

# ADEQ EPA Clean Power Plan

## Stakeholder Issues Matrix

As of 9/24/2014

Topic	Source							Comment
	9/3	9/10	9/24	Email	Letter	Phone	Other	
General Goal Setting	x							Does ADEQ believe there are miscalculations or inconsistencies in EPA's calculations?
General Goal Setting	x							Does near-100% usage include all resources such as short term, out of state, etc.?
General Goal Setting	x							Does the annual generating capacity figure assume that all power generation is available?
General Goal Setting	x							Haven't we identified enough significant new issues today that ADEQ should ask EPA for a second chance to comment on the plan after the October 16 deadline?
General Goal Setting	x							How can we influence baseline and goal numbers? When does that period of influence end?
General Goal Setting	x							How does uncertainty of the state's growth rate affect the plan?
General Goal Setting	x							Is hydropower included in the baseline measurements? If so, is a credit given in goal-setting strategies?
General Goal Setting	x							Measurement verification is an important consideration
General Goal Setting	x							What does EPA require to extend the process to 2017?
Infrastructure/Reliability	x							Does the reference to "utility distribution system" include the merchant system?
Infrastructure/Reliability	x							People whose water roles will be impacted by the economic and operational impacts of this rule: Arizona Municipal Water Users Association, League of Cities and Towns, Central Arizona Water Conservation District, Agribusiness and Water Council Office, and Arizona Farm Bureau

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	9/3	9/10	9/24	Email	Letter	Phone	Other	
Infrastructure/Reliability	x							Would it be fair to assume EPA did not analyze transmission constraints?
Legal	x							Federal agencies are required to provide a financial analysis. Will anyone review the financials on this program?
Legal	x							How can the agency move forward with a plan given the Arizona Legislature's current restrictions on ADEQ?
Legal	x							What is meant by legislative authorization? See this as a barrier
Legal	x							Why is ADEQ the state agency lead? Is there a legal requirement to this end?
Legal	x							You are downplaying litigation. Is there a plan to submit a placeholder comment to preserve future legal action and issues?
Other	x							What about Sundt in Tucson?
Other Clean Air Act Programs	x							ACC regulated utilities are forbidden from double counting regarding the REST standard
Other Clean Air Act Programs	x							Concerns with increasing natural gas use and increasing ozone levels?
Other Clean Air Act Programs	x							Since REST isn't tied to greenhouse gas emissions, how do we incorporate these goals?
Other Clean Air Act Programs	x							Will EPA consider what happens when there is a shift of energy generating resources in areas that are currently in compliance, and those not in compliance?
Tribal Sources and Multi-State	x							Are you including coal-fired generation on Navajo land?
Tribal Sources and Multi-State	x							Have you considered a regional approach to the building blocks?
Air Quality and Health Risks		x						Air quality and health risks (asthma, heart disease, etc.)

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Air Quality and Health Risks		x						Asthma data for emergency care: half the cost is paid through public tax dollars, and increases to 62% for youth
Air Quality and Health Risks		x						Concern that coal generation capacity being proposed to shutdown in attainment areas will be replaced with N.G. generation primarily in the Maricopa County non-attainment area thereby exacerbating the local air quality problem
Air Quality and Health Risks		x						Don't fight the rule. Reduce as much as feasible by working together
Air Quality and Health Risks		x						Effects on health/air quality
Air Quality and Health Risks		x						Environmental impacts to Arizona -- should it be forced to completely phase out coal and significantly shift energy portfolio?
Air Quality and Health Risks		x						Federal funding for transportation is affected by air quality compliance
Air Quality and Health Risks		x						Global weather change
Air Quality and Health Risks		x						Large reduction in carbon emissions needed to prevent urban heat increase that will raise ozone levels
Air Quality and Health Risks		x						Look at how air quality impacts low income communities, which is where the higher public costs are (hot spot analysis)
Air Quality and Health Risks		x						Public health impacts of higher CO2 -- drought, wildfires, agriculture, vector-borne disease
Air Quality and Health Risks		x						Respiratory diseases will increase with ozone pollution related to higher ambient temperatures. Need deep reduction in CO2 emissions
Air Quality and Health Risks		x						Responsibility to protect the commons
Air Quality and Health Risks		x						Short/long term cost benefit analysis

