

Date: February 6, 2014

NAAQS Meeting

Name	Organization	Phone Number
Dana Wood	BP	281-366-3489
Joseph Starks	Hunter + Williams	202-955-1500
Howard Feldman	API	202 682 8340
Teel Steichen	API	202 682 8568
Greg Bertelsen	NAM	202-637-3174
DAVID C. AILON	NOPH	202-842-0463
P J Wakely	TCGA	202-550-8289
M E Long	Clubs	216 694 7359
Pete Pugno	AISI	202-452-7122
ROB KAUFMANN	KCPS	202-879-8552
DAVID FRIEDMAN	AFPM	202 552-8461
Melissa Barbanel	Barrick	801-990-3815
Alex Bond	NMA	202-463-2608
Paul Noe	AF&PA	202-463-2700
Lorraine Gershman	ACC	202-249-6411
David van Hoogstraten	BP	202-457-6596
Linda Tsang	AF&PA	202-463-2752
Cindy Langworthy	Hunter + Williams/DARG	202-955-1525

→ Kevin C
(unc)

Date: February 10, 2014

Meeting w/pat Vincent-Collawn, CEO of PNM Resources re: Regional Haze at the San Juan Generating Station and 111(d) (Confirmed) Conference Room 5400

Name	Organization	Phone number
Pat Vincent-Collawn	PNMR	505.241.2802
Ron Darnell	PNMR	505.362.5075
Rachel Miller	Forbes Tate	301.312.8977
Dan Tate	Forbes Tate	202.638.0125
JEANNE PASO	PNM	202.468.9688
Gay Donaldson	EPA - R6	
Kevin Sullivan	EPA	
Janet Nelson	EPA	

Date: January 22, 2014

111(d) Meeting with Tom Lawler

Name	Organization	Phone Number
Tom Lawler	Lawler Strategies	202-310-1960
MIKE CATANZARO	FTI CONSULTING	202-346-8846
Joe Gottman	RFA	
Keri Culligan	"	
Reid Harvey	"	

Date: February 25, 2014

CPI Standards Meeting| Conference Room 5415| 3:00 PM

Name	Organization	Phone number
David Doniger	NRDC	202 289-2403
Derek Murrain	NRDC	202-289-2427
Megan Cronsky	EDF	303-447-7024
Reid Harvey	EPA	202-343-9429
Kath Collica	EPA	
Lara Stine	EPA	

January 21, 2014

Mr. Joseph Goffman
USEPA Headquarters
William Jefferson Clinton Building
Mail Code: 6101A
1200 Pennsylvania Avenue, N. W.
Washington, DC 20460
Goffman.joseph@Epa.gov

Dear Mr. Goffman:

FirstEnergy submits the following comments as a part of the U.S. Environmental Protection Agency's (USEPA) listening session on the standards, regulations or guidelines for carbon emissions from modified, reconstructed, and existing power plants under Section 111(d) of the federal Clean Air Act (the Act).

FirstEnergy is a diversified energy company dedicated to environmental excellence, safety, reliability and operational excellence. Its ten electric distribution companies form one of the nation's largest investor-owned electric systems, serving customers in Ohio, Pennsylvania, New Jersey, West Virginia, Maryland, and New York. Its generation subsidiaries control approximately 18,000 megawatts of capacity from a diversified mix of scrubbed coal, non-emitting nuclear, natural gas, hydro, pumped-storage hydro, and other renewables.

Substantial CO₂ reductions have already been realized over the past decade due to the economic downturn, increasing renewable generation, low natural gas prices, energy efficiency programs, and retirements of older, less-efficient plants resulting from ever-increasing environmental regulations. It is crucial to maintain diversity within our generation fleet going forward in order to hedge against potential price increases and supply disruptions for any particular fuel. From a reliability perspective, it is essential that base-load generation (coal and nuclear) remain a feasible, obtainable, and cost-effective source of generation to meet existing and future energy needs.

While there is a lot of research underway, Carbon Capture and Storage has not been demonstrated, at a commercial scale, for new or existing pulverized coal-fired boilers and cannot be required without jeopardizing reliability. Additionally, even if commercialized, there are legal and risk management hurdles that must be simultaneously addressed prior to implementation.

