interest groups submit a joint proposal, the regulator accepts it as long as its quality is higher than the regulator's reservation value. However, if groups submit separate proposals, the regulator evaluates the quality and accepts the proposal with the higher value.

To capture the notion that the impact of interest groups' efforts are asymmetric, I assume that  $\alpha_2 > \alpha_1$ . This setup reflects the reality through which interest groups with

varying expertise and resources might affect regulators differently (Berry and Wilcox 2015; Yackee and Yackee 2006). I also define  $R \equiv \frac{\alpha_2}{\alpha_1} > 1$  to represent the relative capacity of the groups.  $c(e_1)$  is defined as  $\frac{1}{2}ke_1^2$  to produce closed form solutions. Because interest groups have various resources and information that will be in joint demand, I consider efforts as perfect complements and the production function is represented as  $\chi = \min\{\alpha_1 e_1, \alpha_2 e_2\}$ . I then characterize the optimal policy and effort in the game.

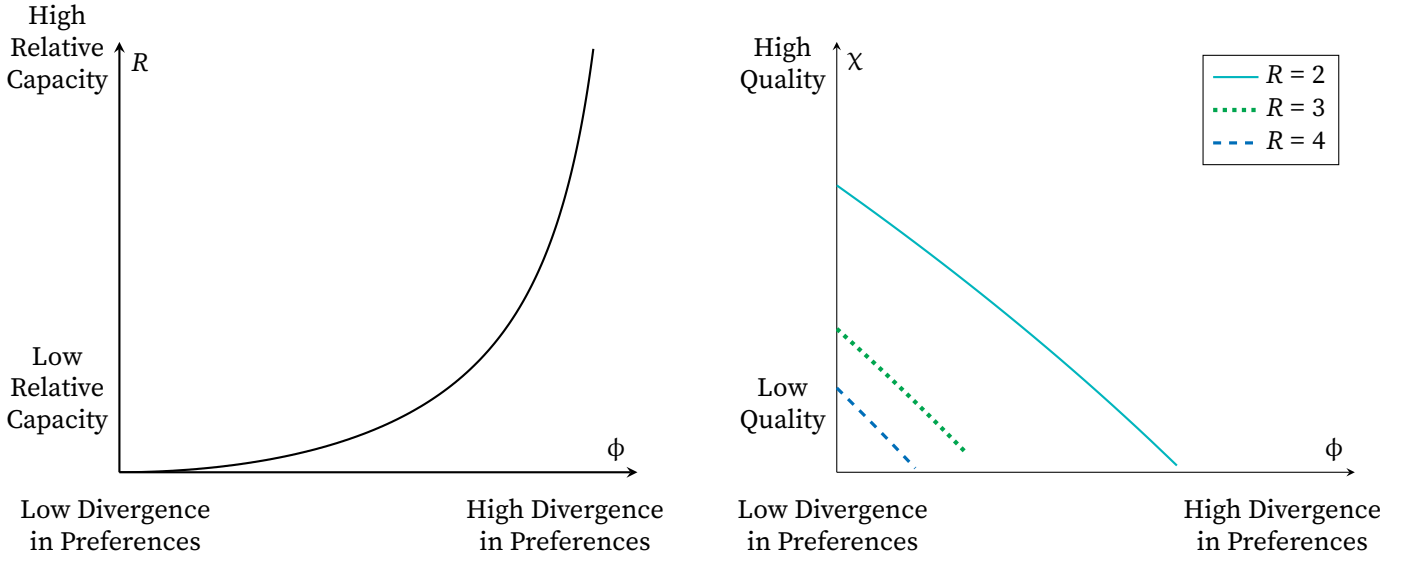


FIGURE 1. Conditions for Interest Groups to Invest in Collaborative Efforts

Note: This figure presents a simulation result regarding the conditions under which interest groups can benefit from collaboration. For simplicity,  $k$  is assumed to be 1, and  $\alpha_1$  is also assumed to be 1. The plot on the right illustrates the quality that can be achieved when interest groups agree to pursue a quality-maximizing policy.

**PROPOSITION 1.** Suppose that  $\chi_1$  is low enough or that  $d(\phi, p)$  is sufficiently high such that player 1 is the low contributor. Groups invest in team efforts if  $\frac{1}{R^2} > (1 - \phi^2)$  and their joint proposal is accepted by a regulator. The optimal policy  $p^c$  is in the interval  $(\hat{p}, \frac{\phi}{2})$ , where  $\hat{p}$  is the quality-maximizing policy,  $\frac{1-\phi^2}{\frac{1}{R^2}+1-2\phi}$ , located between the ideal policy positions of two groups.

The proof and specific functional forms are in the Appendix. Proposition 1 shows several important results. First, the competing political goals of interest groups are reconciled

to the extent that groups maintain incentives to contribute to joint products to improve the quality of policy. The equilibrium efforts of both interest groups are decreasing in  $\phi$ , implying that preferences should not be too extreme to motivate groups to invest in efforts. When  $R$  is high or  $\phi$  is low, meaning Group 2 has relatively high capacity or preferences are less polarized, the optimum policy favors Group 1's ideal policy. However, when Group 1 has higher relative capacity or preferences are more polarized, the quality-maximizing policy leans toward Group 2's ideal policy. In either scenario, interest groups compromise on their ideal policy positions to collaborate.

Second, despite compromise in policy preferences, interest groups produce higher quality that cannot be achieved when working separately. Given that the efforts are perfect complements and quality is defined as a function of the groups' joint efforts, the groups always benefit from cooperative policy production.<sup>8</sup> The condition for  $\hat{p} > 0$  shows that the ideological distance or preference polarization captured by  $\phi$  is instrumental, as long as groups obtain higher policy gains by inducing efforts from their partner. In the complementary efforts setting with  $\alpha_1 < \alpha_2$ , the quality of the policy is determined by Group 1's willingness to exert effort, therefore  $\alpha_2$  has no direct impact on the policy quality, as shown in the plot on the right of Figure 1. But when  $\alpha_2$  is higher, Group 2 wants a greater increase in quality and is willing to make concessions to achieve this, even with a high divergence in preferences, as illustrated in the plot on the left. Although divergence in preferences and relative capacity introduce variation in the degree of policy quality that groups can achieve through joint efforts, collaboration still brings more policy gains compared to working separately.

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<sup>8</sup>By the definition of a perfect complement, the utility of groups if they decide not to work together is 0 due to its negative cross elasticity of demand; if one agent decides not to invest, another agent's efforts will not be demanded. Therefore, none of the agents would invest in efforts when working separately and independently.