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Alternatives		x						Arizona should implement a tax on carbon
BB1		x						Arizona does not receive credit for BB1 because the assumption is redispatch BB2.
BB1		x						Heat rate improvement percentage triggers 111(b)
BB1		x						If BB1 is fully realized on all affected EGUs, what could be the total CO2/Mwh that could be realized and what would the total cost be for the heat rate improvements?
BB1		x						It's high time for coal-burning sources of emissions to adopt Best Technical Practices -- no more delays
BB1		x						Technical infeasibility of Building Block #1
BB2/Redispatch		x						Coal retirement
BB2/Redispatch		x						Concern with peaking capacity with redispatch to NG CCTs
BB2/Redispatch		x						Consider natural gas supply for redispatch; seasonal use
BB2/Redispatch		x						Impracticality of BB2
BB2/Redispatch		x						Market effects for natural gas/gas transport/supply/competition/price. Kinder Morgan says capacity is going quickly
BB2/Redispatch		x						Monthly vs. annual for goal -- consider a seasonal calculation
BB2/Redispatch		x						Single asset generators' ability to redispatch issues: permit limitations; cost/price volatility; lack of supply; transmission; debt purchasing

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BB2/Redispatch		x						System dispatch: EPA fails to reflect the second-to-second load and generation balancing when "redispatching" the system to displace load with NGCC based upon annual capacity factor
BB2/Redispatch		x						Transmission
BB3/Renewable Energy		x						Arizona can do more with BB3 and BB4. This is the low-hanging fruit. Should not be voluntary
BB3/Renewable Energy		x						Arizona has already done a lot, is it still low-hanging fruit?
BB3/Renewable Energy		x						Arizona is doing well. Can the 1.5% reduction continue through 2030?
BB3/Renewable Energy		x						Arizona should create incentives for alternative energy installation especially solar and clean vehicles
BB3/Renewable Energy		x						Biomass credits -- healthy forests
BB3/Renewable Energy		x						Consider other carbon sources, not just power sources
BB3/Renewable Energy		x						Consider other sources of energy: biomass and landfills
BB3/Renewable Energy		x						Does not coordinate with BB4 if distribution/generation are separate. Can distribution energy efficiency measures apply to generation?
BB3/Renewable Energy		x						Energy efficiency for low income
BB3/Renewable Energy		x						Healthy Forests -- use as a creative offset
BB3/Renewable Energy		x						Transportation is a concern with other sources of energys

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BB4/Energy Efficiency		x						Energy conservation strategies should be required statewide
BB4/Energy Efficiency		x						How will building blocks 3 and 4 be addressed in the state plan?
BB4/Energy Efficiency		x						Role of energy efficiency relative to CO2 reductions
Cost		x						Co-op concerns regarding cost and economic development -- Arizona would have a bigger change in portfolio than other states
Cost		x						Co-op concerns regarding harsh climates (summer/winter)
Cost		x						Co-op concerns regarding low income consumers
Cost		x						Co-op concerns regarding nonprofit nature - costs \$32 million to convert to natural gas (narrow margin)
Cost		x						Co-ops need glide path
Cost		x						Cost of inaction
Cost		x						Costs to businesses and consumers
Cost		x						Economic analysis re: how regulations will impact Arizona
Cost		x						Effect on water prices-- transporter is the largest power user
Cost		x						Effects on single-asset utilities
Cost		x						Energy use and production costs/benefits

