



Douglas A. Ducey
Governor

ARIZONA DEPARTMENT OF ENVIRONMENTAL QUALITY



Misael Cabrera
Director

regulations.gov receipt:
1jz-8mza-5tmt

December 24, 2015

Janet McCabe
Acting Assistant Administrator
Office of Air and Radiation
United States Environmental Protection Agency
EPA Docket Center (EPA/DC)
Mail Code 2822IT
Attn: Docket ID No. EPA-HQ-OAR-2015-0199
1200 Pennsylvania Ave. NW
Washington, DC 20460

Re: Request for Extension of Time on Notice of Proposed Rulemaking (NPRM) for Federal Plan Requirements for Greenhouse Gas Emissions From Electric Utility Generating Units Constructed on or Before January 8, 2014; Model Trading Rules; Amendments to Framework Regulations; 80 Fed. Reg. 64966; Docket ID No. EPA-HQ-OAR-2015-0199

Dear Ms. McCabe:

The Arizona Department of Environmental Quality (ADEQ) respectfully requests a 60-day extension of the time to comment on the above-referenced NPRM. ADEQ does not believe that the 90-day comment period provided by the NPRM, which expires on January 21, 2016, is adequate to allow Arizona and other stakeholders to develop meaningful and comprehensive comments on this important rulemaking. A 90-day comment period provides very little time to consider and comment on the over 300 specific requests contained in the NPRM, as well as the related guidance and supporting documents.

In addition, both the Western States Clean Power Plan Initiative organized by the Center for the New Energy Economy and the Arizona Utilities Group are working on technical analyses of the compliance options provided by the final Clean Power Plan rule. ADEQ anticipates that these analyses will provide data and insights that could inform the comments of western states, utilities and other stakeholders on the proposed federal plan and model rules. Results of the analyses will not be available in time for preparation of comments by the current January 21, 2016 deadline. A March 21, 2016 deadline, however, would allow at least preliminary results to be considered.

Thank you for considering this request. Please contact me at (602) 771-2288 or ecm@azdeq.gov, if you have any questions.

Sincerely,

A handwritten signature in black ink, appearing to read 'Eric C. Massey', written over a horizontal line.

Eric C. Massey
Director, Air Quality Division

cc: Regulations.gov