### 3.1. Discussion of Theoretic Model

The model of collaborative policy production is distinct from the conventional signaling mechanism. The signaling model suggests that coalitions are successful because the formation of a coalition itself signals credibility or broad support to regulators (Junk 2019; Nelson and Yackee 2012; Lorenz 2020; Phinney 2017; Mahoney 2007), regardless of the quality of policy it contributes to. However, signals derived from ideological positioning or diversity of interests are rarely the sole factor influencing regulators' decisions. Although regulators may have various considerations, such as career incentives or political preferences, they are primarily motivated to acquire the necessary expertise and fulfill their roles as technical experts (e.g., Brierley et al. 2023; Huber 2007; Carpenter and Moss 2014).<sup>9</sup> Therefore, sophisticated public comments that contain a wide range of policy and legal expertise tend to attract more attention from regulators (Dwidar 2022b), because these comments provide opportunities for regulators to obtain subject-area expertise. Although I do not model idiosyncratic concerns, such as a regulator's political bias or responsiveness to the degree of diversity, I emphasize that, in a regulatory context for which fine-grained policymaking demands technical expertise, collaboration among interest groups with diverse interests is not solely determined by reputational concerns or incentives to signal diversity to regulators. The empirical analysis in Section 4.4 offers evidence supporting this claim, while also accounting for the diversity of interests among groups.

This perspective also aligns with the qualitative witness of Michael Oppenheimer, who served for more than two decades as a senior scientist and director of the Climate and Air Program at the Environmental Defense Fund. He pointed out that, although environmental groups may have numerous researchers and scientists, they need information from industries to develop sustainable and feasible environmental practices.<sup>10</sup> Furthermore,

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<sup>9</sup>For detailed explanations on relevant studies highlighting bureaucratic expertise, see Brierley et al. (2023).

<sup>10</sup>The interviews were conducted on June 6, 2023, and September 13, 2023. Dr. Michael Oppenheimer has graciously agreed to contribute his insights to this article. His perspective on the various resources and inputs provided by environmental groups and industry aligns with the underlying assumption of the model that efforts are complementary.

he noted that collaboration between companies and environmental groups can yield "new information" by pooling their resources, a synergy that continues to mutually benefit both parties. This perspective offers an alternative notion to the commonly held preconception of greenwashing regarding the collaboration between firms and environmental groups. Should partnerships significantly favor one party, they may become singular events, thereby reducing environmental groups' incentives to build lasting relationships with industries. Nonetheless, it is worth noting that the history of such partnerships spans the past twenty-five years.<sup>11</sup>

The model can undoubtedly accommodate various extensions. The assumption of complementary efforts reflects the diverse resources and inputs that environmental groups and firms contribute. For example, environmental groups offer expertise in climate mitigation, and firms provide information about their pollution levels or the processes of producing polluting chemicals in their facilities. However, another scenario of interest might still arise when efforts are perfect substitutes, with the quality function  $\chi$  being  $\frac{1}{2}\chi_1 e_1 + \frac{1}{2}\chi_2 e_2$ .<sup>12</sup> In such a case, the compromise favors an interest group with a higher impact of efforts, and the optimal policy becomes more sensitive to the polarization of interest groups' ideal policy. However, both groups still obtain policy gains when they collaborate. As this does not present a substantial difference from the key results obtained under the original assumption, I opt not to address it to economize space.

#### **4. Evidence: Partnerships between Firms and Environmental Groups**

The dynamics of partnerships between firms and environmental groups provide evidence consistent with theoretical predictions: interest groups can achieve policy gains by collaborative efforts, even if it means compromising on their ideal policy preferences. On the basis of theoretical results, I present three hypotheses that will be tested empirically.

<sup>11</sup>To obtain further details regarding the history of collaborations between companies and environmental groups, refer to this [website](#).

<sup>12</sup>This function is derived from the constant elasticity of the substitution production function.

First, I examine the compromise between firms and environmental groups. To demonstrate this compromise in policy preferences, I leverage the fact that polluting firms have strategically highlighted R&D and technological issues in climate debates. Abundant qualitative evidence suggests that business actors strategically discuss R&D and technological issues to attempt to reframe climate policy and weaken EPA's justification for emission cuts (e.g., [Supran and Oreskes 2021](#); [Downie 2017](#); [Grumbach 2015](#); [Schlichting 2013](#)).<sup>13</sup> To give an example, ExxonMobil highlights its contributions to climate actions with advertorials citing “our industry-leading investments in research and development,” such as the Global Climate and Energy Project at Stanford University, which implies that current solar or wind technologies are inadequate ([Supran and Oreskes 2021](#)). According to related witnesses and testimonies, business interests strategically use scientific research and technology to undermine efforts aimed at reducing emissions or to emphasize the uncertain costs associated with climate policies ([Schlichting 2013](#)).<sup>14</sup> This use of science to weaken anti-pollution efforts leads to my first hypothesis, namely, that comments written by strategic partnerships would emphasize R&D and technological issues more than comments written by environmental groups alone. However, the extent of the slant toward R&D topics in the comments would be less pronounced than what is observed in comments authored solely by business interests because comments written as an outcome of strategic partnerships are a compromise between the two groups.

*HYPOTHESIS 1. (Compromise) Comments from strategic partnerships between firms and environmental groups would fall in the middle of the issue dimension, with one end representing a business-friendly topic (R&D) and the other end representing an environmental group-friendly topic (reduction).*

<sup>13</sup>Still, large firms have not provided emissions reduction targets despite saying they want to reduce their impact on climate change. They have made R&D and technology commitments but have struggled to cut emissions. Eavis, P., & Krauss, C. (2021, May 12). What's Really Behind Corporate Promises on Climate Change? The New York Times. <https://www.nytimes.com/2021/02/22/business/energy-environment/corporations-climate-change.html>

<sup>14</sup>I empirically test the qualitative evidence in Appendix C.1 through granular analysis of Granger causality, using R&D coverage and CO2 data. The analysis reveals a strong correlation between CO2 measurements and R&D coverage, indicating that an increase in emissions is followed by an increase in R&D coverage.

Despite compromises in policy preferences, both interest groups achieve policy gains by collaboration. I have not explicitly measured policy quality, because the consequences of environmental regulations can be long-term and the definition of what constitutes a "good" policy can be highly subjective and controversial. However, we can still make some inferences about how comments from partnerships connect to policymaking. Specifically, if partnerships produce more informative comments that are more likely to be accepted by regulators for developing policy details, we can conclude that, by providing rich information to regulators, collaboratively crafted proposals contribute to a more sophisticated policy design.