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Cost		x						EPA appears to have failed to consider the impact of stranded investment resulting from premature replacement of coal generation
Cost		x						EPA cost model: is it accurate and does it reflect transmission issues?
Cost		x						Fails to consider remaining useful life of coal plants
Cost		x						Federal support to help solve the major costs to the industry
Cost		x						Financial hit on utilities?
Cost		x						G & T co-ops -- co-op model (not for profit, member owned) -- building blocks
Cost		x						G & T co-ops -- rural consumers and economies -- rate impact and ripple effect
Cost		x						G & T co-ops remaining useful life of the plant -- interim goal
Cost		x						Generation side as well as transmission
Cost		x						How much will it cost to meet goals?
Cost		x						Impact to electricity rate-payers outside Arizona, due to EPA's proposal for Arizona
Cost		x						Low-income impacts -- cost of possible stranded assets?
Cost		x						Low-income impacts -- opportunities for increased EE/DR, targeted at households with the highest energy burdens?
Cost		x						May need federal rule changes to allow other organizational structures for power development

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Cost		x						Need to look at long term cost impact
Cost		x						Rate impact for rural poor
Cost		x						Remaining life calculations
Cost		x						Remaining useful life of coal-fired units
Cost		x						Significant improvements of facilities
Cost		x						Stranded debt especially for the rural electric cooperatives
Cost		x						Stranded investment -- how to treat?
Cost		x						Stranded investment in newer coal facilities/balance with societal health costs
Cost		x						Stranded investments in electricity infrastructure
Cost		x						Strategies to minimize costs
Cost		x						What are the expected benefits of the CPP, and how will those benefits be allocated across customer classes/income levels?
Enforcement		x						ADEQ needs to be clear
Enforcement		x						Cross-state energy production/uses
Enforcement		x						Enforcement for power users vs. incentives



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Enforcement		x						Enforcement of state EE and renewable standards
Enforcement		x						How does it work in Arizona without central dispatch?
Enforcement		x						How will ADEQ address the issue of governance between the ACC and ADEQ when creating/enforcing requirements of building blocks 3 and 4?
Enforcement		x						How will ADEQ, ACC, and SRP ensure that renewable and energy efficiency provisions are enforceable in Arizona's plan?
Enforcement		x						How will in-state resources and out-of-state resources be quantified?
Enforcement		x						Is there governance authority?
Enforcement		x						Multi-tier
Enforcement		x						Need collaboration, but someone must be responsible
Enforcement		x						Need reliable base load
Enforcement		x						Practicality/legality of operating BB2 at 70%?
Enforcement		x						We have various organizations - some with constitutional powers; a quasi-public utility; and, department reporting to the governor
General Goal Setting		x						A nuclear incentive already exists. It may not need to be included in the plan and could be treated as hydroelectric
General Goal Setting		x						An interim goal prevents a crisis at the end
General Goal Setting		x						Are we including the correct assumptions about future generating technologies?

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General Goal Setting		x						Do the EPA assumptions reflect Arizona's complexity and uniqueness?
General Goal Setting		x						Do the EPA assumptions reflect the natural gas existing capacity?
General Goal Setting		x						Do the EPA assumptions reflect true current climate conditions?
General Goal Setting		x						Each source has different attributes. Trade-offs include reliability/base/infrastructure
General Goal Setting		x						End goal is wrong
General Goal Setting		x						End goal will create massive change and expense
General Goal Setting		x						Energy sustainability and consistency in meeting the goal proposed by EPA
General Goal Setting		x						EPA's calculations determining Arizona's goal
General Goal Setting		x						Existing nuclear power situation -- credit in 2012 and future impact
General Goal Setting		x						Final goal is based upon a lot of inaccurate assumptions for Arizona
General Goal Setting		x						How and who will decide the Arizona end goal?
General Goal Setting		x						How can Arizona's plan be made more flexible to incorporate greater EE/DSM?
General Goal Setting		x						How will pre-2017 reduction be factored into the plan? Will ADEQ request that pre-2017 efforts such as DSM be included into the EPA calculations?