USEPA is limited to issuing "emission guidelines" addressing factors relevant to the states' implementation of the Best System of Emission Reduction that has been adequately demonstrated at the source to reduce CO₂ emissions and to on-site (inside the fence) steps to

required to take into account the cost of achieving emission reductions and all non-air quality health and environmental impacts and energy requirements. Section 111(d) specifically directs USEPA to establish a procedure for states to submit plans establishing performance standards for existing sources. States possess considerable discretion and flexibility under the Act in developing standards of performance based on USEPA's emission guidelines. To the extent USEPA's guidelines are based on replacing equipment to improve the efficiency of the generating unit, USEPA should clearly exempt such activities from being considered a "modification" for purposes of NSR permitting. These guidelines proposed by USEPA need to be based on an inside-the-plant-fenceline approach allowing the states broad flexibility in developing plans to meet and implement guideline requirements.

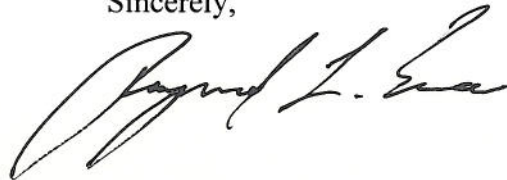
State's should have the option to allow credit for all reductions since 2005, including plant retirements, fleet-wide averaging/trading, improving unit heat rates, equivalency for state programs, averaging/bubbling, trading, unit-specific or generally applicable variances, purchasing energy efficiency credits, adding new lower-emissions fossil fuels and renewable energy, offsets, and other cost-containment mechanisms. States should not be constrained to unit-specific requirements such as heat rate improvements or thermal efficiency improvements.

In the competitive market, current market power prices do not support making these capital investments, such as uneconomic heat rate improvements, that will likely lead to further shutdowns of coal plants. In the regulated market, all costs will be passed on to the customer, which will increase electricity rates.

It should also be noted that use of a mass-based compliance system, as opposed to a rate-based compliance system, would account for all emission reductions captured by various (and therefore account for) reduction options.

We appreciate the opportunity to provide comments as USEPA embarks on its effort to establish guidelines that address carbon pollution from modified, reconstructed, and existing power plants under Section 111(d) of the federal Clean Air Act. If you have any questions regarding these comments, please contact Michele L. Somerday, Manager, Energy Policy at msomerday@firstenergycorp.com or (330) 761-4128 or Michael J. Jirousek, Manager, Environmental Generation Air and Water Programs at mjjirousek@firstenergycorp.com or (330) 384-5744.

Sincerely,



By e-mail and U.S. Mail

Attention: Joseph Goffman, Senior Council for Air and Radiation

I am writing in hopes that you will help the citizens in the White Mountain area, Northern Arizona and anywhere else in the country where massive, multiple control burns are occurring on a daily basis. I am a retired Arizonan and live within approximately fifteen minutes of the Petrified Forest and the Painted Desert. I am also about an hours drive in any direction from four coal fired power plants. . The EPA has taken action for clean air and is attempting to shut down many coal fired power plants in N. Arizona. I appreciate your efforts in this area, but all four power plants do not emit as much carbon and pollution as the Forest Service control and slash pile burns do in a single day. Multiple burns are occurring in multiple counties. It is no exaggeration to say the air is thick with smoke on virtually a daily basis.

If the current Forest Service policies continue many Arizonan's will be sickened and die an early death. I do not understand how you can turn a blind eye to what the Forest Service is doing in terms of control burns. If you truly believe in global warming, then you cannot let the forest service continue with it's current policies. I do not know how the forest service became set on this misguided course of control burns, rather than safer fire management techniques of thinning, responsible logging, animal grazing and air tankers for fire prevention. I am assuming numerous nature groups have lobbied for this approach in an effort to keep the logging and grazing industry from entering the forests. The only way to control forest fires is to prevent crowning or burning from tree top to tree top and control burns are a futile attempt to prevent forest fires.

I am begging you to help our area residents and intervene with the current Forest Service policies. I do not understand why a government agency is given free license to pour massive accelerants on the forest floor and set it alight on a daily basis, while private businesses and individuals are being heavily regulated. There is a huge double standard going on and I would like an answer as to why the EPA is doing nothing to protect the citizens of Arizona? Please don't tell me ADEQ monitors what is going on here. They are nothing but a shill for the Forest Service and do absolutely nothing to help us. Even on days/weeks of heavy cloud cover and inversions, they allow burning. Someone higher up must see what is going on and intervene. I am asking you to do just that.

I have attached an article I wrote for PSR and hope this will shed some light on the plight of Arizonans. We need your help. Thank you for your time.

Marsha Honn, Ph.D.
22 CR 8591
Snowflake, AZ 85937