Based on this inference, the second hypothesis focuses on whether the collaborative efforts of firms and environmental groups can convey more expertise to regulators. Firms can better frame their private information in conjunction with environmental groups' expertise in climate mitigation strategies, community-level knowledge (Bolden et al. 2018), or scientific research presented by environmental groups that concern the likely impact of further pollution (Bromley-Trujillo et al. 2014). And environmental groups can access private information that firms hold concerning the types of pollutants firms produce or the processes of generating those pollutants. Based on this reasoning, I posit that comments formulated by collaborative efforts between firms and environmental groups contain the comprehensive scientific reasoning and specific information sought by regulators to develop technical aspects of a policy, as compared to other forms of comments written separately by each group. The nature of collaborative comments leads to my second hypothesis:

*HYPOTHESIS 2. (Augmented Expertise): Comments crafted by collaborative efforts between firms and environmental groups contain a greater amount of scientific evidence and specific information compared with comments written separately by either environmental groups or business interests.*

Lastly, regulators who implement environmental regulations require an understanding



of various solutions to reducing pollutants and greenhouse gas or the unexpected consequences of alternative regulatory standards (Coglianese 2007). Therefore, expertise is a key factor in policy design and regulators value the specialized knowledge that reveals the intricacies of the policy landscape. Given that comments arising from the joint efforts of firms and environmental groups are more informative than other types of comments, I hypothesize that the comments produced by the collaboration of firms and environmental groups will have a greater impact on the policy outcome compared with comments written independently by either business interests or environmental groups. Hence, my final hypothesis is the following:

*HYPOTHESIS 3. (Political Influence): Comments from joint efforts are more likely to influence policy amendments than other types of comments, among comparably resourced comments.*

#### **4.1. Data and Stylized Facts**

I use an original dataset containing 15,883 comments officially submitted on *Greenhouse Gas Emissions Standards* from 2011 to 2020; the dataset does not have duplicates.<sup>15</sup> The policy comments were submitted for the EPA's regulatory review of the Greenhouse Gas Emissions Standards under sections 111 and 112 of the Clean Air Act, for which the EPA opened notice-and-comment periods seven times.<sup>16</sup> The year 2011 was chosen as a starting point because it immediately follows the new rules in which the EPA expanded emission regulations to a wide range of industries. The 10-year time period ensures that I am able to observe how both Republican and Democratic administrations respond to policy comments. As noted on the website of the Environmental Defense Fund,<sup>17</sup> the history of strategic partnerships with

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<sup>15</sup> Regulations.gov includes data including the proposed policy, finalized amendments, and the comments associated with them. All rules and associated comments are linked by a docket number. A docket number is a unique identifier created by agencies that follow a regulation throughout its rulemaking process. The specific docket IDs used to collect public comments includes "EPA-HQ-OAR-2010-0505" and "EPA-HQ-OAR-2014-0827".

<sup>16</sup> Following is the list of starting dates the EPA posted for each notice and comment period: 1) November 30, 2011, 2) May 13, 2013, 3) July 22, 2014, 4) January 5, 2015, 5) November 17, 2015, 6) April 1, 2016, and 7) August 9, 2017.

<sup>17</sup> Refer to Figure B.3, which displays a screenshot of the Environmental Defense Fund's website.

business interests traces back to the 1980s. Between 2011 and 2020, these partnerships have remained unchanged in terms of temporal variation between firms and environmental groups. Comments from individuals without organizational affiliations tend to be simple endorsements focused on support for or opposition to a proposed policy. To compare comments that provide substantive information, comments from individuals who lack any association with entities or organizations are dropped from the main analysis. Ultimately, using company/organization identifiers and automated text analysis, I filter 903 comments submitted by companies, entities, or organizations and I use these filtered comments as the basis of my analysis.<sup>18</sup>

Comments are classified into five categories: 1) environmental groups with business partnerships, 2) environmental groups without business partnerships, 3) business associations (e.g., trade associations), 4) single businesses, and 5) others such as universities or government agencies.<sup>19</sup> One interesting pattern to note about this collection of comments is that recognizable polluting firms (e.g., Exxon, BP, Ford, or General Motors) submitted relatively few comments by themselves. Most of the single firms that participated in the rulemaking process by themselves are "green firms" or small local businesses. The classification is operated by two measurement strategies. First, I provide the conservative measure of strategic partnerships between firms and environmental groups based on explicitly visible evidence. I retrieve the history of environmental groups' websites for the prior decade using the Wayback Machine, and code if environmental groups have explicitly posted polluting firms as partners.<sup>20</sup> Next, I reference the classification framework of

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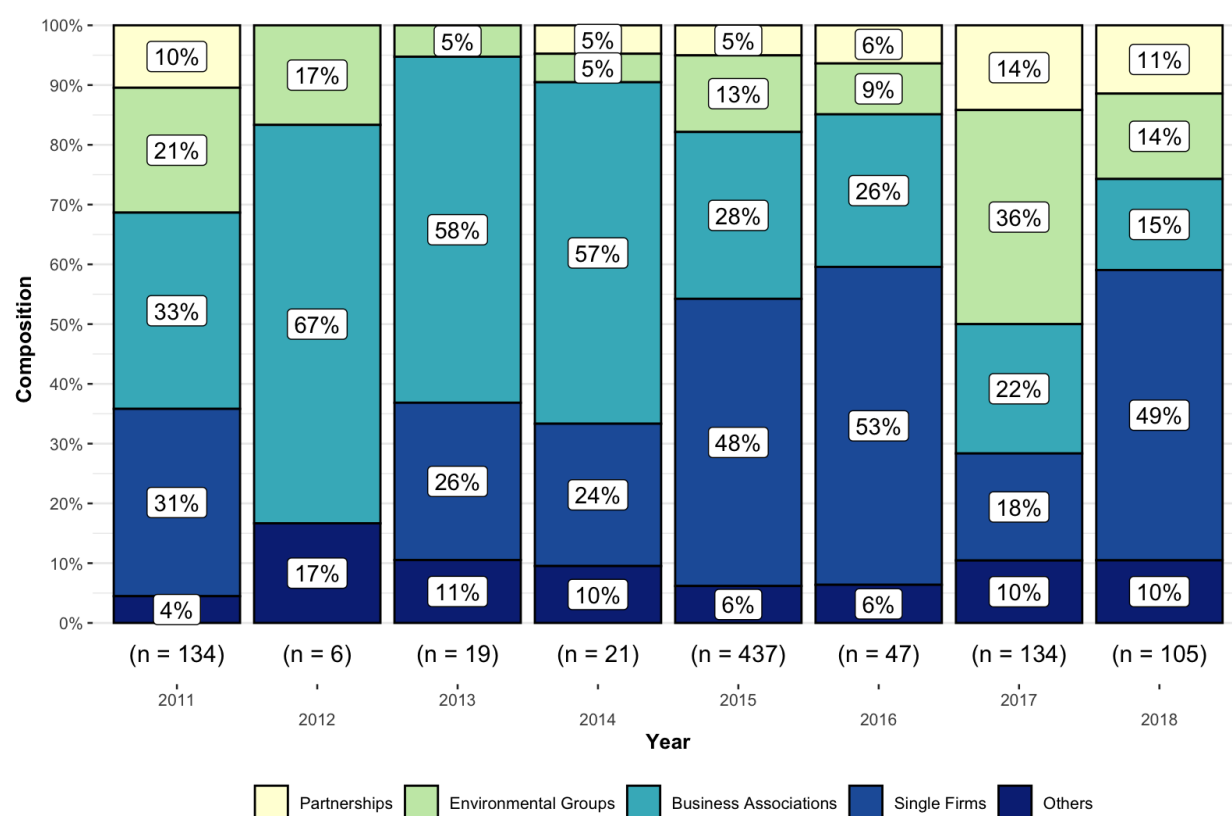
<sup>18</sup>There is no systematic correlation between the number of comments by type and participation year.