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General Goal Setting		x						Hydro and different nuclear percentage should get more credit. 6% may hurt if Palo Verde Nuclear Generating Station is out for six months. Not sure adding simple cycle exclusions help. Tribal plant inclusion may not help. Storage issues
General Goal Setting		x						If Arizona goals are raised (with others) will result in national goal falling below 30%. Is an increase in goals realistic?
General Goal Setting		x						If Arizona is committed and working together toward a goal, EPA can accommodate our needs
General Goal Setting		x						Interim goal for 2020 isn't necessary. Without the interim goal, there would be more flexibility
General Goal Setting		x						Keep as balanced an energy portfolio as possible. Look at all the environmental impacts of all sources, not just greenhouse gases
General Goal Setting		x						May need flexible compliance strategies instead of a one size fits all approach
General Goal Setting		x						Penalizes states with diversified generation portfolios -- of which Arizona is one of the more diversified
General Goal Setting		x						Possibility that new combined cycle can help meet the interim goal
General Goal Setting		x						Structure the goal along a logical glide path without a large interim goal
General Goal Setting		x						The EPA formula results in one of the most aggressive end goals for Arizona
General Goal Setting		x						The interim goal is necessary, but it should be open to change and offer flexibility, also focus more on energy efficiency
General Goal Setting		x						Want goal to remain and not be lowered. We should discuss how to meet the goal
General Goal Setting		x						Were all states' goals comparable? Compare CO2 per capita

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General Goal Setting		x						What can the public do to support/oppose this rule?
General Goal Setting		x						What is a "glide path"? How would it be implemented if allowed?
General Goal Setting		x						What is the process/plan for correcting EPA's inaccurate assumptions affecting Arizona?
General Goal Setting		x						Will ADEQ request that some of the "excluded" plants be included into the "included" plants in order to reduce the reduction requirements of the Arizona goal?
Infrastructure/Reliability		x						Balanced and diverse energy portfolio
Infrastructure/Reliability		x						Concern transmission connectivity throughout state
Infrastructure/Reliability		x						Reliability
Infrastructure/Reliability		x						System reliability EPA's analysis fails to evaluate the reliability impacts of displacing coal with NG. Electric transmission and gas pipeline
Infrastructure/Reliability		x						Technological feasibility of meeting the EPA target for Arizona
Infrastructure/Reliability		x						Transmission -- coal retirement creates capacity, increase transmission efficiencies
Infrastructure/Reliability		x						Transmission Constraints
Infrastructure/Reliability		x						Unique method/strategies; incentives for solar
Infrastructure/Reliability		x						Water supply -- increased capacity requires more water
Infrastructure/Reliability		x						Water supply -- location of the redispatch may not have water available

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Infrastructure/Reliability		x						Water supply -- recycling water at sites; dry cooling
Legal		x						Enforcement outside the fence
Legal		x						EPA overreach in terms of BBs 3 & 4 (regulation beyond actual CO2 regulation by required or allowing for RE & EE standards and programs)
Legal		x						Need to respect jurisdiction of the federal and state agencies
Legal		x						Outside the fence raises serious EPA authority issues
Legal		x						Regulation should be a state responsibility
Legal		x						What is the status of legal issue comments? Is the Attorney General's office heading up that effort?
Legal		x						Which building blocks are considered to be "outside the fence"?
Other Clean Air Act Programs		x						Any concerns with the increased natural gas use, increasing ozone and the possibility that EPA may change the ozone standards?
Other Clean Air Act Programs		x						Changes to generators are subject to new source permits (NSR). Offsets to emissions will be needed; lack of available offsets; other manufacturers seeking offsets
Other Clean Air Act Programs		x						Explore energy efficiency requirements instead of voluntary participation, e.g. Reno prohibited wood-fired fireplaces
Other Clean Air Act Programs		x						Has EPA captured permit limitations?
Other Clean Air Act Programs		x						Increase in emissions from existing units
Other Clean Air Act Programs		x						Interaction of changes to generation assets and nonattainment NSR (lack of offsets)

