

ADEQ EPA Clean Power Plan

Proposed Federal Plan Comments

As of 11/3/2015

Topic	Source								Comment
	10/6/15	11/3/15	1/5/16		Email	Letter	Phone	Other	
	x								Existing EGUs that operated sparingly from 2010-2012 baseline years will experience an undue burden when operating profiles change in the future in the mass-based program.
	x								Do state-issued ERCs or allowances during the CEIP period have to be subtracted from a compliance period? How is that done for ERCs?
	x								How will outreach to vulnerable communities affect their health, air quality, and their ability to afford energy?
	x								Gas-shifted ERCs: Does this mechanism encourage EGUs to keep fossil-fuel plants and avoid new renewable resources?
		x							Further clarification for interstate power trading implications, i.e., independent power producers selling power into bordering states and the implications of the pollution produced and credits for that. What discussions have taken place, and what are planned? Is Arizona working toward a trade-ready plan?
		x							Does ADEQ have the resources to study the potential benefit of stabilized or reduced energy costs as the outcome of Arizona's CPP?

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		x							Three people in the stakeholder meeting and one on the phone were very concerned about low income, minority, and indigenous people impacted in AZ by plan. Is it possible that some/all income from credits be allocated to people impacted instead of company's level -- new projects.
		x							We must take any and all action to reduce our CO2 and greenhouse gas emissions ASAP. Where there is a will there is a way, to make these actions a positive effect on transitioning to a renewable energy economy. I urge ADEQ to stand you ground against short-sighted politicians who would derail the AZ CPP.
		x							Federal plan doesn't allow for use of energy efficiency as a compliance option. It should.
		x							What would a facility do if there were no allowances to purchase and they used up their allocation?
		x							In what way will low-income/vulnerable communities be considered in emissions trading? Will revenue from the sale of allowances/ERCs go to projects in low-income communities? If not, how will they be considered?
		x							Owners of EGUs that are due allowances due to operation in the baseline years should not lose those allowances if they retire before or after the start of the compliance period.

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		x							Federal plan needs to minimize shifts from CO2 emissions to other forms of pollution, such as NO2, SO2, and methane.
		x							EPA needs to review the use of "eligible resources" it is used inconsistently and not clearly defined.
		x							Independent power producers who own coal units that risk shutdown as part of the plan must be considered differently as they have no means of recovering stranded costs like utilities.