<sup>19</sup>I used three criteria to identify environmental groups. First, I required that these groups had a mission primarily relating to climate change and public policy. Second, the groups were membership-based organizations. Finally, the group's membership included diverse categories of political actors, such as citizens, consumers, and environmentalists. For instance, although it is introduced as a pro-climate coalition in the press, the group is categorized as a business association if the membership is limited to firms. The detailed codebook providing justification for the classifications is available under separate cover.

<sup>20</sup>The measurement strategy focuses solely on partnerships between environmental groups and firms operating within polluting industries such as energy, transportation, oil, or coal. It does not consider partnerships between environmental groups and green firms within renewable energy or green technology industries. Although there are a few instances of environmental groups collaborating with green firms,

Cory et al. (2021) to double-check the validity of the memberships lists that I collected from other sources.<sup>21</sup> The main analysis presented in this paper is based on the most conservative measure of partnerships between polluting firms and environmental groups constructed from explicit evidence- environmental groups' websites. In total, I have 541 unique entities in my data. The summary statistics are provided in the Appendix,<sup>22</sup> and the codebook is available separately.

FIGURE 2. Comment Participation With Time



No comments were submitted by organizations in 2019 and 2020. EPA did not open the notice-and-comment period in 2012 and 2013 but comments were still submitted by individuals.

Figure 2 presents the composition of the comments across time. On the whole, policy

partnerships with polluting firms are more widespread.

<sup>21</sup>Unfortunately, Cory et al. (2021) classification covers approximately one hundred firm-centered climate coalitions. So it was not enough to fully validate the strategic partnerships of firms and environmental groups examined in this analysis.

<sup>22</sup>See Table B.3 in Appendix.

comments by business associations and single firms represent the plurality of comments most of the time.<sup>23</sup> With time, there has been a gradual decrease in the percentage of comments from business associations and a stable trend in the percentage of comments from the partnerships between firms and environmental groups. The increase in the percentage of comments from single firms might mean an increase in participation from "green" firms. Although the frequency of joint coalitions' participation in rulemaking seems to be smaller than that based on other types of comments, the information conveyed by joint coalitions to regulators tends to be richer than the information from other types of comments. The next section substantiates this statement empirically. I also construct a variable to control for group characteristics, such as staff size. Data for this variable are collected from various sources, including *InfluenceWatch*, which provides descriptions of political actors involved in public policy issues, and from firms' websites, LinkedIn, Indeed, Buzzfile, Rocketreach, or Glassdoor to control for group characteristics such as staff size.<sup>24</sup>

#### **4.2. Hypothesis 1: Compromised Policy Preferences**

In this section, I test Hypothesis 1. To empirically demonstrate a compromise, I construct two measures to capture the prevalence of the topics favorable to business interests: 1) a count-based metric and 2) an embedding-based metric of R&D and technology coverage. The main analysis focuses on the second measure and the analysis using the count-based metric is provided in the Appendix. If comments from partnerships are positioned in the middle of the issue dimension, with each end representing the topic favored by respective interest groups, we can infer that there is a compromise in policy preferences.

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<sup>23</sup>This observation is consistent with [Golden \(1998\)](#)'s finding that a huge percentage of comments are from business interests.

<sup>24</sup>When employment size is indicated in ranges, the upper bound is coded as the staffing size of the group.

## Measuring issue slant towards R&D and Technology

As a count-based metric conveys little information about the context in which words are used, I apply a text embedding method that enables words to encode meaningful information about analogies. Political science research has used *Word2Vec* which embeds words in a low-dimensional vector space using neural network structure (e.g., [Rodriguez and Spirling 2022](#)). This method results in a set of vectors whereby proximity in vector spaces implies similar meaning context-wise, and vectors distant from each other have different meanings. For instance, “diligent” and “industrious” would be close together, whereas “diligent” and “lazy” would be relatively distant from each other. On the basis of embedding methods, I allow the algorithm to assign each word to a vector in a shared space during the training stage, and these assignments create clusters of words that are semantically connected. As a result, the more similar the context, the closer two words are located in geometric space.

Built on this advance in modern natural language processing technique, I use *Paragraph Vector* proposed by [Le and Mikolov \(2014\)](#), an unsupervised framework that learns continuously distributed vector representations at the comment level. In the *Paragraph Vector* framework, each document is mapped to a unique vector while each token is also mapped to another unique vector. They are then averaged to predict the next words in each sentence. Similar to Word2Vec’s continuous-bag-of-words model, this approach is based on a distributed memory model whereby document vectors can be acquired by the task of predicting a word based on an average in consideration of context and full document levels.<sup>25</sup> I construct a model with a window size of five, and I do not consider words that are observed less than five times in the entire corpus.<sup>26</sup>

As explained earlier, a key feature of word embeddings is that the difference between word vectors in the geometric space conveys meaning. For instance, the difference between

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<sup>25</sup>See Figure C.2 for further details about the paragraph vector framework.

<sup>26</sup>The analysis reported in this paper was implemented by Doc2Vec Gensim and python3 on December 29, 2022. The parameters epoch is specified as 200. Typically epochs are set to be between 50 and 200.

the two vectors,  $\overrightarrow{R\&D} - \overrightarrow{Reductions}$ , identifies an issue dimension in the space by taking the difference between the normalized vector across a set of research words and the average normalized vector across a set of emission words:<sup>27</sup>

$$\overrightarrow{R\&D} - \overrightarrow{Reduction} = \frac{\sum_n \overrightarrow{R\&D}_n}{|N_{R\&D}|} - \frac{\sum_n \overrightarrow{Reduction}_n}{|N_{Reduction}|}$$

Therefore, the vector difference corresponds to the issue slant towards the R&D direction and can be substantively interpreted as a degree to which a proposal is leaning towards the issue of R&D instead of emission cuts. Note that word vectors and document vectors live in the same space by the way that *Paragraph vector* is constructed. By the geometry of vector space, I measure the cosine of the angle between the inferred vectors of the issue slant and each document vector.<sup>28</sup> This approach represents an integration of supervised and unsupervised learning techniques, combining text embeddings with a set of topics selected by researchers based on substantive concerns. The details of the analysis are also provided in Appendix C.2.