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Other Clean Air Act Programs		x						May reduce the need to redispatch or new generation through energy efficiency
Other Clean Air Act Programs		x						Modeling doesn't reflect monitored emissions, not final determination of emissions
Other Clean Air Act Programs		x						The impact the Clean Power Plan will have on current EPA FIPs/ADEQ SIPs for EGUs regarding regional haze and SO2, etc.
Roles		x						IPP potential
Roles		x						What is the role that IPPs (new source) have in helping the state meet the CPP goals?
Roles		x						What is the role that transmission developers have in bringing in renewables to help the state meet the CPP goal?
Tribal Sources and Multi-State		x						Has ADEQ contacted neighboring states to attempt to work on a multi-state plan?
Tribal Sources and Multi-State		x						Implications for existing EGUs located in the Navajo Reservation and Ft. Mohave Reservation
Tribal Sources and Multi-State		x						When will ADEQ decide regarding regional vs. state? NGS?
Air Quality and Health Risks			x					Add medical cost of inaction to matrix: 62% of childhood asthma hospitalization and ER visits are paid by public tax dollars
Alternatives			x					ADEQ should confirm that the "rate" to "mass" conversion is fair to Arizona and appropriate
Alternatives			x					Are the calculations used rate-based or mass-based?
Alternatives			x					Are there opportunities for a BB5?
Alternatives			x					Is there an alternative to the CPP?

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Alternatives			x					Need a range of alternatives -- explore options
Alternatives			x					Should address not just air issues but unintended consequences to water and land, and the drastic shift of potential impacts on the environment
Alternatives			x					The rule offers flexibility to consider other options
BB2/Redispatch			x					Adding more natural gas to the system is a risk regarding cost fluctuations. Arizona should maintain a balance
BB2/Redispatch			x					Fugitive gas from natural gas extraction may result in natural gas having worse climate change impacts than coal. Will Arizona's plan address this? If so, how?
BB2/Redispatch			x					How to require merchant plants to redispatch in general when they already have capacity or contractual commitments?
BB2/Redispatch			x					What is the mechanism for Arizona to weigh the risks of too much dependence on natural gas as a result of rule pushing toward natural gas?
BB3/Renewable Energy			x					Are bio fuels/algae considered renewable?
BB3/Renewable Energy			x					Arizona's actual renewable energy potential is nearly 10 times (NREL) what EPA indicated
BB3/Renewable Energy			x					EPA needs to better define renewable energy. Wind and solar only?
BB3/Renewable Energy			x					How will EPA deal with renewable energy goals which are not backed up by legislation? Ala SRP
BB3/Renewable Energy			x					If there is a SIP violation, would the utilities or others who didn't meet the goal or adhere to the plan be liable?
BB3/Renewable Energy			x					Will state get credit for exceeding renewable energy development goals?
BB4/Energy Efficiency			x					Arizona can incorporate much more energy efficiency than BB4 calls for. Will you consider Arizona's potential for energy efficiency in setting Arizona's goal, specifically in BB4?

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BB4/Energy Efficiency			x					Arizona's energy efficiency potential is about three times that indicated by EPA (according to SWEEP 2012 Report)
BB4/Energy Efficiency			x					Department should comment on getting more credit for being a leader in this area
BB4/Energy Efficiency			x					Does Arizona get credit for current EE measures?
BB4/Energy Efficiency			x					Given the opportunity for Arizona to begin counting energy savings as early as June 2014, what efforts are being made now to document and verify non-utility energy efficiency?
BB4/Energy Efficiency			x					Non-utility energy efficiency in BB4 can provide energy savings and emissions reductions to help Arizona exceed the 1.5% savings goal in BB4
BB4/Energy Efficiency			x					Planning utility and non-utility energy efficiency efforts across multiple years for the future, so that they are and can be counted on
BB4/Energy Efficiency			x					Should get more credit for prior to 2014 implementation
BB4/Energy Efficiency			x					What about credit above 1.5%? Does EPA allow early credit? Can non-utility EE count, and would it be enforceable?
BB4/Energy Efficiency			x					Will measurement and verification for BB4 differ from what's currently employed by the ACC in the EERS? If so, what standard will be used and who will bear the cost of measurement and verification?
Cost			x					Cost of inaction (BAU)
Cost			x					Costs are a function of arbitrary dates for interim and final goals, and disconnect from remaining useful life of large generating assets
General Goal Setting			x					Allow a fleetwide emission goal for units under common ownership
General Goal Setting			x					Arizona population growth is not uncertain. We know we will grow and keep growing



