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**Sent:** ‎6/‎24/‎2015 7:22 PM  
**To:** [Dunham, Sarah](mailto:Dunham.Sarah@epa.gov)  
**Cc:** [Timothy Bower](mailto:naep@bowermanagementservices.com)  
**Subject:** Question from today's Webinar on the Clean Power Plan

Sarah Dunham,

Thank you for your informative presentation at the NAEP / Vermont Law webinar this afternoon.

One point of clarification please. By way of context - - I live and work on St. Croix, US Virgin Islands.

While listening to your presentation, I searched for and found EPA's web page on the October 2014 Supplemental Proposal ( <http://www2.epa.gov/carbon-pollution-standards/fact-sheet-clean-power-plan-supplemental-proposal> ).

Joining the webinar from under a ceiling fan and in front of a computer running off electricity generated by combustion of #2 diesel, imagine my surprise when I read:

             EPA is aware of two potentially affected sources in the U.S. Virgin Islands,

             however the sources have not operated for several years and are not operating now

             so the agency is not proposing a goal for this territory.

I thought the Clean Power Plan applied to all fossil fuel fired power plants, not just coal-fired power plants.

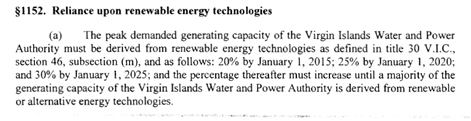
If the USVI is exempt due to size or fuel source, I may understand, but that should be reflected on the EPA web page.

To be fair to our local utility, I think the VI Water and Power Authority (WAPA) will meet the very modest 2030 threshold in the Clean Power Plan with renewables already on grid or in the pipeline. That notwithstanding, I think the territory should be included in the Plan, not exempted from it.

Inclusion will a) keep the pressure on the utility to accept higher grid penetration of renewables, and b) allow WAPA and USVI to rightfully receive the national recognition it deserves when it meets the 2030 milestone (albeit, a standard more easily achievable on a <150 MW peak grid than a multi-GigaWatt State grid).

Re. point a), last night in a public meeting, Black & Veatch, the WAPA contractor preparing a USVI Integrated (energy) Resource Plan made the point that WAPA will not likely be subject to EPA's Clean Power Plan. I.e., we are already planning our 20-year future energy portfolio on the basis that we are not subject to federal clean power goals.

Re. point b), Territorial law (VI Act 7075 Sec. 1152) requires WAPA to meet the following renewable energy goals. I.e. the federal Clean Power Plan is not an imposition greater than that already imposed on the utility by the territorial government. If we meet the territorial law, we should easily meet the federal Clean Power Plan goal.



I look forward to your position on why EPA feels USVI should be exempt from the Clean Power Plan. Certainly, as an island territory surrounded by rising and warming seas, we have more at risk from climate change than many of the states covered by the Plan. And, imposition of the federal goal has no greater socioeconomic impact than milestones already imposed by the territorial government (enacted by the legislature and signed by the governor).

Thank you,

**Paul**

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