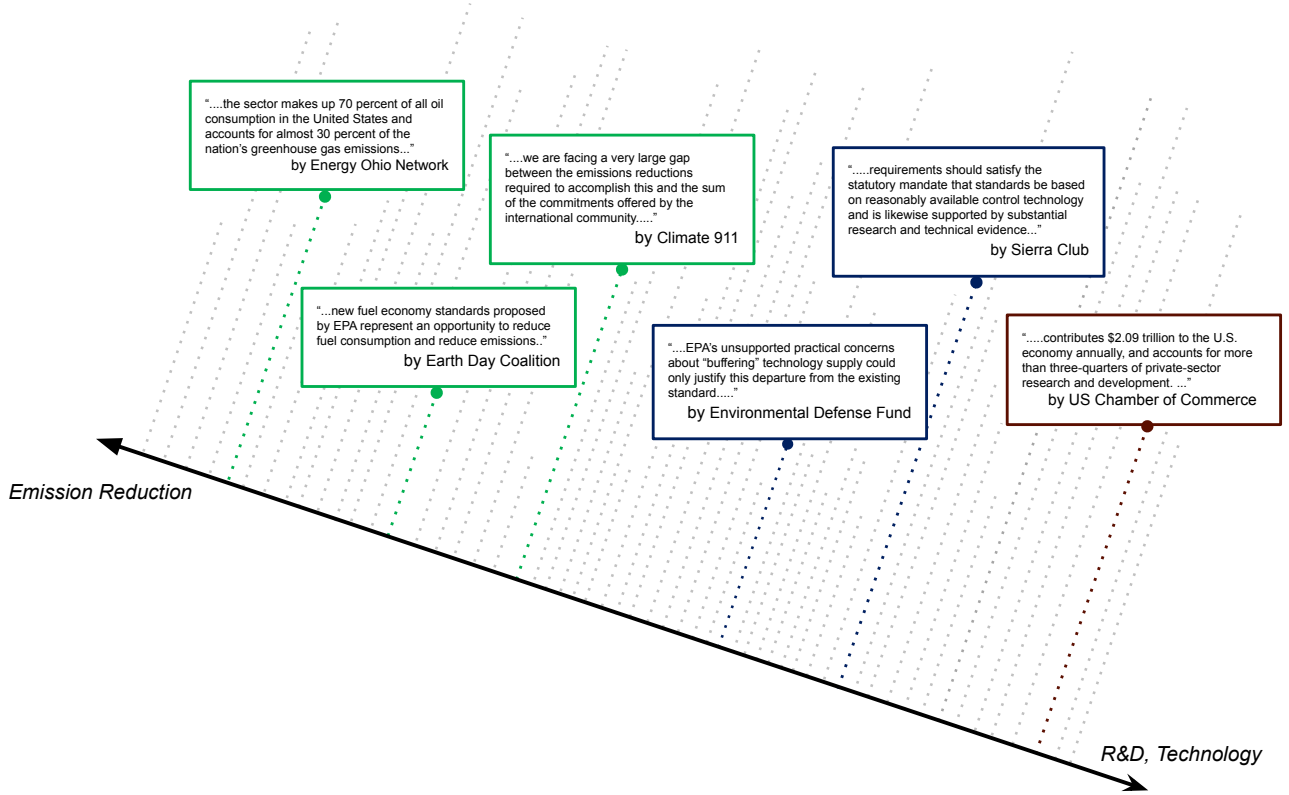
The cosine similarity metric enables a substantive interpretation of each comment's inclination towards emphasizing the topic of R&D and technology. Ranging from -1 to 1, the score indicates the emphasis in a document on R&D compared with the emphasis on reductions. A score close to 1 suggests a tendency to emphasize R&D, whereas a negative score implies a skew toward emission reductions.<sup>29</sup> Figure 3 depicts a schematic representation of the vector projection used in this method. It is evident that comments submitted by environmental groups in collaboration with business partners, such as the Sierra Club or Environmental Defense Fund, exhibit a tendency towards R&D and technology-related aspects compared with comments from environmental groups that lack business partner-

<sup>27</sup>The vocabularies are geometrically close vocabularies in the embedding spaces trained on comments. See the Appendix for more details concerning R&D and Technology vocabularies and emission reduction vocabularies. The vector dimensionality of the analysis presented in the paper is 200, and the Appendix provides a robustness check using models with the dimensionality of 1,000, and 10,000.

<sup>28</sup>See the Equation C.3 for the mathematical formula.

<sup>29</sup>See Appendix C.3 for further discussions on the interpretation of cosine similarity.

FIGURE 3. Schematic illustration of vector projection



ships. However, comments from partnerships are relatively less skewed compared with comments from business interests alone, which demonstrates a notable bias toward *R&D* directions. I use the similarity score for each comment  $i$  submitted by  $k$  in a time period  $t$  as a dependent variable and run an ordinary least squares regression.<sup>30</sup> Specifically, I estimate the following model:

$$\text{Similarity Score}_{ikt} = \alpha + \beta_1 \text{Strategic Partnership}_i + \delta Z_k + \tau_t + \epsilon_{ikt} \quad (2)$$

, where  $Z$  denotes the group-level control variable and  $\tau$  are year-fixed effects. The specifica-

<sup>30</sup>The cosine similarity score used in Table 1 is measured with 6 vocabularies. For robustness checks, the same analyses are repeated using different numbers of vocabularies: 1, 2, 3, and 9. Further details can be found in the Appendix.



tion controls for group-level characteristics because there might be a systematic difference in research capacities due to staff size.<sup>31</sup> The error term is  $\epsilon_{ikt}$ .

TABLE 1. Regression Models Examining the Issue Slant toward R&D versus Greenhouse Gas Reductions

Baseline	Environmental Groups	Business Association	Environmental Groups
Sample	Partnerships + Environmental Groups	Partnerships + Business Association + Single Firms	Whole Sample
	(1)	(2)	(3)
Partnership	0.128** (0.049)	-0.062*** (0.016)	0.016** (0.008)
Single firms		0.008 (0.013)	0.028*** (0.005)
Business associations			0.042*** (0.009)
Others			0.031*** (0.007)
Staff Size	✓	✓	✓
Year FE	✓	✓	✓
Commenter FE	✓	✓	✓
Mean Outcome	0.06	0.092	0.085
Observations	225	683	903
R2 Adj.	0.318	0.456	0.066

\*p < .1; \*\*p < .05; \*\*\*p < .01. In the first column, the reference category is *environmental groups*, while in the second column, it is *business associations*. For the third column, the reference category remains *environmental groups*. Standard errors are clustered by notice and comment periods in parentheses.

The first column of Table 1 examines comments from environmental groups, both with and without business partners, and the second column is focused on comments from environmental groups with business partners, business associations, and individual firms. The reference category for the second column is business associations. The last column identifies a correlation between the slant towards *R&D* and technology and the types of comments in the entire dataset. Comments from environmental groups without business partners serve as the reference category. The full results, including all control variables and fixed effects, are presented in Table C.5. Overall, comments from business associations tend to be slanted most towards the topic of *R&D*. Comments from the “others”

<sup>31</sup>The summary statistics are given in the Appendix.

category also tend to be skewed towards *R&D* topics because a substantial number of comments in this category are from universities. This empirical evidence lends support to the *Compromised Policy Outcome* hypothesis; the policy goals of firms and environmental groups are reconciled when jointly working together. For robustness check, I construct another measure to capture the prevalence of the topic, a frequency-based metric of *R&D* and technology coverage. The results are presented in Section C.5 of the Appendix.

### 4.3. Hypothesis 2: Achieving a Higher-quality Proposal for a Higher-quality Policy

In this section, I investigate the effect of strategic partnerships between firms and environmental groups by the amount of technical and analytical information in the comments.