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General Goal Setting			x					Do some scenarios now and in the future impact our comments?
General Goal Setting			x					EPA needs to allow state to make changes since it could not know details of efficiencies or merchant contracts when it set goals
General Goal Setting			x					EPA's proposal for Arizona -- interim and final goals -- depends entirely on "outside the fenceline" approach
General Goal Setting			x					Has ADEQ evaluated an alternative interim goal (vs. no interim goal)?
General Goal Setting			x					Has ADEQ provided comments regarding anticipated growth, energy use, etc. that would impact the goal in general?
General Goal Setting			x					Have you looked at the impact of an "early credit" for any of the building blocks, for example for BB4 (energy efficiency)?
General Goal Setting			x					Have you looked at the impacts and reduced cost implications of doing more than 1.5% savings for the energy efficiency building block (block 4)?
General Goal Setting			x					How best to explore/consider alternative mixes of the four building blocks to achieve at, or close to, the EPA's goals for Arizona at lower cost and with enhanced flexibility? Has ADEQ looked at some of these scenarios, possibly including a different approach to the interim goal?
General Goal Setting			x					How do cleaner fleets impact the goal?
General Goal Setting			x					How would advances in greenhouse gas control technologies be addressed in the rule?
General Goal Setting			x					If we use new control measures' credits, can we use those as credit?
General Goal Setting			x					Impacts of growth
General Goal Setting			x					Is it realistic to be able to change the proposed rule?

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General Goal Setting			x					Is the extension a given? Concerned about losing a year of compliance
General Goal Setting			x					Large differences amongst Arizona utilities with regards to energy generation diversity. For example, TEP has no nuclear and far less gas generation, relying heavily on coal for its customers
General Goal Setting			x					Offsets: Can we use offsets? Should offsets be authorized? Could we buy credits nationally or internationally to help reach the interim goal and retire them? Can we demonstrate any offsets would not be duplicative? What about credits for other sources?
General Goal Setting			x					Priority of comments – what is wrong/omitted in EPA assumptions?
General Goal Setting			x					Retrofits and other means to comply should not make units subject to other rules (NSPS or PSD definitions of a modification)
General Goal Setting			x					Rule should address end of pipe
General Goal Setting			x					Think from perspective of ADEQ and environmental protection. Be creative, do more talking about the future vs. short term impacts
Infrastructure/Reliability			x					Our border with Mexico and the new natural gas pipeline to Mexico -- generation -- new NGCC built in Mexico and imported
Legal			x					Can Arizona push technology through legal and financial incentives on industry, people, government, other systems?
Legal			x					Do you plan to preserve the department's legal position?
Legal			x					Legal/regulatory authority of ADEQ to implement building blocks
Legal			x					May want to hear statements from elected officials
Legal			x					On what issues do we have agreement?

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Roles			x					ADEQ comments – how to balance comments with the political nature of the topic?
Roles			x					Are there areas where stakeholders agree?
Roles			x					Does EPA's analysis consider and what is the impact on a) natural gas prices driven by more demand, and b) availability of interstate gas pipeline capacity?
Roles			x					How is the state or Arizona (ADEQ, ACC, IOUs) moving forward? What is the process?
Roles			x					How will ADEQ move forward in this process now? IPP – ITP – roles
Roles			x					How will agency deal with political aspect and determine its own voice?
Roles			x					How will EPA's rule be applied to disparate coal plant owners? i.e. IPPs vs. utilities
Roles			x					What role is the Technical Advisory Committee playing? What is the makeup of the group? Is anyone missing?
Roles			x					When do we need to have rules in place?
Roles			x					Who makes the decisions balancing issues such as power cost, public health, and grid reliability?
Tribal Sources and Multi-State			x					Is Arizona an attractive partner?
Tribal Sources and Multi-State			x					Should a multi-national approach be considered? What if Mexico generated natural gas for Arizona?
Tribal Sources and Multi-State			x					The ability for the state of Arizona to work WITH tribal communities via a regional plan/multi-state plan to address CO2 reduction for the ENTIRE state of Arizona