**MEMORANDUM**

**Date:**  11/20/14

**From:** Ken Mitchell/EPA Region 4

**To:** Clean Power Plan for Existing Power Plants; Docket Id: OAR–2013-0602

**Subject:** Discussion of the Clean Power Plan with South Carolina Department of Health and Environmental Control and the Georgia Environmental Protection Division

**Summary:**

Region 4 provided information on the Clean Power Plan with the South Carolina Department of

Health and Environmental Control and the Georgia Environmental Protection Division on August 12,

2014. The Clean Power Plan for Existing Power Plants was proposed on June 2, 2014.

**Attendees:**

 **EPA**

Janet McCabe/EPA OAR

Beverly Banister/EPA R4

Jeaneanne Gettle/EPA R4

Ken Mitchell/EPA R4

Lora Strine/EPA OAQPS

Reid Harvey/EPA OAP

Matt Clouse/EPA OAP

Other EPA Staff

**External Stakeholders**

Myra Reece/SC DHEC

Catherine Templeton/SC DHEC

Elizabeth Diek/SC DHEC

Mary Walker/GA EPD

Keith Bentley/GA EPD

Jud Turner/GA EPD

**ATTACHMENT**

**Advance Questions for Discussion of the Clean Power Plan with South Caroline Department of**

**Health and Environmental Control and the Georgia Environmental Protection Divison on 8/12/14**

1. Can someone clearly explain how “under construction” nuclear energy is accounted for and why??
2. Why does EPA feel it is important to include “under construction” nuclear in the target calculation? Including it in the target goal takes away any credit that we should get for our leadership in developing our new units.
3. Why doesn’t EPA view nuclear the same as renewable energy for this proposal? Both are zero carbon emission sources.
4. Does EPA agree that the country gets the benefit of the carbon reduction achieved by the “under construction” nuclear and understand that it is the rate payers ONLY in SC & GA that are paying the costs ($24 BILLION) for this reduction?
5. What’s does EPA’s federal implementation plan (FIP) look like? It is imperative that we know this before we approach our legislature on approving our state plan.
6. For SC, the 111(d) standard will be much more stringent that the 111(b). Is that EPA’s intent?
7. Why did EPA choose an interim goal, and not just a final 2030 goal? Impossible for SC to develop a cost effective plan in that time frame.
8. Since this rule is so complex, legally vulnerable and resource intensive to states, will EPA consider expanding the timeframe for state plan submittals?