To construct a measure of information quality, I use an information retrieval technique to extract technical and informative chunks from unstructured raw text documents. The primary problem to be tackled when measuring information is the identification of scientific entities or languages that convey specific information. Although crowdsourcing is one method for performing manual, human-oriented tasks, the expertise required to extract scientific evidence or analytical facts makes crowd-sourcing impractical (Bonney et al. 2014, 2009). Therefore entity recognition techniques have been widely used in academic disciplines to quantify information (e.g., Liu et al. 2021; Hong et al. 2020). This technique operates by locating and classifying proper nouns into categories, such as organizations (e.g., companies, government organizations, committees), local-level knowledge (e.g., cities, countries, rivers) or measurement.<sup>32</sup> In total, eighteen categories are used to measure the amount of scientific information.<sup>33</sup>

Figure 4 illustrates the application of the information retrieval technique to comments.

<sup>32</sup>The analysis presented in the paper is implemented by SpaCy v3.0, an open-source library for advanced language processing, on December 27, 2022. This transformer-based pipeline has an accuracy of 89.8.

<sup>33</sup>Eighteen classes include PERSON, NORP, FAC, ORG, GPE, LOC, PRODUCT, EVENT (Named hurricanes, wars, natural disasters, and so on), WORK OF ART (titles of books and so on), LAW (Named documents made into laws), LANGUAGE (any named language), DATE (absolute or relative dates or periods), TIME (times smaller than a day), PERCENT( percentage, including “%”), MONEY (monetary values, including unit), QUANTITY (measurements, as of weight or distance), ORDINAL(“first”, “second”, etc.), CARDINAL (numerals that do not fall under another type). See the Appendix for further details.

FIGURE 4. Illustration of Information Retrieval Techniques for Public Comments

Nevertheless, to the limited extent that information is available, the emission inventories indicate that fugitive or vented emissions from gas processors and compressors can be extremely high. For example: Merit Energy Company's **ORG** Anschutz Ranch East Gas Plant in Wyoming **GPE** reported 276 tons **QUANTITY** of fugitive VOCs in 2013 **DATE**. Merit Energy Company's Halfmoon Battery **ORG** reported 178.1 tons **QUANTITY** of vented and fugitive **VOC NORP** emissions in 2013 **DATE**. A fraction of that total came from fugitives ( 5.5 tons **QUANTITY** ) while most was vented ( 172.6 tons **QUANTITY** ). DCP Midstream's **ORG** East Texas Gas Plant **ORG** (RN102805272) leaked and vented 326 tons **QUANTITY** of VOCs in 2012 **DATE** and 206.5 tons **QUANTITY** in 2013 **DATE**. Exxon Mobil's **ORG** King Ranch Gas Plant **ORG** (RN102488517) released 306.87 tons **QUANTITY** of fugitive and vented VOC emissions in 2012 **DATE** and 142.63 tons **QUANTITY** in 2013 **DATE**.

#### A. Comment Submitted by Clean Air Council

We encourage stricter controls for emissions and are concerned about keeping our country air clean from industrial wastes going into our air near homes, schools, and animal habitats. even during drilling, fracing, flaring are changing our air quality at a fast and increasing rate. We know of families near gas sites that complain of the continual odors and having headaches, nose-bleeds, throat issues and breathing issues from exposure. I have felt adversely affected by being near these sites within fifteen minutes **TIME**. Thank you for your attention to this important matter concerning our health.

#### B. Comment Submitted by Citizens For Clean Water

The colored boxes represent the technical details identified by this approach. Each box is marked to display the named entities identified by the technique. For instance, the example demonstrates that the named entity recognition technique successfully captures organizations discussed in the comment submitted by the Clean Air Council, such as Merit Energy Company or Exxon Mobile, as well as various locations such as King Ranch Gas Plant, East Texas Gas Plant, or Wyoming. Furthermore, the technique identifies quantities of emissions (e.g., 326 tons) and specific dates. However, in the comment submitted by Citizens for Clean Water, there are only a few colored boxes because the comment does not include any specific or scientific evidence. During the validation process, the frequency of false-positive identifications is noticeably smaller than the frequency of false-negative identifications, suggesting that the named entity recognition provides a conservative measure of expertise. Additional details regarding human validations are presented in Appendix D.1. I use the number of all the colored boxes in each comment as a measure of expertise and estimate the effect of a strategic partnership on it. Formally, the dependent

variable is a count variable that represents the number of detected named entities in each comment. Negative binomial models are presented in the main analysis, considering the count data. Quasi-Poisson models are used as a robustness check, and the analysis is presented in Tables D.3 and D.4.

TABLE 2. Negative binomial model estimating the quantity of information

Baseline	Environmental Groups		Business Association		Environmental Groups	Business Association
Sample	Partnerships + Environmental Groups		Partnerships + Business Association + Single Firm		Whole Sample	
	(1)	(2)	(3)	(4)	(5)	(6)
Partnership	0.705*** (0.149)	2.670*** (0.366)	0.760*** (0.141)	1.878*** (0.582)	0.864*** (0.148)	0.730*** (0.135)
Single Firm			-0.355*** (0.090)	-0.033 (0.538)	-0.200* (0.117)	-0.334*** (0.089)
Business associations					0.134 (0.123)	
Environmental groups						-0.134 (0.123)
Others					0.167 (0.167)	0.033 (0.152)
Issue Slant (R&D and Technology)	1.301 (0.791)	-0.123 (1.426)	-0.429 (0.530)	0.069 (1.479)	-0.237 (0.462)	-0.237 (0.462)
Staff Size	✓	✓	✓	✓	✓	✓
Commenter FE		✓		✓		
Year FE	✓	✓	✓	✓	✓	✓
Observations	225	225	683	683	903	903

\* $p < .1$ ; \*\* $p < .05$ ; \*\*\* $p < .01$ . Standard errors are clustered by notice and comment periods in parentheses. In the fifth column, the reference category is environmental groups, while in the sixth column, it is business associations.

The negative binomial model controls the issue slant toward R&D and technology constructed in the previous section because that topic is likely to be accompanied by technical details. Table 2 suggests that comments from strategic partnerships generally have more technical information than comments from other entities. Across all models, *Partnership* consistently shows a positive and statistically significant relationship at the 0.01 level. Overall, we observe that the magnitude of the partnership effect is significantly larger when the reference category is environmental groups. These findings lend confidence to the theoretical expectations that both firms and environmental groups derive advantages from investing in joint efforts. Table D.1 in the Appendix presents the full results.

#### 4.4. Hypothesis 3: Political Influence of Strategic Partnerships on Regulatory Outcome

I investigate the political influence of strategic partnerships on environmental regulations by examining whether comments from the joint efforts of firms and environmental groups affect policy amendments during the notice and comment period. Specifically, I estimate the effects of *Partnerships* on two dependent variables: (1) the divergence scores from information theory and (2) a binary variable that indicates whether a comment was cited by EPA officials in the final rule after the notice and comment period.

##### Quantifying Political Influence Using Information Theory

In this section, I examine whether the increased quantity of knowledge translates into political power in regulatory politics by capturing distribution similarity. The intuition of this analysis is to examine how likely it is that a comment and a policy amendment come from the same probability distribution. I particularly use divergence scores from information theory because relative entropy captured via divergence score denotes how close two samples are to each other. Given that the vectors in this context indicate probability distributions, the cosine angle is inappropriate because it fits for vector space modeling. Therefore, I use Jensen-Shannon (JS) divergence score as a metric of statistical distance.<sup>34</sup> JS divergences have been widely used in social science research as a similarity measure of sparse data.<sup>35</sup> Divergence scores close to 0 indicate a closer statistical distance, implying that two samples are likely to be from the same probabilistic distribution.<sup>36</sup>

A finalized rule is generally a hundred-page document, whereas policy comments tend to focus on a few provisions of a proposed policy. Capturing the statistical distance between each comment and a huge corpus of the entire policy would underestimate the influence

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<sup>34</sup>The Kullback-Leibler (KL) measure is inappropriate in this context as it is an asymmetric measure, leading to different scores for A to B and B to A. The algebraic reason is that  $D(P||O) - D(O||P)$  is equal to  $\sum_i^n \ln(\frac{P_i}{O_i})(P_i + O_i)$  and there is no reason for this to be 0. Refer to the Appendix for further details.

<sup>35</sup>See Section E.2 in the Appendix for the mathematical proofs justifying the use of JS divergence as a test statistic and the detailed procedure of this analysis.

<sup>36</sup>See Appendix E for further details of the analysis.

of each comment on rulemaking, because a finalized rule is sparse, and particular provisions are supposed to be examined during the notice-and-comment process. Therefore, I construct a set of clauses updated after the notice-and-comment period and use the set as a basis of analysis to quantify the influence of comments on finalized policy outcome. If a policy amendment is likely to be from the same distribution of comments by partnerships of environmental groups and firms, we can infer that the joint efforts of firms and environmental groups exercise political leverage over climate regulations. There might be some concerns that this analysis would capture linguistic similarity or legal formalism between comments and policies, instead of the influence of comments on policy changes. To address this concern, I control the JS divergence score to a proposed policy posted by EPA officials before the notice and comment period. The model specification is similar to the one estimated in the previous section, with the exception that I include administration fixed effects because Republican politicians are generally considered business-friendly and prioritize policies that put business interests over environmental concerns.

Although the primary focus of the analysis centers on the provision of information, the decision of firms and environmental groups to collaborate could result from a multifaceted strategic interaction. To account for the signaling mechanism whereby regulators may find the diversity within partnerships more appealing (Lorenz 2020; Phinney 2017; Mahoney 2007),<sup>37</sup> I combine a dataset of public comments with interest group ideal point estimates, referred to as "IGscore," introduced by Crosson et al. (2020). Then, I estimate the preference gap by calculating the absolute difference between the highest IGscore of firms and the lowest IGscore of environmental groups.<sup>38</sup> For single entities, the absolute difference is 0.

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<sup>37</sup>Most literature on coalition lobbying is based on a signaling model which suggests policymakers find diverse coalitions' signal more credible for the following reasons. Interest-diverse coalitions can synergize their advocacy tactics and network, and they send a more heterogeneous signal to legislators about the quality of a legislative proposal. Third, diverse coalitions are harder to maintain, making their legislative signals costlier. Thus, legislators have reason to believe that bills favored by diverse coalitions are more deserving of their attention and support than those favored by homogeneous coalitions, all else equal. However, it is worth pointing out that the canonical signaling models including Crawford and Sobel (1982) do not lead to policy bias but only to the reduction of uncertainty.

<sup>38</sup>Environmental groups tend to work with multiple business partners.

## **Capturing Political Influence Using Citations by EPA officials**

Alternatively, I measure the political influence of comments by examining citations made by EPA officials. After the notice and comment period, EPA officials consider the comments submitted on a proposed policy and decide whether to revise the regulations accordingly when issuing a final rule.<sup>39</sup> When posting the finalized amendments, EPA officials add supplementary information; they provide a broad executive summary and explain the regulatory background of final standards. In addition, EPA officials summarize the significant comments, and they respond to those comments in a document that announces a final rule.

To estimate the influence of strategic partnerships on regulatory outcomes, I specifically focus on a final rule that was posted on March 12, 2018. The finalized policies posted by EPA officials take various inconsistent forms. In most cases, EPA officials make broad and generic statements that summarize the collection of comments without referencing specific commenters or comment IDs. However, for the March 2018 rule, the officials explicitly included comment IDs or commenters that regulators considered to update a proposed policy. Using this final rule as the basis for analysis, I construct a binary indicator that is coded as 1 if a comment is specifically cited by EPA officials in their response.<sup>40</sup> The “others” category is dropped from the analysis because there were few comments in that category on the rule on March 12, 2018.

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<sup>39</sup>Sometimes the agency extends or reopens a comment period because it has not received enough comments. Similarly, the agency may find that people have raised new issues in their comments that were not previously considered in the initial proposed policy. As new issues or additional complexity arises, the agency may publish a series of proposed rules in the Federal Register.

<sup>40</sup>The purpose of opening the notice and comment period in 2017 and 2018 was to make amendments to two specific provisions related to the requirements for the collection of emission components at well sites. In the final rule, the agency announced the removal of the requirement for the repair of a component within 30 days of the detection of fugitive emissions. See Appendix E.5 for further details concerning the rule posted in March 2018.



## Results

Table 3 reports the coefficients of the probit model using citation patterns by EPA officials and the ordinary least squares model estimating JS divergence scores. The full results are presented in Table E.1. In all models, *Partnership* decreases the statistical distance and its effect is statistically significant (Columns 1 and 2). A finalized policy outcome tends to have a closer statistical distance to comments from joint efforts, namely more informative comments that contain a larger amount of scientific reasoning and specific evidence. Columns 3 and 4 further show that comments from joint efforts by firms and environmental groups are more likely to be cited by EPA officials when the reference category is environmental groups, while their confidence intervals overlap with zero when the reference category is business associations. However, the effect of partnerships is more pronounced than in any other category across the models. If the signaling perspective holds true, a higher absolute difference between IGscores would lead to a reduced statistical distance to a finalized policy or more citations by EPA officials. However, we do not find any effect of IG scores on the JS divergence scores and citations by EPA officials.<sup>41</sup> This demonstrates that enhanced expertise as a result of joint efforts by firms and environmental groups translates into political power in the rulemaking process, controlling the difference between IGscores.

### 4.5. Discussion of Empirical Analysis

This analysis tackles complex empirical tasks. The quantification of information provision by interest groups is particularly challenging because of the inherently subjective and elusive nature of information, and the lack of necessary data. Although this article could benefit from recent advancements in machine learning to measure key concepts, acknowledging the assumptions and limitations opens up avenues for further research.

First, while the analysis focuses on information exchange between firms and environ-

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<sup>41</sup>In the Appendix, I conduct analyses without considering commenter types and observe a negative relationship between the absolute difference of IGscores and JS divergence scores. See Table E.2.

TABLE 3. Regression Models Estimating JS Divergence Scores and Citation by EPA Officials

	<i>JS Divergence Scores</i> (OLS)		<i>Citation By EPA Officials</i> (Probit)	
	(1)	(2)	(3)	(4)
Partnership	-0.031*** (0.003)	-0.015* (0.009)	0.512 (0.679)	1.737** (0.720)
Environmental groups	-0.015** (0.007)		-1.225*** (0.396)	
Single firm	-0.001 (0.003)	0.014*** (0.004)	-0.445 (0.346)	0.779* (0.426)
Business associations		0.015** (0.007)		1.225*** (0.396)
Absolute difference between IGscores	0.002 (0.004)	0.002 (0.004)	0.207 (0.497)	0.207 (0.497)
Staff Size	✓	✓	✓	✓
Administration FE	✓	✓		
JS Divergence to a proposed policy	✓	✓		
Observations	903	903	181	181

\* $p < 0.1$ ; \*\* $p < 0.05$ ; \*\*\* $p < 0.01$ . Standard errors are clustered by notice and comment periods in parentheses (columns 1 and 2). Since our analysis focuses on single notice and comment periods that overlap both the Obama and Trump administrations, we do not have control over the years of submission. Therefore, the analysis using citation patterns by EPA officials (Columns 3 and 4) does not consider the years of submission as a controlled factor. In the first and third columns, the reference category is business associations, while in the second and fourth columns, it is environmental groups.

mental groups, there may be valid concerns that financial and information exchanges are not mutually exclusive. Interestingly, some environmental groups have very strict corporate giving policies, which explicitly state that they do not accept donations from entities with expected conflicting interests. Specifically, Figure F.1 illustrates the EDF's policy, which prohibits receiving money from firms whose environmental performance conflicts with the organization's mission or introduces potential conflicts of interest. Additionally, following the approach taken by [Bertrand et al. \(2020\)](#) on charitable donations by interest groups to non-governmental organizations, I identified environmental groups that received corporate funding and found no significant overlap with those involved in the strategic partnership.

Second, although the analysis focuses on expertise defined by hard and quantitative

information, it does not deny the importance of soft information, such as individual experience or anecdotal evidence. Soft information can indeed be helpful for policymakers to broadly gauge public sentiment or endorsement of a policy. However, it is worth highlighting that the notice and comment period is intended to collect technical, subject-area domain expertise for the specific details of the policy. For example, the notice and comment periods announced on November 1, 2017, for *the Emission Standards for New, Reconstructed, and Modified Sources* included topics such as implementing the fugitive emissions requirements, well site pneumatic pump standards, and the requirements for certification of closed vent systems by a professional engineer.<sup>42</sup>

Lastly, the analysis does not consider whether a high-quality policy necessarily means a "good" policy empirically. The definition of a good policy can be contested, given the multi-dimensional consequences of regulations that entail societal or economic impacts despite the primary goal of reducing pollution. Moreover, although a policy may be meticulously designed to address a specific issue, the implementing agency might lack the necessary capacity or resources to translate the policy design into reality. However, since the quality of implementation also depends on the quality of what is being implemented, this article implicitly assumes that a policy crafted with subject-area expertise and comprehensive information will significantly contribute to reducing noise in policy outcomes. Further investigating the complexities involved in assessing what constitutes a "good" policy would be an interesting direction for future research.

## 5. Conclusion

Interest groups play a crucial role in policymaking. Canonical models of policymaking focus primarily on how interest groups compete using their policy-relevant information to realize their political interests. Conversely, empirical evidence points to interest-diverse

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<sup>42</sup>When opening a notice and comment period, the agency proposes the topics of discussion in the announcement. See the details of the notice and comment periods from this [website](#).

coalitions in which interest groups with divergent interests cooperate. What motivates them to collaborate despite their differing policy goals and how does the outcome of their collaborative efforts empirically manifest?

In this paper, I tackle this question by focusing on the dynamics of regulatory policymaking. Drawing upon a model of collaborative team policy production, I expect that compromise arises endogenously because the involved parties have incentives to produce high-quality details of the target policy. Using public comments on greenhouse gas emission standards and employing automated text analysis, I empirically demonstrate that environmental groups and polluting firms, despite their conflicting interests, craft public comments that incorporate a greater amount of scientific evidence and analytical information compared with other types of comments. On the basis of information theory and citation patterns by EPA officials, I further show that the enhanced expertise of strategic partnerships between firms and environmental groups has the greatest leverage on the final policy, even when controlling for the difference in ideology scores of the partnered interest groups.

I have not excluded the possibility that, in certain cases, regulators and interest groups may prioritize political interests, concerns about reputations or interest diversity. Instead, I argue that, despite such idiosyncrasies at the interest group or regulator level, there are strong reasons for both groups and regulators to be concerned about implementing high-quality policy, given the nature of regulatory policymaking where fine-grained and technical details of a policy are designed. This argument aligns with long-standing patterns in which partnerships between firms and environmental groups focus on research programs to create mutually beneficial solutions that can improve the details of the policy ([Rondinelli and London 2003](#); [Stadtler and Lin 2019](#); [Hartman and Stafford 1997](#)). Alternative perspectives might also view partnerships as a means for polluting firms to greenwash their reputations or images. However, a comprehensive analysis of 12,826 firms using ESG data from ([Eikon 2024](#)) reveals no correlation between firms' exposure to environmen-

tal and social controversies and their engagement in partnerships. Further details are provided in Section G of the Appendix.

The theoretical and empirical results are primarily focused on the stage after the coalition is formed, and this article is agnostic to the process by which interest groups select their partners from multiple options. Groups might prefer to collaborate with others who have greater resources or more influence. Alternatively, groups might be more willing to work with partners with a variety of political instruments.<sup>43</sup> Although these two mechanisms may not be mutually exclusive, the dynamics of how interest groups select partners and navigate complex relationships are an interesting avenue for future research.

In this article, I present a theory of cooperative policy production and offer evidence that the motives behind investing in joint efforts amid political rivalry are not solely a product of political interests or an incentive to signal credibility or diversity. Although I focus on interest group lobbying in environmental policymaking as an example, there are numerous opportunities to use this theory to understand generic phenomena whereby different political interests among members cannot be perfectly aligned, as is often the case in a "diverse" coalition. For example, in 1995, the National Governors Association represented a coalition of Republican Governors Association and Democratic Governors Association, with contrasting partisan orientations of its members. While its members had to negotiate their political interests, they produced a joint proposal that reframed welfare reform into a block grant, relaxing some of the work requirements and illegitimacy provisions and allocating more resources for child care (Haskins 2007). There are many possibilities for expanding the theory to encompass such broader contexts to consider when competing political goals can be reconciled and under what conditions they do so.

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<sup>43</sup>See Pulkkinen, Levi. (2021, March 12). Washington climate activists disagree about how to cut carbon, <https://crosscut.com/environment/2021/03/washington-climate-activists-disagree-about-how-cut-carbon>. There has been ongoing disagreement among environmentalists regarding strategies to reduce carbon emissions, and some environmental groups may find it more beneficial to collaborate with business interests, rather than working solely with other climate activists.

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